

Rebuttal of Planning Proof of Evidence of Peter Canavan
Prepared by Duncan Parr

LAND OFF PUMP LANE, LOWER RAINHAM, KENT

APP/A2280/W/20/3259868

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1 BACKGROUND

- 1.1 My name is Duncan Parr. My qualifications and experience are set out in my Proof of Evidence.
- 1.2 The evidence which I have prepared and provided for this appeal is true; it has been prepared and is given in accordance with the guidance of my professional institution; and I confirm that the opinions expressed are my true and professional opinions.

2 INTRODUCTION

- 2.1 This short Rebuttal Proof of Evidence addresses certain points raised in the Proof of Evidence of Peter Canavan. This rebuttal naturally does not cover every point raised in Mr Canavan's Proof of Evidence and in that other points are not discussed below it should not be taken to necessarily indicate my agreement with Mr Canavan's analysis or findings.
- 2.2 As such, this rebuttal covers three matters:
- Scenarios adopted as part of the Reg 18 Local Plan consultation;
 - Strategic Land Availability Assessment 2019;
 - Housing Delivery & Supply.

3 LOCAL PLAN REG 18 SCENARIOS

- 3.1 Mr Canavan suggests that weight should be given to the 4 housing delivery scenarios presented as part of the Council's Regulation 18 Local Plan draft, on the basis that they illustrate, in his view, that Medway can meet its overall housing need target. This is not accepted. These are very high-level scenarios only, are the subject of significant objection, and fall to be developed through each and all of the stages comprised within the remainder of the Local Plan process, up until adoption. In my view therefore, these scenarios are not particularly informative and cannot attract anything more than modest weight.
- 3.2 Notwithstanding this I briefly address Mr Canavan's related contentions, below. He refers back to the 2018 Regulation 18 consultation and, when using a recent housing need figure of 28,254, outlines that all four scenarios would meet the objectively assessed need, suggesting that the housing need for Medway is capable of being addressed in a number of ways (and there are sufficient sites to do so) without the Appeal Site.
- 3.3 The Appellant's representation to the Reg 18 consultation is appended to this rebuttal (Appendix 1). However, in short, scenarios 1 and 2 follow a similar development strategy focusing on urban regenerations, brownfield sites, opportunity areas and potential allocations that include on the Hoo Peninsula.
- 3.4 Scenario 2 however seeks to bring forward development on the Hoo Peninsula at a faster rate and achieve a greater capacity on some areas, based on the potential introduction of a new passenger rail service and stations.
- 3.5 Scenario 3 seeks to meet the higher housing need by relying on the development of the urban Opportunity Areas and achieving high densities on appropriate sites.
- 3.6 Scenario 4 is the only exception of the four scenarios which involves development at Lodge Hill, in turn involving elements of development on land designated as a SSSI.
- 3.7 In light of these 4 scenarios, and the recent Hoo consultation (2020) and live HIF consultations, it may be that the Council may progress with scenario 2 (or at least some form of this).

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- 3.8 I attach the Appellant’s representation to the consultation last year (Appendix 2) which considered the potential for development on the Hoo Peninsula and the constraints associated with this, including:
- Transport capacity;
 - Pedestrian and cycle provision;
 - Air quality and climate change implications;
 - SSSI and landscape implications;
 - Green infrastructure provision;
 - Sustainability.
- 3.9 In my view, it is far from clear whether and how these and other fundamental constraints to delivery - seemingly acknowledged by the Council - may be adequately met.
- 3.10 To date, there is no detailed evidence to provide any adequate comfort that proposed development of the scale of development approaching 12,000 homes will be deliverable and sustainable.
- 3.11 Related infrastructure delivery is the subject of early consultation. Any significant development on the Hoo Peninsula will necessarily be dependent on very significant infrastructure and upgrading, which is proposed to be funded by HIF in material part.
- 3.12 There is serious doubt on the ability of the Council to rely upon and use the HIF capital awarded, in the timescale outlined.
- 3.13 If any one of the significant infrastructure projects were not to come forward, then the level of development would necessarily also be impacted.
- 3.14 So, whilst high level regulation 18 consultation documents and vision documents seem to express that 12,000 homes could come forward on the Hoo Peninsula, I am yet to see any detailed supporting documents (let alone applications) which inform deliverability.

4 STRATEGIC LAND AVAILABILITY ASSESSMENT

- 4.1 At paragraph 6.140, Mr Canavan outlines *‘the Local Plan will be supported by the key piece of evidence; the Strategic Land Availability Assessment (SLAA). The SLAA demonstrates that there is a good supply of suitable locations for development.’*
- 4.2 However, the SLAA 2019 gives rise to a number of constraints and questions regarding the delivery of sites and timescales envisaged.
- 4.3 First, when reviewed against this 2018 SLAA, Medway now advance the possibility for 29,244 units, as compared with 15,042 for 2018 (a difference of 14,202). A principal component of the SLAA, which had developed through 2019, is stated to be the Council’s successful HIF bid. The 2019 SLAA confirms: *‘Work at earlier stages of the SLAA had identified transport and environmental constraints to development in this location. The Council has used the updated information from the successful HIF bid to reassess these constraints. This has provided for increased potential land supply in this location.’*
- 4.4 A principal reason given for explaining the increase of 14,202 units are the strategic development sites on the Hoo Peninsula, ‘mitigated’ by HIF. This includes:

- **Ref - 50a - Chattenden Barracks**, was previously considered unsuitable in June 2018 however, is now included for **515 units**. Reasons for inclusion ‘Transport and environmental impacts to be mitigated by Housing Infrastructure Fund’
- **Ref - 714 - Land to east of Chattenden Lane**, was previously considered unsuitable in June 2018 however, is now included for **603 units**. Reason for inclusion ‘Transport and environmental impacts to be mitigated by Housing Infrastructure Fund’
- **Ref - 753 - Land west of Hoo**, was previously considered unsuitable in June 2018 however, is now included for **598 units**. Reason for inclusion ‘Transport and environmental impacts to be mitigated by Housing Infrastructure Fund’
- **Ref - 1065a - South of Main Road, Hoo**, was previously considered unsuitable in June 2018 however, is now included for **1752 units**. Reasons for inclusion ‘Transport and environmental impacts to be mitigated by Housing Infrastructure Fund’
- **Ref - 1066 - South Ratcliffe Highway, west Vidgeon Avenue Hoo**, was previously considered unsuitable in June 2018 however, is now included for **301 units**. Reasons for inclusion ‘Transport and environmental impacts to be mitigated by Housing Infrastructure Fund’
- **Ref - 1084 - Land West of Ropers Lane, Hoo** was previously considered unsuitable in June 2018 however, is now included for **2071 units**. Reasons for inclusion ‘Transport and environmental impacts to be mitigated by Housing Infrastructure Fund’
- **Ref - 1113 - Land to east of High Halstow**, was previously considered unsuitable in June 2018 however, is now included for **760 units**. Reasons for inclusion ‘Transport and environmental impacts to be mitigated by Housing Infrastructure Fund’
- **Ref - 1299 - Land east of Ropers Lane**, was previously considered unsuitable in June 2018 however, is now included for **1879 units**. Reasons for inclusion ‘Transport and environmental impacts to be mitigated by Housing Infrastructure Fund’
- **Ref - 1307 - Potential Expansion Area 2**, was previously considered unsuitable in June 2018 however, is now included for **304 units**. Reasons for inclusion ‘Transport and environmental impacts to be mitigated by Housing Infrastructure Fund’ 304 units.

