

**Representations relating to Medway
Council's 'New Routes to Good Growth'
document.**

On behalf of KD Attwood + Partners

Prepared by Hume Planning Consultancy Ltd

Dated April 2021

This representation is made on behalf of KD Attwood + Partners and relates to the Housing Infrastructure Fund backed, Hoo Consultation 'New Routes to Good Growth' document published by Medway Council in January 2021.

Firstly, it is considered the content should not be referenced as a 'consultation document' as it serves only to advise the public on the content of future planning applications specifically for road, rail and environmental mitigation which that is an obligation of the HIF funding bid itself with limited supporting information to examine. The document is littered with aspirational references of what generally represents good planning practices and objectives with little focus on how they will be achieved. A typical example is on Page 56 where the document gives little detail to support the contention that 'Opportunities to avoid environmental impacts are being explored and wherever possible options for embedding mitigation within our designs are being maximised.' It is not possible to meaningfully comment as part of this consultation on this statement without supporting information to demonstrate how this general objective will be achieved. For this reason, my client will reserve their position and comment on the planning application when this overarching conclusion can be properly scrutinised.

Generally, with respect to environmental impacts, the document contains limited information other than a commitment to a Strategic Environmental Management Scheme (SEMS) linking the proposed development areas and referencing the current application (LPA MC/20/3264) which has already been submitted at the Cockham Community Parkland. The difficulty Medway Council has supplying the necessary information at this stage so that it may properly serve as a true 'consultation' document is, we suspect, caused by several more fundamental conflicts that derive from the wider strategic development proposals that are planned to follow including ;

- a) The fact that without major environmental and transport improvements, Hoo represents an unsustainable location for growth.
- b) Without HIF Funding, the location cannot mitigate these major environmental and transport shortcomings which themselves only elevate the wider location to a baseline position where the level of growth proposed of at least 10,600 dwellings could possibly be considered sustainable.
- c) How HIF timing commitments that require spending on key infrastructure to be in place by April 2024, is driving the timetable for applications and decision making and is the reason why little background information has been made available and can meaningfully be examined at this point and a further reason why this document cannot be referenced as a true 'consultation'.
- d) Related to b) and c) above, is the asserted "distancing" of this infrastructure "consultation" from strategic decision making as part of the local plan process. The document is careful to state, 'Decisions about any future growth on the Hoo Peninsula will be taken as part of the local plan process.' Whilst on Page 6 it states 'the decision to award HIF Funding does not pre-determine the outcome of the planning process'.

These comments are difficult to reconcile with spatial decision making that has already guided the local plan review process up to this point. Medway Council has had a long-standing commitment to growth on the Peninsula basing the last version of the local plan review on growth at Lodge Hill, Chattenden before substituting this growth strategy to nearby Hoo. It is evident that the spatial

decision making of Medway Council to date has been underpinned by growth at Hoo, even in the early stages when Government funding to make a location recognised as unsustainable, to a sustainable one through the transport and environmental interventions mentioned was not in place. This point will be evidenced at the Local Plan Examination and we believe there are similarities with the last Local Plan considered at Examination when the Inspector concluded the plan could not proceed with Lodge Hill included as a strategic allocation.

The supporting Planning Statement to application reference MC/20/3264 for the now submitted Cockham Community Parkland (which relates to a 51.7ha area of land), states the parkland is 'proposed within a wider context of SEMS funded by HIF standalone development with no operational or physical reliance on future development within the wider Hoo Peninsula' (para 4.2). Later in this statement at para 7.7, there is no mention of the wider strategic growth that the community parkland will in part attempt to mitigate stating only 'The proposal would accord with Medway Councils published intention to deliver a network of green infrastructure and open spaces or SEMS to improve residents' quality of life and enhance local ecology on the Hoo Peninsula'.

The parkland is to be provided by 2022 at a cost of £4.5m, from the £170 million HIF Fund pot. Statements that HIF funding bidding and early decision making on spatial options would not prejudice the consideration of local plan options, was more difficult to disprove at earlier stages of the local plan process. The delays to the expected local plan programming combined with the commitments to deliver the infrastructure secured by HIF by the Spring of 2024, realistically make it harder for the council to make this claim that the two processes are completely independent. The suggestion that Cockham Community Parkland (which is planned to be provided by the end of this calendar year) is justified simply to improve 'residents' quality of life and enhance local ecology' and that it is not a building block of a wider SEMS strategy that is a baseline to allow Medway Council's preferred growth option for Hoo to become more sustainable and less environmentally impactful is disingenuous.

