

Town and Parish Council Planning Service

23rd August 2024

Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Dear Planning Policy Team

Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Medway Local Plan

We have been asked to make representations on behalf of Hoo St Werburgh and Chattenden Parish Council (HSW&C) with regard to the Medway Local Plan Regulation 18 consultation.

Whilst recognising that some of the sites proposed in the previous consultation have been omitted, The Parish Council objects very strongly to the grossly disproportionate housing growth proposed for the Parish and the associated social, economic and environmental harm.

With the exception of Kingsnorth, which is a strategically important employment site, HSW&C Parish comprises small settlements in a predominantly rural setting. The proposal to accommodate a significant proportion of Medway's housing growth in one parish, with clear infrastructure deficiencies, predominantly on high grade agricultural land, defies any kind of

planning logic and is very clearly unsustainable and contrary to multiple aspects of national policy.

Collaborative working

It is important for different statutory plan making bodies to work closely together. In the preparation of the HSW&C Neighbourhood Plan, the Parish Council has been open and shared materials informally with Medway Council, rather than relying only on formal consultation stages.

This contrasts with Medway Council's approach. Medway Council has treated the Parish Council as a consultee, rather than a statutory plan making body. Unfortunately, this has contributed to the current situation, where Medway Council continues to promote disproportionate, unsustainable and unrealistic housing growth within the Parish.

Spatial growth options

The three spatial growth options are very misleading, with the descriptions in the consultation leaflet being at odds with the diagrams. Option 1 is described as an urban focus, but proposes housing growth on rural land in HSW&C parish. Option 2 proposes less housing growth for HSW&C Parish, but ignores Kingsnorth. Option 3, like Option 1, focuses housing growth on rural land in HSW&C Parish.

None of these are sustainable options for the parish and none reflect national planning policy. All three options would cause severe economic harm to the Parish and Options 1 and 3 would also create severe environmental damage.

Option 3 appears to allocate housing sites to accommodate over 40% of Medway's overall requirement in the rural part of HSW&C Parish. This is not made clear in the consultation document, and we consider it to be misleading as a consequence. At best this is very poor practice, at worst it makes the consultation unlawful against the context of consultation case law. We have expressed concern over the lawfulness of previous consultations and are disappointed that these concerns have not been addressed.

Option 3 is clearly an extreme and very harmful option, contrary to NPPF policies on growth, site selection, natural environment, food production, infrastructure and other matters. The Parish Council strongly objects to this option.

The following comments explain this objection in more detail.

Roads and transport infrastructure

The main route into and through the parish is the A228. This is used by domestic and commercial traffic and has been recognised by Medway's Planning Department as being over capacity. More development has taken place, and the road suffers from considerable congestion at peak times. Despite this, additional planning permissions are still being granted.

The proposed new Thames crossing will add an estimated 40% to traffic flows and it is unclear how this would or could be accommodated.

There are very limited sustainable transport options in the Parish. This appears to have been ignored.

Housing site allocations on the scale proposed are obviously unrealistic. Indeed, even modest housing growth would result in gridlock. This would affect not just domestic traffic, but also commercial traffic, with serious economic consequences (see later comments).

There are already serious problems with air quality and the proposed housing site allocations, far from addressing this problem, would make it worse and over a wider area.

Utilities

Medway already has capacity problems for both power and water and it is clear that the capital investment programmes of the utility providers have not been sufficient to keep up with the rate of development. This is manifested in power outages and sewage overflows.

The existing capacity problems would be made much worse if housing site allocations were made on the excessive scale proposed. The problem is already beyond the point where heads can remain buried in the sand.

Economy

The impact of Option 3 on the rural economy would be devastating. The housing site allocations proposed would lead to the destruction of large areas of high-grade agricultural land, reducing the area's food growing capacity. This has serious negative implications for the rural economy, rural employment and food security.

The economic harm is not limited to the rural economy. By adding to traffic congestion and creating gridlock, Kingsnorth would become much less attractive to investors and may become non-viable for some existing businesses. This harm to a strategically important employment site would damage the economy of the Parish and the wider Medway economy.

The Sites

Based on the negative impacts described previously, the Parish Council would object strongly to the allocation of the following sites: HHH3, HHH6, HHH8, HHH11, HHH12, HHH22, HHH33. Development on this scale is very clearly unrealistic.

The Parish Council could support in principle proportionate growth in the area through allocation of smaller sites, but only if the transport and highway capacity issues and utility capacity issues were first solved. No sites should be allocated until capacity issues are addressed satisfactorily.

The allocation of these sites contradicts almost all aspects of the third paragraph of the Vision on Page 19 of the Regulation 18 Local Plan. The site allocation harms intrinsic cultural and natural heritage and landscapes. They represent unsustainable growth and fail to consider climate change, transport, natural assets, biodiversity, air quality, public health, wildlife or heritage assets. The countryside is clearly not valued and not protected and enhanced.

Sustainability Appraisal

The huge negative impact of the proposed site allocations is made clear by the Sustainability Appraisal. The Hoo peninsula is one of the most damaging options in terms of impacts on climate change mitigation, biodiversity and geodiversity, landscape and townscape, pollution and waste, natural resources, health and wellbeing, cultural heritage, transport and accessibility.

The Sustainability Appraisal scores Hoo positively in terms of impacts on economy and employment, but this has failed to take account of the lack of transport capacity and negative impact of the proposed housing site allocations on the viability of Kingsnorth.

Policy S22

This is the key policy relating to the development in the Hoo Peninsula. The policy is undeliverable due to infrastructure deficiencies. It is also contrary to national policy, for the numerous reasons given previously. The wording of the policy does not reflect the scale of growth proposed.

Of most concern is Question 28, under the policy. Whilst the policy relates to disproportionate, unrealistic and undeliverable growth, the question relates to the provision of a supermarket. Many people would support a local supermarket, but very few would support Policy S22. We do think inclusion of this question under Policy 22 is misleading and cynical. On this basis, and on the basis of the misleading options previously mentioned, we would suggest that the consultation be withdrawn.

Conclusions

The Parish Council would object strongly to the proposed Local Plan, primarily on the basis of the unbalanced growth proposals for HSW&C Parish, for the reasons:

- Disproportionate growth is proposed for one Parish, causing very substantial harm in terms of climate change mitigation, biodiversity and geodiversity, landscape and townscape, pollution and waste, natural resources, health and wellbeing, cultural heritage, transport and accessibility (as confirmed in the Sustainability Appraisal).
- There would be substantial loss of high-grade agricultural land, causing substantial harm to the rural economy and food production capacity, in addition to substantial harm to the rural and natural environment, sensitive landscapes, habitats and biodiversity, all contrary to national policy.
- Transport infrastructure is already over-capacity, and the proposed site allocation would result in further congestion, gridlock and associated deterioration of air quality.
- Due to transport capacity, the proposed housing site allocations would cause substantial harm to the viability of Kingsnorth, a strategically important employment site, harming the economy of the Parish and the wider Medway economy.
- Water and energy infrastructure are already unable of insufficient capacity, so a substantial increase in housing proposed is unrealistic and undeliverable.

The proposed site allocations for the Parish represent an unbalanced, unrealistic and undeliverable growth strategy for housing, contrary to national policy. The proposed Local Plan fails to meet the requirements in Paragraph 16 of the National Planning Policy Framework December 2023 (and the draft NPPF that is currently subject to consultation).

Yours sincerely



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