4.5 Much development previously considered undeliverable is now contended by the Council to be available, suitable and deliverable, with a vast majority (sites in bold) outlined as providing units within 5 years (i.e. by December 2024) (SLAA published December 2019).

4.6 In my view the 2019 SLAA has undertaken a highly unrealistic and unfounded view upon now including these sites within the 5 year supply. The Hoo Peninsula is very unlikely to see this extent of delivery and within the timescales suggested.

4.7 With regard to the above list, the SLAA is overstating housing delivery by approximately 7000 units.

4.8 In addition to constraints limiting Hoo Peninsula numbers, there is also uncertainty over the extent to which such housing will likely start contributing to overall delivery. I discuss this below.

5 HOUSING DELIVERY AND SUPPLY

- 5.1 Mr Canavan discusses this at paragraph 6.11 of his evidence. He notes the AMR identifies a housing supply of 3.03 years. He also suggests however that delivery is increasing. I have given consideration to the potential for delivery of additional housing on sites such as those cited in section 8 of the AMR 'residential pipeline sites'. Sites will either be deliverable and are included within the five year supply, or they are not. There is not an equivocal category of 'may be' sites which "hover on the edge" and are afforded some weight.

2020 AMR

- 5.2 In that Medway did experience an increase in housing numbers in 2019/20, this is still considerably (532 units) behind their requirement. The historic poor supply is illustrated within Mr Canavan's evidence at 6.20 and separately, in the Council's recent HDT results (2020). Additionally, it is important to note that the PPG confirms that the standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure.
- 5.3 While the AMR 2020 identifies a five year supply of 3.03. In section 8, it has a list of residential sites it speculates will deliver housing across three categories (1 - 5 years, 5 - 10 years and 15 + years). The AMR speculates that 1,026 units will be delivered within 5 years across 6 large development sites on the Hoo Peninsula. These are all part of larger sites: two are 1500+ unit proposals and four are 500+ unit proposals. As such it must be questionable if any are likely to be delivered over the next five years.
- 5.4 Indeed, Mr Canavan questions the capability of appeal sites to deliver housing in the next five years. This sits inconsistently with Medway's housing trajectory which includes these pipeline sites on the Hoo Peninsula, against which live applications or appeals are not running. From the information available, such applications are a very long way off. This speculation of delivery beyond the confirmed 5 years supply figure presents no serious or credible analysis.
- 5.5 As outlined within the housing report submitted as part of the planning application, the five year housing land supply figure was between 1.78 and 2.51 years. These figures were assessed, applying a 20% buffer and adopted the Sedgefield method of incorporating shortfall across five years. These figures were not questioned or commented upon by the Council during determination of the planning application.

6 CONCLUSION

- 6.1 I confirm that having considered Mr Canavan's evidence in full, the views expressed in my Proof of Evidence remain unchanged.

Appendix 1

REGULATIONS 18 REPRESENTATIONS

REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN 2012-2035 - DEVELOPMENT STRATEGY REGULATION 18 CONSULTATION REPORT

On behalf of AC Goatham & Son

25 June 2018

1. INTRODUCTION

1.1 These representations have been made on behalf of AC Goatham & Son who is the promotor of Pump Farm and Bloors Farm, both accessed from Pump Lane in Lower Rainham. These sites are shown on the accompanying site location plan, and identified in the Strategic Land Availability Assessment ('SLAA') 2017 under reference numbers 1061 and 750, respectively.

1.2 These sites were formerly promoted for housing development through the representations of Begur limited to the previous Development Options Regulation 18 consultation in April 2017. AC Goatham & Son remains firmly committed to the promotion of the sites for housing development through the Local Plan process. These representations are made in this context and demonstrate a clear justification for designating these sites as a sustainable urban extension to meaningfully contribute to the Council's substantial housing requirements within the district.

2. PUMP FARM AND BLOORS FARM

SLAA ASSESSMENT

2.1 Pump and Bloor Farms are identified in the SLAA January 2017, as being unsuitable. This however imports no individual site or wider assessment. Nor is any explanation provided. The SLAA November 2015 was accompanied by Site Assessments for both sites. They were identified as having a development potential to provide 609 and 656 residential units, respectively. An overall conclusion considered both sites unsuitable for development unless identified constraints can be addressed. The constraints that were here identified as unresolvable, are as follows:

Pump Farm (SLAA Ref: 1061)

- Landscape: due to the site being situated outside of the built up area, with an Area of Locally Valued Landscape of the Lower Farmland, which is considered to be sensitive to change and views from across the River are particularly sensitive. Development was therefore identified as being likely to have a detrimental impact upon locally valued landscapes.
- Agricultural land: as the site is situated on the best and most versatile agricultural land.

Bloors Farm (SLAA Ref: 750)

- Agricultural land, as the site is situation on the best and most versatile agricultural land.

2.2 On all other assessment criteria, the sites' constraints were identified as either "unconstrained" or "anticipated that constraints can be resolved". In respect of the above identified constraints further evidence will be provided by AC Goatham & Son through the Local Plan and planning application processes to demonstrate that the sites are deliverable.

AGRICULTURAL LAND

2.3 AC Goatham & Son (one of the major fruit growers in the UK), on behalf of the two relevant landowners, confirm that these sites will become surplus to core requirement as orchards and will become available for redevelopment during the currency of the Local Plan process. This coincides with a discernible trend of considered future reinvestment by AC Goatham & Son in other, comparatively preferential, sites located nearer to its hub farm operations. More generally, operational requirements will continue to be consolidated for the future, and, as an integral part of this, the subject two sites are not - with regard to such preferentially located, agricultural and benefit-yielding sites - comparatively suitable to be retained as orchards, moving forwards.