This point is more complicated because there is little environmental information in the consultation document other than the aspirational commentary referenced earlier in these representations. The stated objective of creating a strategic network of connected and well managed spaces is a statement that is difficult to take a counter view on in principle. However, the reasons the details are limited is because the consultation document makes clear that the detail of the SEMS will be 'informed by the Cumulative Ecological Impact Assessment which will inform the Local Plan and road and rail proposals. This information cannot be released by Medway Council because it would be admitting that Hoo does, and has for some time, underpinned the local plan spatial strategy. Again, this is a central reason that statements suggesting HIF funding and spending timetables and consultation have not prejudiced local plan decision making, is disingenuous.

Focusing now on the general content of the 'New Routes to Good Growth' document. The document simply represents a milestone before planning applications are submitted to meet HIF funding commitments. The focus is on transport and environmental matters and the document correctly highlights how unsustainable Hoo is as a location without the planned significant transport and environmental interventions.

There is insufficient information within the document to assess the technical highway information, which is necessary to make this unsustainable location more sustainable. However, it is evident that the road and rail interventions are significant comprising three main strands ;

- a new road bypass between the A289 and A288;

- The improvements to the capacity of Four Elms Hill junction; and
- The new rail passenger services planned to the existing freight line.

These three main components of the transport strategy simplistically involve a road-based solution i.e building a dedicated new road and then improving a key junction, (Four Elms Hill junction) which has existing capacity and air quality issues. Pedestrian and cycleway improvements are a 'given' of any new development, but the major road-based solution alone is accepted as not sustainable. Therefore, a supporting passenger rail service is proposed with a new rail station at Sharnal Street together with improvements to the existing freight line to Grain including dualling of the track and a 'waiting loop'. It is evident this rail passenger link will serve as a direct link to central London for commuters but will not be a realistic modal choice for shorter distance movements as a "possible" Gravesend interchange only would be the only option for more localised train connectivity.

Behind these three main initiatives to boost the poor existing sustainability credentials of this location in transport terms, there are 6 proposed phases of works. Whilst there are limited details, many roundabouts on the route are to be upgraded and these have significant knock-on implications as explained below . This is important to consider given the significant environmental sensitivity of the location and the fact that these issues all derive because fundamentally the road and rail-based interventions are an attempt to make a relatively inaccessible location (that is channelled toward an already congested roundabout with air quality issues) more sustainable. Some examples of the knock-on interventions include;

- Complicated cycleway and pedestrian routeways because of the number of roundabouts and need for roundabout capacity to be increased for cars.
- Knock on utility diversions, embankment strengthening and lighting etc all of which have environmental implications. The document references the fact that 'there are no improvement works outside the existing highway boundary'. It is unclear whether this means the highway channel or defined highway boundary. For either option, works particularly in Phase 1, bisect the SSSI at its narrowest point of separation and we will rely on Natural England to assess these impacts in the wider context when there is a greater level of information provided.
- Other implications of the creation of the commuter rail line option are alternatives to the number of level crossings including several overbridges, all of which should be assessed as additional environmental costs to be weighed against the diminishing accessibility benefits of getting residents to London by rail. It is questionable on both counts whether the headline of a 'passenger rail connection' for Hoo's sustainable credentials is of value. This should be reflected in the Sustainability Appraisal underpinning the consideration of spatial options at Hoo if it really is the case that local plan decision making has not already been pre-determined. The option of a possible interchange at Gravesend will do little to promote rail travel from Hoo to the local area as was originally expected.

In terms of environmental impacts, this representation has been critical of the level of supporting environmental information on which we have been requested to comment upon. However, what is evident from the document is the level of environmental sensitivity of the Peninsula and this is reflected in the likely complexity and scale of the SEMs of which Cockham Community Woodland (which itself at over 51 hectares in area) will form a small part of.

