

By email only: planning.policy@medway.gov.uk

Planning Policy
Medway District Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

For the attention of Ms Catherine Smith

Our Ref: 27257/A3/HE
25 November 2022

Dear Ms Smith

HOO DEVELOPMENT FRAMEWORK (SEPTEMBER 2022)
RESPONSE ON BEHALF OF THE "HOO CONSORTIUM"

I am writing on behalf of our client, the "Hoo Consortium", in response to Medway Council's consultation document "Hoo Development Framework" (23 Sept – 25 Nov 2022), which relates to the proposed large-scale housing and employment growth on the Hoo Peninsula and the related Housing Infrastructure Fund (HIF) proposals.

As you will be aware, the Consortium comprises a collection of promoters (inc as landowners and developers):

- Church Commissioners for England
- Dean Lewis Estates
- Gladman
- Redrow
- Taylor Wimpey

The Consortium is promoting major mixed-use proposals to help deliver circa. 10,000 new residential dwellings, new employment opportunities and other associated services/facilities (inc community, education, retail and leisure) and other accompanying land uses on the Hoo Peninsula.

The individual Consortium members may also be submitting their own individual representations to the present HDF consultation, which will focus on the more detailed level of information pursuant to their respective landholdings or proposed "neighbourhoods".

i) Hoo Consortium General Observations

This Consortium representation therefore only comments on the over-arching aims and objectives, plus any relevant wider policy or technical considerations.

Having been closely involved with the emerging Local Plan and Hoo "growth plans" over the past 5+ years, the Consortium:

- welcomes the publication of the present draft Hoo Development Framework;
- is pleased to have had the opportunity of participating in a series of workshops along with other key stakeholders prior to the publication of the present consultation draft;
- fully supports the “vision” and “guiding principles” set out in the HDF;
- remains committed to working with the Council (both “HIF Team” and “planners”) to help deliver a truly vibrant and sustainable new Hoo Rural Town;
- welcomes the progress of the various HIF elements being prepared (Road, Rail & SEMS);
- is keen to ensure the present HDF is not overly prescriptive at this stage, and retains sufficient flexibility to respond to subsequent more detailed information that will be generated at the various detailed planning application stages (inc HIF applications);
- keen to work with the Council to prepare a realistic and deliverable trajectory of both housing, employment and social infrastructure; and to this end
- would welcome the opportunity of continued discussions with Medway Council (and its advisors) regarding the detail and deliverability of the individual elements of this important strategic and local infrastructure.

ii) **Role & Function of HDF in Decision-making**

Greater clarity is required as to the role and function of the HDF in the decision-making process, especially in the absence of a corresponding Reg 19 Local Plan. Such uncertainties are compounded in the absence of any corresponding “Infrastructure Delivery Plan” (IDP) and “Viability Report”.

The “Introduction” to the HDF advises that:

The council's HIF team has been consulting on the transport and environmental projects that form the Future Hoo infrastructure programme. Some of the comments received asked for more information about potential development proposals for housing and employment. People also asked about wider infrastructure, such as schools, health facilities and parks, that would be needed with increased housing on the peninsula.

The HIF programme has a specific focus on strategic transport and environmental projects. These investments address key constraints and are building blocks to enable future growth to be delivered sustainably on the Hoo Peninsula. The HIF funding is only available for these specific transport and environmental projects. Investment in other services, such as schools, surgeries, community and leisure centres would be needed alongside housing growth. Much of the funding for such services would be provided through contributions from developers.

At present, the HDF is silent upon any other potential transport requirements, plus funding for any other services that may be sought from developers. This unfortunately lacks clarity, is ambiguous and results in uncertainty for developers.

At this stage, we understand it is not the LPA’s intention for the HDF to be formalised into “supplementary planning guidance” (SPD) – albeit this could/should be clarified. This is particularly important, especially in the light of the Government’s PPG further advice in respect of plan-making, insofar as:

Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.

[PPG, Para 008: Ref ID: 61-008-20190315] [Our emphasis]

Given the above guidance in relation to SPDs, and our understanding that the HDF will sit “below” an SPD in any plan-making policy hierarchy (and the corresponding lesser degree of weight to therefore be afforded to it), the requirement of the HDF to “*not add unnecessarily to the financial burdens on development*” is all the more elevated.

However, the HDF “introduction” does go on to indicate that:

Whilst this work continues to develop, this document sets out high level design objectives, infrastructure requirements and masterplanning for what a new settlement on the Hoo Peninsula could look like. This work will be used as evidence base to develop the policy requirements for allocations on the Hoo Peninsula for the new settlement, however it is important to note that this document does not itself constitute planning policy.

The above indication is helpful in the context of the “plan-making” process, albeit we are conscious that the next Local Plan will be several years in its preparation, examination, and eventual Adoption. However, it does not provide any context for any “decision-making” in the intervening period and potential imminent Applications.

The eventual HDF should be amended to provide for greater clarification as to the intended role/purpose (and therefore degree of weight) in the decision-making and subsequent plan-making process.

The Consortium remains committed to its continued engagement with Medway Council and is keen to continue the proactive discussions relating to all elements of infrastructure and the strategic environmental management measures being sought/proposed.

Please do not hesitate to contact me should you require any additional information or have any queries.

Yours sincerely


HUW EDWARDS
Planning Director

cc: Hoo Consortium Members