2.4 This is owed not least to:

- The sites are located in close proximity to existing residential areas: the operation as orchards has attracted residential complaints over the years, which indicates that increased commercial fruit production and distribution from these sites may give rise to concerns at least amidst neighbouring residential areas, where it is anticipated that such concerns would not be expressed in respect of other sites located nearer to hub farm operations;
- Optimised future reinvestment opportunities: A future requirement for investment in replanting at the sites would inevitably prove substantially less efficient than reinvesting elsewhere, and in a way that coincides with the drive for consolidating and optimising the use of better and preferentially located sites that are nearer to the hub farm operations. It has been identified that such sites will provide for conspicuously better economic and agricultural benefits, in overall terms, when compared with the same level of reinvestment in the two sites. As such, what stands as clear economic and agricultural betterment to be derived from these other sites is now being pursued in alternative preference to the sites.

2.5 Thus, the two sites are not deemed suitable. The landowners are therefore releasing these sites during the Local Plan process from their business portfolio of operational orchards. Notwithstanding the sites' agricultural land status, upon careful assessment of their comparative economic and agricultural benefits and disbenefits (that flow in part from the consolidation of operations more locally to hub farm operations), the need for these sites to remain as agricultural land has been confirmed as having diminished significantly as to effectively extinguish what was formerly identified need. For the purposes of confirming land availability, as set out below, the sites are available now.

2.6 These sites will in turn represent a significant development opportunity, as these are sustainable housing development sites that are deliverable, and should be identified in the Local Plan as Rainham's urban extension. The sites' deliverability is demonstrated in the following section.

LANDSCAPE CONSIDERATIONS

2.7 The sites are designated as an Area of Locally Valued Landscape, which is identified as being a constraint which cannot be resolved, in respect of Pump Farm. This is a general statement without a site specific assessment. It is our view that there will be no unacceptable impact on the landscape value, for which we will provide robust evidence through the Local Plan and planning application processes.

2.8 The Council's Medway Landscape Character Assessment (2011) ('MLCA') identifies this area as an urban fringe with urban/industrial influences. Issues identified include: the value of the area as a green corridor linking communities in urban areas to the countryside and a role as an extended buffer to the County Park and Natural 2000/Ramsar protected coastlines; and a threat of expansion to urban edges on south and west sides along with gradual, pervasive erosion of rural character. However, the landscape "condition" and "sensitivity" are identified as "moderate," and development of the sites with a comprehensive and sensitive masterplan approach to incorporate appropriate landscaping will appropriately manage and address sensitive views to be defined.

2.9 It should also be noted that the sites are currently private land with no public access into or through the land. Development of this site will provide appropriate access to the area linking the existing community of Rainham to the County Park. Without regeneration of these sites through ongoing reinvestment, which cannot economically be sustained in light of the consolidation drive outlined above, the existing orchards will deteriorate which will inevitably harm the landscape value of this area.

THE SITES' DELIVERABILITY

2.10 The National Planning Policy Framework ('NPPF') requires that in order to boost significantly the supply of housing, local planning authorities ('LPAs') should identify and update a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of housing in order to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. "Deliverable" housing

sites are defined as those available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years, in particular that the site is viable. The LPAs are also required to identify specific “developable sites” or broad locations for growth for years 6-10. “Developable” sites are identified as those in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged, as demonstrated below.

Availability

2.11 As explained above, the landowners’ operational requirements for the sites as commercial orchards have been identified as having effectively extinguished. There is also no prospect of the sites being re-used for this purpose. AC Goatham & Son confirm, as freeholder, that the sites are available for redevelopment now subject to the granting of necessary planning permission. The sites are, therefore, available for development now, and have the potential to deliver around 1,250 units in total, as identified in the SLAA 2015.

Suitability for Residential Development

2.12 The sites adjoin the existing residential areas of Rainham which is served by good public transport services and a wide range of services/facilities. There are no constraints that could not be overcome to facilitate residential development. An intensification of commercial orchard operations on the sites will be comparatively less suitable in residential amenity terms, than their residential development. The sites are suitable for housing development, as a highly sustainable and logical urban extension to the settlement of Rainham.

Achievability

2.13 AC Goatham & Son are actively promoting the sites for housing development. Subject to the grant of necessary planning permission, the sites are realistically capable of delivering housing development in the first phase of the Plan period. Development viability will be assessed taking into account the affordable housing requirements, other obligations and market conditions at the time when development proposals are promoted through the planning application process. At this stage, there is no indication to suggest that there will be any viability issues for housing development.

Summary

2.14 The sites are a highly sustainable urban extension to Rainham, and they are deliverable housing sites as being available, suitable and achievable. It is therefore requested that the sites are designated as an urban extension to Rainham with a potential housing capacity of around 1,250 units.

3. THE DEVELOPMENT STRATEGY AND SCENARIOS

3.1 The consultation document sets out four development scenarios focusing on the distribution of housing land to meet Medway’s housing needs. It is understood that these have taken into account how the Council might accommodate a higher level of housing needs in light of the Government’s proposed approach to the standardised method of calculating the housing needs. In this regard, Scenarios 1, 2 and 4 seek to meet the Objectively Assessed Housing Need (29,463 units) based on the Strategic Housing and Economic Needs Assessment with Scenario 3 seeking to meet the higher need (37,143 units) based on the Government’s Standard Method.

3.2 All four scenarios seek to meet the identified housing needs based on the following sources:

- Pipeline sites (completions and permissions);
- Potential allocation capacity on identified sites (as identified as “Potential Site Allocation” for each Scenarios, with all scenarios including the potential development of the Hoo Peninsula, and the “Opportunity Areas” around Strood, Chatham and Gillingham); and
- Windfall allowance over 17 years.

3.3 Scenarios 1 and 2 follow the same development strategy focusing on urban regenerations, brownfield sites, the Opportunity Areas and potential allocations including the Hoo Peninsula. Scenario 2 seeks to bring forward development at the Hoo Peninsula at a faster rate and achieve a greater capacity on some areas, based on the potential introduction of a new passenger rail service and stations.

3.4 Scenario 3 seeks to meet the higher housing need by relying on the development of the urban Opportunity Areas and achieving high densities on appropriate sites.

3.5 Scenario 4 is the only exception out of the four scenarios which involves development at Lodge Hill, which involves elements of development on land designated as a SSSI.

3.6 None of the options will meet the need identified based on the Government’s Standard Method. In response to **Question DS1 on Policy DS2 (Spatial Development Strategy)** we do not consider that the Development Strategy based on the four scenarios are the most appropriate sustainable approach and are demonstrated to deliver the housing requirements based on the Objectively Assessed Housing Need or the Government’s Standard Methods. Our concerns are expressed below relative to each component/source of the housing land supply identified in the development scenarios.

