

Town and Parish Council Planning Service

27th October 2023

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 Regulation 18 Consultation

We have been asked to make representations on the Medway Local Plan Regulation 18 consultation, on behalf of Hoo St Werburgh and Chattenden Parish Council. The Parish Council objects strongly to the spatial strategy and rural growth proposals contained in the Regulation 18 consultation document.

General Comments

The consultation documents are vague and lack detail and justification. It is unclear how such an unsustainable spatial strategy has been developed. Regulation 18 consultations for other Local Plans in other areas usually include far more information and clarity.

Vision

There is a clear incompatibility between the vision and the later spatial strategy. The vision mentions climate change, protecting heritage and landscapes, strengthening distinct character, valuing the countryside and coast as environmental assets, identifying the estuaries as valued landscapes and habitats. It also recognises that Medway benefits from distinctive towns and villages and that farmland contributes to management of natural resources.

There appears to be a perverse disconnect between these different aspects of the vision and the spatial strategy, which places so much emphasis on obliterating the rural environment within Hoo St Werburgh and Chattenden. The spatial strategy clearly takes no account of climate change, destruction of heritage and landscapes, harm to distinct character, urbanisation of the countryside, harm to the coastal area, erasure of the distinctive identity of villages and loss of grade 1 agricultural land.

Strategic Objectives

There is a similar disconnect between the stated strategic objectives and the rural growth proposals for Hoo St Werburgh and Chattenden. With regard to each of the strategic objectives, we would make the following comments:

Prepared for a sustainable and green future: The growth strategy would fail to manage natural resources (soil) through loss of grade I agricultural land. It would fail to protect natural assets. There is no response to climate change, including rising sea levels.

Supporting people to lead healthy lives and strengthening our communities: The growth strategy would obliterate Hoo and Chattenden village centres within what is effectively a massive urban extension into the rural area.

Securing jobs and developing skills for a competitive economy: The proposed expansion of employment sites could create local economic opportunity, but with high environmental impact and possible harm to the agricultural and rural economy.

Boost pride in Medway through quality and resilient development: The growth strategy clearly fails to respect the historic and natural environment. It directs growth to the rural area, involving massive adverse environmental impacts. There is clearly a complete disregard to the character and variation of local places.

The spatial strategy very clearly undermines the Local Plan's own suggested strategic objectives, in particular through the housing growth proposals.

Spatial Strategy

Paragraph 5.6 indicates that the Sustainability Appraisal will assess the ability of sites to deliver sustainable development, considering constraints and mitigations. It is fairly clear that the rural growth proposals for Hoo St Werburgh and Chattenden are not just unsustainable, but would have devastating impact on Medway's rural environment and economy.

The table on page 15 makes clear that the largest proposed housing growth figure is for rural growth. This is unsustainable and contrary to national policy (see later comments on national policy).

The table indicates an overall delivery figure of 38,216 homes. The housing need figure on page 14 indicates that 19,000 additional dwellings are required, to meet an overall growth figure of 29,000 homes. These figures demonstrate that growth could be accommodated by urban regeneration and suburban growth, with the associated opportunities and benefits. Damaging rural growth is not required to meet housing need. Only proportionate rural growth is required.

The Landscape Sensitivity and Capacity Study highlights the high/medium sensitivity of the proposed housing sites. However, this appears to have had little bearing on the spatial strategy. Also, the landscape assessment misses certain heritage designations and also precedes the Environment Act and other changes to planning policy and guidance. The spatial strategy clearly has very negative impacts on biodiversity.

The withdrawal of the HIF bid clearly undermines the spatial strategy. We note a general comment on providing infrastructure by other means, but without anything more concrete. We are surprised that the Regulation 18 Consultation has been undertaken with such lack of clarity or certainty over how infrastructure would be provided. It is unrealistic and undeliverable without such clarity.

The Parish Council considers that the rural growth element of the spatial strategy is unnecessary and environmentally destructive. This has been pointed out previously, but the community continues to be ignored by Medway Council. There is no economic, social or environmental basis or justification for the spatial strategy. It is incomprehensible why such a clearly inappropriate growth strategy continues to be promoted.

Consideration of National Policy

The consultation document and its spatial strategy appear to have ignored Chapter 5 of the National Planning Policy Framework 2023 (NPPF) in terms of the size and location of sites. Paragraphs 78 and 79 have been ignored completely, despite the spatial strategy referring to rural growth.

There is very clearly a disconnect between the spatial strategy and Chapter 11 of the NPPF with regard to Paragraph 120 (in particular b and c).

It is difficult to see how the requirements of Chapters 14 and 15 have been considered in the selection of sites. Heritage (Chapter 16) has been given little consideration. There can be no confidence in the site selection process, which appears to have given little consideration to national policy, environmental impacts or climate change.

A review of the NPPF is due (a consultation was undertaken at the beginning of the year). This is likely to include changes to housing policy. The enactment of the Environment Act and proposed review of the NPPF will change requirements for considering the natural environment.

Legal Compliance Issues with the Consultation

Hoo St Werburgh and Chattenden Parish Council raised concerns over legal compliance in the previous consultations. There was no feedback on this, but there are clearly implications for the current consultation.

It is unclear how the previous consultation on the Hoo Development Framework Masterplan relates to the current consultation and wider Local Plan process, or how responses to the previous consultation have informed the current consultation documentation, raising further legal compliance issues, against planning law and consultation case law.

We note the land availability assessment is not on the consultation download page, but is available elsewhere. The latest document has an October date and appears to have been uploaded after the consultation start date. This raises further questions over the site assessment and selection process.

Conclusion

Hoo St Werburgh and Chattenden Parish Council objects to the proposed spatial strategy put forward in the consultation document. The grounds for this objection are set out previously in this letter.

In conclusion:

- The spatial strategy would have a destructive impact on the environment and community of Hoo St Werburgh and Chattenden Parish.
- The spatial strategy would fundamentally harm and destroy Medway's rural environment, sensitive landscapes and agricultural land.
- The emphasis of the spatial strategy is on rural growth, which is clearly contrary to NPPF policy.

- The spatial strategy is clearly at odds with the vision and strategic objects contained in the same document.
- The site assessment and selection process appears to have given little or no consideration to environmental impacts or to wider national policy.
- The spatial strategy appears to be unrealistic and undeliverable due to uncertainty over infrastructure provision, raising questions over viability.

Overall, the proposed spatial strategy appears to be the most destructive option for achieving housing growth, especially in terms of community and environmental impacts.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Chetwyn', with a stylized flourish at the end.

Dave Chetwyn MA, MRTPI, IHBC, FIoL, FRSA
Managing Director