The National and European designations affecting this area include Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites, Sites of Special Scientific Interest (SSSI), as well as National Nature Reserves (NNR), the Medway Conservation Zones (MCZ) and the RSPB reserves. The

potential individual and cumulative impacts of the road and rail works alone on the integrity and conservation status of these sites, is significant yet represents the minimum level of infrastructure required just to get to the baseline position in decision making terms that this can location can be claimed to represent a sustainable location. This exercise must then be completed again for the later Stage 2 planned growth. It will need to be explained at the later Examination how the environmental impacts of this infrastructure and subsequent growth including 10,600 homes and other new development in such a sensitive location can score more highly over other spatial growth options which have been dismissed at the urban edge of Medway where environmental, transport and landscape shortcomings have been comparatively deliberately overstated during the site selection process.

Medway Council has instead remained committed to the long standing and blinkered obsession to growth at Hoo which has skewed objective spatial decision making. The 'New Routes to Good Growth' document does highlight the level of road and rail and environmental interventions that are necessary for an inaccessible and extremely environmental sensitive location to get closer to a baseline position where it could be then considered as a strategic development growth option alongside other spatial options that are available. Getting to this baseline has required a minimum of £170 million of public sector funding. The reality is that the accessibility benefits of this option are diminishing whilst the environmental implications are not quantified, yet Medway Council has already prepared its Reg 19 Local Plan central to which is Hoo. Whether it is this "consultation" or other consultations associated with applications by Medway Council for community parks or SEMS it is simply not realistic to assert that these actions have been taken completely independently of the local plan process.

Our final comments relate more to the complexity of delivering some of the baseline transport and environmental infrastructure which we have concerns about in terms of planned timeframes. This is especially important given the HIF funding timing limit for infrastructure to be in place within the next 3 years (Spring 2024). Concerns relating to deliverability include;

- Evident land ownership issues and the possibility of CPO powers needing to be used
- Evident unknown environmental impacts (and inability to consider cumulative impacts) and because of this, the lack of evidence of how the environmental effects will be mitigated. Examples include the awaited Cumulative Ecological Impact Assessment and the Natural Character Area Study by Natural England.
- There also seem to be a number of optimistic programmed timeframes for bridging of rail lines and watercourses etc which are also contingent on the local plan being found sound and the overarching environmental sensitivity and inaccessibility of the location in the first place combined with the lack of objective assessment of alternative spatial options will be critically evaluated against the tests of soundness at this point .

Summary

- This is not a 'proper consultation'. It is an update document providing a little more information on road, rail and environmental infrastructure necessary to make an unsustainable location more sustainable before a planning application is submitted. This timetable is necessary to meet the requirements of the HIF funding bid. My client reserves their position to comment on technical and environmental material when this is available alongside the planning application for this infrastructure.

- The document does however highlight the magnitude of the sensitivity of this location in environmental terms and the level of road and rail interventions necessary to make it more accessible. Given the above, it is difficult to accept that other spatial options have been soundly and properly explored as they should have. We consider that believe that Hoo represents a last resort option, not a 'first choice' that has evidently underpinned spatial decision-making choices to date and simply continues the council's long held aspiration to place development on the Peninsula (which failed before at Lodge Hill).
- It is difficult to accept the assertion in the document that the decision to award HIF funding and planned future growth on the Hoo Peninsula have not already been made as part of the local plan process. This claim becomes harder to believe as the April 2024 for HIF funding spend on this infrastructure draws closer forcing infrastructure applications to be accelerated so as to not miss funding deadlines. The Cockham Community Woodland forming a component part (51ha) of a wider currently undefined SEMS strategy is planned to start later this year at a cost of £4.5 million. The suggestion in the Planning Statement supporting this current application (LPA Ref MC/20/3264) for a 51ha community woodland will 'improve residents' quality of life and enhance local ecology on the Hoo Peninsula' and would be delivered were it not part of a baseline SEMS, but this is not reinforcing spatial decision making as part of the local plan process is not considered credible.

I would request these comments are taken into consideration as it is maintained there are more sustainable growth options that deliver greater transport and infrastructure benefits to existing residents and are greatly more accessible located at the existing Medway urban edge and are significantly less environmentally constrained.

We would urge policy decision makers to reconsider this available and more sustainable option before the Regulation 19 Stage document is consulted upon.