RELiance ON BROWNFIELD URBAN SITES/OPPORTUNITIY AREAS AROUND TOWN CENTRES

3.7 We note that the consultation document identifies development on urban brownfield sites through regeneration as forming a significant component of the development strategy. In particular, it relies on a number of potential sites and wider “Opportunity Areas” around Strood, Chatham and Gillingham. It is not clear how the potential capacity has been identified. The Council also recognises that not all sites are currently available. Whilst regeneration of brownfield sites and urban areas are the most sustainable form of development to increase housing, it cannot be relied upon as a significant component of the development strategy without the potential sites’ deliverability being robustly demonstrated, particularly the availability and development viability. This is particularly the case of urban brownfield sites, which are often constrained by a number of factors, affecting development viability and the time taken to deliver each sites.

THE HOO PENINSULA GROWTH STRATEGY

3.8 The development of the Hoo Peninsula is identified as a core component of the Development Strategy. The identified potential allocations are made up of a number of strategic landholdings, requiring a Masterplan-led approach to ensure a sustainable rural town and its countryside setting and to bring forward significant public transport upgrades. The consultation document identifies that the scale of growth envisaged to make a significant contribution to housing supply is dependent upon significant upgrades in infrastructure. Furthermore, the greatest care and attention needs to be given to sensitively planned growth to respect the countryside setting and links to the wider estuary with the Hoo Peninsula having a distinctively different character to urban Medway.

3.9 There are a number of environmental designations including the international and national significance of the Hoo Peninsula’s habitats and landscapes. Therefore, there are a number of environmental constraints and sensitivities, which would need to be protected and ensure that the growth of the Peninsula achieves a rural character.

3.10 We fundamentally question whether the Hoo Peninsula is the most sustainable location for growth, bearing in mind that there are a number of environmental constraints and it has a distinct rural character, where there is a highly sustainable urban extension site (namely the Pump and Bloor Farms) which has been discounted from the development strategy/allocation, despite the sites being adjacent to the urban area of Rainham with no significant constraint or internationally or nationally recognised environmental protection.

RURAL AND URBAN EXTENSIONS

3.11 We note that the Development Strategy includes a number of extensions to the rural towns and urban areas. These include potential site allocations around East Hill and the eastern side of Rainham both of which are identified as Areas of Landscape Importance and extensions to small settlements such as High Halstow, Lower Stoke

and Allhallows, which are in remote rural locations to further north of the Hoo Peninsula with some lands identified as the best and versatile agricultural land.

3.12 As demonstrated in Section 2 of this submission. Pump and Bloors Farms are a highly sustainable urban extension site, with the agricultural land deemed unsuitable and unviable as commercial orchards and a moderate local landscape value which could be overcome by a sensitively designed scheme. There is no evident justification or indeed evidence for these other sites which are considered to be far less sustainable as growth options having been selected or are currently designated as Areas of Local Landscape Importance being selected while Pump and Bloor Farms are not considered as a potential allocation to meet the pressing housing requirements.

RELIANCE ON WINDFALL SITES

3.13 The consultation document identifies windfall developments as a source of land supply. The windfall allowance identified in all four scenarios are made up of sources including sites coming forward in opportunity areas for redevelopment, residential units above retail and commercial properties, conversion of commercial premises to residential under Prior Approval, renewal and intensification of older residential estates and small sites under 5 units. It states that all these sources represent significant opportunities and therefore provide a realistic basis from which to consider a land supply of 3,332 dwellings from windfall sources. This allowance is made for over the 17 year period. We consider the delivery of some of the sources identified may never be realised, for example, the Council acknowledges that some sites identified within the opportunity areas are not currently available and renewal and intensification of older residential estates could take a considerable time to be delivered. Given the Borough's very significant under delivery of housing supply, the Local Plan should not rely heavily on windfall sites coming forward to the extent being identified by the Council. The Local Plan should instead identify sustainable strategic sites, such as the Pump and Bloor Farms, to ensure that there is a realistic source of housing supply in the short to mid term to meet the identified housing need, particularly if the Council were to meet the higher housing needs (Scenario 4).

LODGE HILL DEVELOPMENT

3.14 Scenario 4 relies on the delivery of potential development at Lodge Hill for a new settlement on Hoo Peninsula. The consultation document notes that a new development proposal is being considered by the national regeneration agency which is significantly reduced in scale from the previous proposal withdrawn at appeal, with a new strategy for nature conservation on the site. That said, however, the revised strategy to deliver development on Lodge Hill does involve elements of development on land designated as a SSSI which is afforded the highest level of protection from development by the NPPF. The LPAs are directed by the NPPF to avoid development likely to have an adverse effect on a SSSI, with the only exception being that the benefits of the development clearly outweigh the impacts. It is noted that the Council included this potential scenario so that a transparent and objective assessment of the impacts arising from potential impact can be made as part of the consultation process.

3.15 On this point, we reiterate that Pump and Bloors Farms do not have any international or national designations and are demonstrated to be a highly sustainable urban extension site, with a potential capacity of around 1,250. The Development Strategy should focus first on sustainable deliverable sites with no international or national designations such as our site.

SUMMARY

3.16 As demonstrated above, we do not consider that the Development Strategy based on the four scenarios which rely on the identified potential sources of housing supply is robust in order to meet the identified housing need. We consider that a highly sustainable urban extension site such as Pump and Bloor Farms should be allocated for housing development as a deliverable site to contribute to Medway's housing supply.

3.17 We are supportive of the housing delivery policy (H1) which seeks to provide a supply of land to meet the housing needs and meets the principles of sustainable development by allocation of sites and broad locations for development which will be established in the Local Plan to ensure a supply over the plan period. In line with Policy H1, Pump and Bloor Farms should be allocated for housing development.

4. DEVELOPMENT MANAGEMENT POLICIES

4.1 This section makes comments on development management policies:

POLICY H3 - AFFORDABLE HOUSING

4.2 The policy sets 30% and 25% affordable housing requirements, for rural Medway and urban Medway respectively. However, rural and urban areas are not defined for this purpose. In this regard, the North Kent Strategic Housing Market Assessment 2015 (SHMA) identifies specific rural wards to which the higher target of 30% would be applied. In order to provide clarity in the policy itself, we consider that rural and urban wards are identified in the supporting text for the policy.

4.3 The NPPF is clear that viability consideration is a key to facilitate development to be deliverable. The NPPF also recognises that affordable housing policies should be sufficiently flexible to take account of changing market conditions over time. As such, the policy should be amended to include viability considerations to be taken into account in assessing the provision of affordable housing at the planning application stage.

POLICY H9 - SELF-BUILD AND CUSTOM HOUSEBUILDING

4.4 We do not object to the principle of policy promoting self-build or custom home development. However, **Question H17** seeks views on a suggestion to set a threshold of development of 400 units or over to make at least 5% of the plots available to self/custom builders to purchase. This aspiration should be evidence based and should only be sought subject to development viability, taking into account the affordable housing requirement.

4.5 **Question 18** provides a prescriptive period of 12 months of marketing of self/custom plots before they are offered to the Council/Housing Association to purchase. Only after the Council or the housing association do not wish to purchase the plot, then it will be returned to the developer to build/or sold on the open market. We are concerned that this approach will delay the delivery of residential units, and as such, the marketing period should be reduced to 6 months.

4.6 **Question 19** places the onus on the developer to advise the Council when each plot has been sold in order to monitor the development. This is on the back of the Council's intention to ensure that the plot purchased by a self/custom builder is built within 3 years of the date of sale, before being offered to other applicants on the self build register to purchase. We consider that this approach introduces a complexity and could potentially result in housing plots undelivered. As such, we consider that the plot should be returned to the developer to build and/or sold on the open market in order to ensure that residential units are constructed in a timely manner.

POLICY E2 - RURAL ECONOMY

4.7 The policy seeks to direct development to land of lesser agricultural land, where feasible, and promotes the sustainable development. As demonstrated in Section 2 of these representations, regardless of Grades identified for agricultural land, there are integral factors that make existing agricultural land unsuitable to be used as agricultural land in the future. This includes the unsuitability of land assessed with regard to the distinct, comparative economic and agricultural benefits and disbenefits of sites that in turn will require cross-assessment of the two sites with other preferentially located and yielding sites. This assessment has been undertaken with regard to the two sites and all other relevant agricultural sites.

4.8 Consistently with the outcome of this assessment, the two sites should be considered for release to alternative uses such as residential development so that they can contribute to Medway's development needs. This, in turn, will assist in protecting and enhancing the best and most versatile agricultural lands which are suitable for continued agricultural uses.

POLICY NE4 - LANDSCAPE

4.9 We note that the Council will be updating its evidence base to provide a basis for determining the accessibility of development proposals and areas that need to be protected and enhanced. We reserve our right to comment on the policy once further evidence is published.

POLICY BE1 - PROMOTING HIGH QUALITY DEVELOPMENT

4.10 We object to the policy criterion which seeks development proposals to achieve a transition from urban to rural, where appropriate. We consider that this policy is too vague and not clearly justified.

4.11 We request that the criterion which seeks a BREEAM standard of “Very Good” is specifically related to commercial floorspace of over 1,000sq.m, so that this would not be applied to residential or small-scale developments.

POLICY BE3 - HOUSING DESIGN

4.12 We object to the policy criterion requiring “compliance” to meet the Medway Housing Design Standard for external spaces, as the document does not form part of the Development Plan, and should be used as a guide only.

POLICY HC1 - PROMOTING HEALTH AND WELLBEING

4.13 The policy requires a Health Impact Assessment be prepared for major new residential development where Environmental Impact Assessment (‘EIA’) are required, and such an assessment is to be prepared in line with the HUFU Rapid Health Impact Assessment Tool. We do not consider that this requirement is necessary in this policy as Health Impact Assessments are required as part of an EIA under the EIA regulations, which also set out the scope and requirement for Health Impact Assessments. We therefore suggest that this criterion is unnecessary and should be deleted.

POLICY HC2 - COMMUNITY FACILITIES

4.14 The policy requires provision to be made for community facilities within new developments. We do not object to the principle of this aspiration, but such a requirement should be considered based on the scale of the development and any need for such provision, taking into account the existing community facilities.

POLICY I3 - EDUCATION

4.15 This Policy requires that new residential development of significant scale to provide education facilities within their development in order to create sustainable communities. This requirement is too vague in terms of the definition of “significant scale” residential development and “educational facilities”. In any event, educational facilities such as the need for school provisions should be informed by a school placement study, and should not be an automatic policy requirement for all significant scale residential developments.

Appendix 2

HOO PENINSULA REPRESENTATION

“PLANNING FOR GROWTH” - HOO PENINSULA CONSULTATION DRAFT

1 INTRODUCTION

- 1.1 Rapleys LLP is instructed on behalf of AC Goatham & Sons to submit representations to Medway Council, as LPA, in relation to the consultation draft, entitled “*Planning for Growth*” on the Hoo Peninsula (“**Draft Document**”). The intended status of any adopted version of this document is presently unclear. For present purposes it is treated as an intended draft/supplementary planning document or guidance.
- 1.2 These representations follow on from earlier representations prepared by Rapleys LLP in respect of the Regulation 18 consultation (June 2018).
- 1.3 These representations include consideration of the following:
- Present stage of local plan-making process and its onward scheduling
 - Housing Infrastructure Fund
 - LPA’s overarching vision for development of the Hoo Peninsula
 - Constraints to development of the Hoo Peninsula.
 - Transport capacity
 - Pedestrian and cycle provision
 - Air quality and climate change implications
 - SSSI and landscape implications
 - Green infrastructure provision
 - Sustainability
 - Review of housing delivery and supply, encompassing SLAA 2019

2 LOCAL PLAN-MAKING PROCESS

- 2.1 Following regulation 18 consultation in Summer 2018, the LPA is yet to publish a draft Local Plan for regulation 19 consultation. The timescale for doing so has progressively slowed considerably. It is now very unlikely that the LPA will meet even their revised target (Local Development Scheme December 2019) of “*Summer 2020*”. The consultation document now broadly advises publication “*later this year*”. This is very unlikely to prove achievable.
- 2.2 Any adoption of a (sound) local plan even by December 2021, is now almost certainly unachievable.

3 OVERARCHING VISION FOR DEVELOPMENT ON THE HOO PENINSULA

- 3.1 Building on the regulation 18 consultation document (Development Strategy 2018), the Draft Document seems to continue to pursue ‘Scenario 3’ within the context of concentrated housing delivery of the Hoo Peninsula. This is despite the very recent approval by the Council of a sizeable housing scheme (202 units) at Land South of Lower Rainham Road.
- 3.2 The Draft Document is notably very limited in detail. It appears instead to adopt the format of an uninformed, very high-level ‘vision’ document. It does not incorporate any considered assessment but merely outlines the one proposed option: for the provision of up to 12,000 homes on Hoo Peninsula. Disappointingly, no consideration is given to any alternatives for the delivery of housing.
- 3.3 Quite aside from the demerits of concentrating housing development, of such a scale, on Hoo Peninsula, this represents a fundamentally flawed approach since the growth strategy will ultimately prove dependent on very significant infrastructure delivery and upgrading - of which, again, conspicuously no detail has been

provided by the Council. If any one of the significant and interdependent infrastructure projects (whether road or rail, etc.) were not to come forward, then consequently, the level of development provided would inevitably be frustrated - and in significant part.

- 3.4 It is unsatisfactory that a proposal for what amounts to a very significant level of development is so precariously dependent upon doubtful and vaguely expressed infrastructure schemes, the delivery of which remains without evidence and highly questionable.
- 3.5 In addition to infrastructure, various constraining environmental designations (including the protection of Hoo Peninsula's habitats, etc.) require appropriate protection and management. Other protections are afforded to various local landscapes. No detailed consideration is given within the Draft Document to the impact on protected habitats, features and landscapes, of a strategy for delivering c.12,000 homes. It presently appears doubtful that such constraints can sustainably be met.
- 3.6 Consistently, our previous representations fundamentally questioned whether the Hoo Peninsula is, first, the most sustainable location for significant housing development and second, if it is a sustainable location in principle, whether development of such a scale is sustainable and indeed deliverable. The Draft Document regrettably does nothing to alleviate these basic concerns.
- 3.7 We note that whilst the Draft Document incorporates a list of headline opportunities that provide for a (very high level) illustration of the potential of Hoo Peninsula sites, these fail to address the severe constraints associated with the envisaged level of development of the Hoo Peninsula. These do not extend into any meaningful discussion of sustainability or deliverability. The opportunities outlined are just three generic statements which purport (poorly) to address obvious concerns with development on the Hoo Peninsula. This includes: new inward investment in the local economy associated with large scale residential development; improvements to the road network and public transport, yet no assessment of how additional movements will be managed, is given; and, an improvement in the 'general quality of life', which may be true of many locations where up to 12,000 additional homes are proposed to be built. Overall, the insignificant opportunities do not begin to outweigh the major constraints noted within these representations and which are indeed recognised by the Council.
- 3.8 In addition, an alternative concern arises even were such large-scale development even sustainable in principle (which is strongly doubted). Should development fall materially below the level projected in the Draft Document, due (say) to lack of critical mass, then it would follow that many of the improvement opportunities outlined would also fall away. Such improvements are presently suggested to include an aspirational re-opening of the train station at Hoo and revival of some stopping passenger train services, in addition to road network improvements, and bus service and cycle route enhancements.
- 3.9 This concern is substantiated by the Council's approval on 28 April 2020 for 202 units on the unallocated site at Land South of Lower Rainham Road (MC/18/1796). The Council here acknowledges that Scenario 3 and the Hoo Peninsula cannot suitably deliver the quantum of housing it claims.

4 HIF

- 4.1 The Draft Document is heavily reliant on HIF. There is clear acknowledgment that much of any development of the Hoo Peninsula will only prove possible in conjunction with HIF funded infrastructure and derivative investment. HIF was awarded in November 2019. However, the specific triggers for and any phasing etc. remains unknown.
- 4.2 To our knowledge there remains no published information detailing the content of the Council's HIF award. Three published reports to Committee provide scant information of the progression to the award:
- Cabinet Meeting of 5 February 2019;
 - Council Meeting of 10 October 2019; and
 - Cabinet Meeting of 7 April 2020.

- 4.3 Development of the Hoo Peninsula was discussed at a Committee meeting on 10 October 2019. This report was inviting additional funding to allow for work to continue in association with the HIF bid. Whilst the decision was approved, the additional work required to be undertaken to properly formulate the bid (and ultimately to direct any award) and which had been briefly mentioned, is still yet to be published.
- 4.4 The report had stated that the work to be completed by December 2019 (if the expenditure deadline was to be met) included the publication of an Infrastructure Delivery Plan and associated viability assessment for the Hoo Peninsula. Unsatisfactorily, there remains no evidence that this work has been meaningfully progressed, still less completed, internally. No Infrastructure Delivery Plan has been published, to date.
- 4.5 The 7 April 2020 Report to Cabinet failed to detail the progression/timescales of any HIF funded projects, albeit it did suggest that all HIF money must be spent by 31 March 2024. No evidence has been published by the Council projecting any infrastructure works.
- 4.6 In the circumstances, there is serious doubt on the ability of the Council to allocate/expend all (or even the majority part) of the HIF money awarded. This is before any scrutiny is given of the triggers for HIF expenditure. This will, in turn, have obvious implications for the delivery of all infrastructure necessary to support development of the Hoo Peninsula.

5 CONSTRAINTS TO DEVELOPMENT ON THE HOO PENINSULA

Transport Capacity

- 5.1 The Draft Document unsurprisingly confirms that the development of a small rural town on the Hoo Peninsula and extended employment areas will be much dependent on strengthened connections and significant transportation upgrades. Highway improvements to the existing A228 and A289, a new road and new rail passenger services are highlighted as key infrastructure projects.
- 5.2 A break-down of funding was outlined in a report to Committee in October 2019:
- Road investment - £86.7m
 - Rail investment - £64m
 - Other essential infrastructure - £14.3m
- [Professional fees - £5m]
- 5.3 The Council has suggested that this infrastructure will unlock the delivery of 10,000 new homes. The Council's own understanding is that this includes a 'deadweight' figure of 2,000 homes for Hoo Peninsula. 'Deadweight' has been approached by the Council as to mean the number of dwellings said to be capable of delivery when accounting for current infrastructure, without the requirement for HIF money. No evidence has been provided regarding how the deadlock figure has been reached, especially considering existing constraints acknowledged by the Council.

Road Network

- 5.4 Identified, required, road improvements total circa £86.7 million. These include:
- improvements to A289 for:
 - Anthony's Way Roundabout, and
 - Sans Pareil Roundabout;
 - Four Elms Hill;
 - local road improvements Bells Land and Ropers Lane roundabout;
 - new bypass from A228 Main Road roundabout to:

- A289 west of Four Elms, and
 - A228 at Chattenden Road;
 - new signalised junction to replace roundabout at Main Road and Hoo Peninsula;
 - New signalised access road off Ratcliffe Highway for new train station at Sharnal Street.
- 5.5 The Draft Document confirms that HIF money will be necessary to bring about a reduction of traffic queuing on Four Elms Hill, an acknowledged area highlighted in the Draft Document to be a major constraint. No specification is given for these improvements, and so their acceptability cannot properly be assessed.
- 5.6 For the Council to even have the chance of meeting the HIF timescale (i.e. expenditure by 31 March 2024), this road scheme, as with others, would need to reach (developed design) ‘RIBA stage 3’ and include coordinated and updated proposals, realistically, as part of a December 2020 submission. There is no basis for thinking this to be achievable.
- 5.7 More generally, there is a continued absence of any detailed proposals in respect of required road investments, which the Council itself acknowledges.
- 5.8 If the Council has indeed completed design work as part of progressing the above road or other improvements, then this warrants publication, further consultation and review.

Rail

- 5.9 Proposed rail improvements, totalling £64 million, may include:
- Creation of new (direct) service from London Victoria to Hoo Peninsula:
 - Up to one train per hour frequency (said to be deliverable with existing infrastructure);
 - reopened station at Sharnal Street:
 - new modular station and platform;
 - passenger drop-off area;
 - new signalised access off Ratcliffe Highway;
 - new access road to the station;
 - public space;
 - car parking;
 - Link on Medway Cord line to Higham:
 - allowing freight to connect to Paddock Wood, without travel via London;
 - new services from Hoo to Medway via Higham and Strood;
 - Up to two trains per hour frequency.
- 5.10 No information has been forthcoming regarding possible rail improvements within the Draft Document. None is available online.
- 5.11 The accent within the Draft Document on rail infrastructure coming forward rather emphasises the importance of detailed infrastructure delivery plans to fully set out such proposed improvements, as well as the timescales and basis for their sustainable delivery.
- 5.12 In their absence it is obviously impossible to appreciate how these will enable or impact upon the deliverability more generally of housing on the Hoo Peninsula. The complete absence of this information is

the more disappointing given the Council's present direction of travel for the Hoo Peninsula to be a significant focus of the eventual submission local plan.

- 5.13 More particularly, in that the Council outlines its vision that the reopening of a train station may be achievable and an extended service provided, it is highly questionable that there exists the wider integrating infrastructure across the rail network to sustain this. Discussions with Network Rail appear to be at a very early stage. We anticipate that Network Rail will require a robust business case to justify the provision of a new rail service, subject to integration within the network.
- 5.14 Further, without the delivery of a new train station, it is questionable whether the significant level of development for Hoo Peninsula would prove sustainable and deliverable.
- 5.15 Even if sustainable in principle, delivery of rail infrastructure would inevitably take considerable time. Even were the Council now in a position to forecast the delivery of this infrastructure (which, evidently it clearly is not), its reliability would be questionable given the Council's track record.
- 5.16 It is by no means characteristic of a HIF award authority to withhold or fail to work up a properly developed infrastructure proposal. For example, the proposal by Essex County Council for Beaulieu Station and North Eastern Bypass is, openly, to provide a new railway station alongside highways improvements (including a bypass similar to that proposed by Medway Council). By an update published 19 February 2020, ECC had announced the following 'opening' dates:
- North Eastern Bypass - 2024;
 - Beaulieu Station - 2025/16.
- 5.17 A request for a Scoping Opinion (ref. CC/CHL/14/20/SPO on Essex CC's planning database) was also validated 21 February 2020 for: *Chelmsford North East Bypass (CNEB): A single carriageway road between Roundabout 4 of the Beaulieu Park Radial Distributor Road (RDR1) and a new roundabout on the A131 at Chatham Green plus dualling of the existing A131 between Chatham Green and Deres Bridge roundabout.*
- 5.18 We add that albeit Medway Council's HIF bid was c.£50 million less than that of ECC, it has seemingly been made in respect of broadly the same level of infrastructure works.
- 5.19 In clear contrast with ECC, the Council is regrettably yet to publish any detailed information for future HIF expenditure and intended HIF works.
- 5.20 Indeed, were ECC's infrastructure delivery trajectory to be adopted as any comparable guide, it appears highly unlikely that Medway will complete HIF infrastructure works before 2025.

Pedestrian & Cycle Provision

- 5.21 The Draft Document also rightly highlights various significant barriers to development of the Hoo Peninsula. But one notable constraint is the existing pedestrian network which is notably fractured throughout the Peninsula. Other parts of this network are unsafe (e.g. travelling north east along Stoke Road, and access between Peninsula Way and Stoke Road (north - south). Additionally, as also noted by the consultation document, Peninsula Way acts as a barrier for movement with limited safe crossings. Evidently, with proposed development to the north and south of Peninsula way, safe crossings are vital to allow for sustainable travel. However, the document provides limit information on how this will be provided, instead it loosely locates two areas on the peninsula where this might be possible.
- 5.22 The pedestrian network will certainly require very significant improvement, inevitably requiring significant investment - which it is presently uncertain to come forward.
- 5.23 There is additionally the road network, other than intended HIF road improvements. Ropers Lane has seen investment to improve the pedestrian and cycle routes yet many other roads have not (including between the new proposed train station, and proposed or existing settlements at Hoo and High Halstow along Christmas Lane and Ratcliffe Highway). It has not been demonstrated that any funding will be available

through HIF in order to carry out what amount to essential strategic infrastructure works in support of such development of the Hoo Peninsula.

Sustainability

- 5.24 The Hoo Peninsula is notably poorly connected to surrounding large towns such as Gillingham, Chatham and Strood. The Four Elms roundabout which serves as a gateway in and out of the Peninsula already suffers severe congestion. In the absence of any detailed evidence regarding improvement to the Four Elms roundabout, it is unknown whether this gateway can begin to sustain very sizeable development of up to 12,000 homes.
- 5.25 The Hoo Peninsula is also poorly connected by public transport. The bus service providing direct access to Rochester and Chatham is limited and journey times are often delayed due to congestion on Four Elms Hill and across the River Medway. There is also no rail service which provides high speed travel.

Air Quality & Climate Change

- 5.26 The gateway into Hoo Peninsula is the Four Elms Roundabout. There is a traffic bottleneck between the Four Elms roundabout and the roundabout at the junction of Peninsula Way and Main road. This stretch is included within an Air Quality Management Area. It is unknown how the Council intends to successfully develop an action plan for air quality improvement within this area, compatibly with the development of up to 12,000 homes on the Hoo Peninsula.
- 5.27 The only information showing any integrated consideration of air quality and development on Hoo Peninsula is briefly set out in the Council's 2019 air quality monitoring report. This rather unconvincingly suggests that the intended development of the Hoo Peninsula is likely to bring about air quality action planning benefits, including:
- increasing bus use, albeit this is dependent on traffic flow improvements, enabling shorter journey times and increased punctuality in services. Whilst an improved bus network may well be introduced when development come forwards, service take-up is a complete unknown and most likely to be marginal when compared with the considerable level of private car use. Private car use is not addressed;
 - promoting walking and cycling, through new walking and cycling routes via a Strategic Environmental Management Scheme. However, only a small proportion of pedestrians will be located within a reasonable walking distance of the proposed train station, which will likely give rise to only an immaterial reduction in private car use for those travelling through the AQMA; and
 - Hoo peninsula masterplaning.

SSSI & Landscape

- 5.28 Chattenden Woods and Lodge Hill are Sites of Special Scientific Interest (SSSI), including an area of ancient woodland and rare grassland, are of national importance. Any development inappropriately affecting the habitats and features of either of these sites and their ineffective management, will be contrary to national policy and no less important environmental policies of the development plan.
- 5.29 The Draft Document plainly proposes a very significant level of housing development in close proximity to (and directly abutting) the boundary of the Chattenden Woods and Lodge Hill SSSI. It is however unclear what justification the Council may provide for the arising impacts on the SSSI and whether an appropriate level of SSSI management could be achievable alongside development on this scale.

Green Infrastructure

- 5.30 The Draft Document outlines that a comprehensive green infrastructure network consisting of both natural green assets and public open spaces will enable travel to key destinations for pedestrians and cyclists. These areas are however currently shown merely as green buffers on a plan. No evidence has been provided of how much of these networks will be need to enable sustainable movement.
- 5.31 The green corridors and landscape buffers located between Hoo St Werburgh, Port Werburgh and Chattenden appear to be minimal. It is unclear how these will provide the necessary buffers required to adequately protect the characteristic open landscape of Hoo Peninsula.
- 5.32 Overall, it is far from clear how the constraints acknowledged by the Council will be adequately protected and with appropriate mitigation, where required. The very limited scope of the Draft Document fails obviously to detail and provide comfort that proposed development of the scale of anything approaching 12,000 homes can prove sustainable and deliverable. The strong appearance is that such significant focus within Hoo Peninsula will prove unsustainable and undeliverable.
- 5.33 We again urge the Council to develop alternative strategies for housing delivery.

6 HOUSING DELIVERY

- 6.1 The 2019 Housing Delivery Test (HDT) results were published in February 2020. The result in Medway is 46% (4,328 required; 1,978 delivered; 2,350 shortfall).
- 6.2 While the overall number of units delivered has increased since 2018, the overall result has worsened. Had the Council seen the delivery of just 53 fewer units over the previous three years, the result would have fallen to below 45%.
- 6.3 Next year (and for all those following) the presumption will be triggered by any delivery below 75% of housing required. The Council would have to see the delivery of c.2,200 units in the next year. This will almost inevitably prove unachievable.
- 6.4 The housing supply shortfall is expected to exacerbate extensively over subsequent years. Should the Council plan for such a large concentration of housing delivery in Hoo Peninsula, in respect which the delivery rate is expected to be slow, this will only undermine the Council's housing supply over the immediate and medium terms.
- 6.5 Since 2002, the Council's rate of delivery has averaged at 699dpa. Since the expiration of the Kent Structure Plan in 2011, this has reduced to 605dpa. When viewed against the standard method requirement of 1,693, this highlights an annual and increasing shortfall of an average of 1,000 units.
- 6.6 There is strong evidence that the Council has consistently over-estimated its housing supply. It has been unable to deliver more than c.3,400 units per five-year period, since at least 2009.

2019 SLAA

- 6.7 The 2019 SLAA suggests that all sites have been reassessed. However, within the Appendix 3 schedule, very little detail is given of this reassessment. Several sites are also now included which were acknowledged to be unsuitable by the preceding SLAA (June 2018).
- 6.8 The SLAA now includes 22 new sites located within the Hoo Peninsula, in respect of which it is suggested that HIF money will provide for appropriate mitigation. The SLAA inadequately suggests for all of these that "*Transport and environmental impacts to be mitigated by Housing Infrastructure Fund*". Of these sites, it is suggested that a total of 1,324 units will come forward over the next 5 years. In light however of the questionable support which HIF money will offer within this same timescale, the significant level of infrastructure which will be required, and the absence of detail over infrastructure delivery, this is a wholly unrealistic 'vision'.
- 6.9 Additionally, albeit there are 17 new sites which have now been considered suitable outside of Hoo Peninsula, the reason for promoting these sites is not set out, even in outline, for many sites. No update is

given in respect of 10 sites. 2 sites maintain previous text outlining that the site is “*unachievable and unavailable*”. There is presently no evidence as to the suitability and availability of these sites. Absent this, these sites may only properly be considered to be undeliverable. The contribution of these sites to overall supply (totalling 895) should be removed.

7 CONCLUSION

- 7.1 In summary, it is almost inconceivable that the Council will be able to progress the Local Plan in the timescale previously outlined. Aside from programme issues, a Plan which is proposing to concentrate housing development on the Hoo Peninsula represents a fundamentally flawed approach. Development on the Hoo Peninsula is dependent on very significant infrastructure delivery and upgrading, which is primarily proposed to be funded by HIF. There is serious doubt on the ability of the Council to use the HIF money awarded, in the timescale outlined. If any one of the significant infrastructure projects were not to come forward, then the level of development would also be impacted.
- 7.2 Albeit the Draft Document includes headline opportunities, these fail to address the severe constraints associated with the level of development envisaged on the Hoo Peninsula. But one major constraint is the need for necessary infrastructure. There is a continued absence of any detailed proposals in respect of potential road and rail investment. From the bare information available timescales are already slipping in relation to the delivery of such projects.
- 7.3 The Hoo Peninsula is poorly connected by public transport. The Draft Document offers notably limited information on how this will be improved. Indeed, Four Elms Hill suffers severe congestion, and the local bus network will be severely impacted. Four Elms Hill is the subject of severe air quality concerns, with this stretch of road having been included in an AQMA. It is unknown how the Council intends to successfully develop an air quality action plan for improving air quality whilst proposing up to 12,000 homes on the Hoo Peninsula which will inevitably increase traffic movements through the AQMA.
- 7.4 Equally, as noted in the Draft Document, the pedestrian network will require significant improvement. However, no detailed information is provided. From a review of the projected HIF spend, it is uncertain how these improvements may come forward. Additionally, the development of 12,000 homes will prove transformational in landscape terms and have a severe impact on the adjacent SSSI and other protected landscapes. The green corridors and landscape buffers located between Hoo St Werburgh, Port Werburgh and Chattenden appear to be minimal. It is unclear how these will provide the necessary buffers required to adequately protect the SSSI and characteristic open landscape of Hoo Peninsula.
- 7.5 Notwithstanding the flawed approach to development on the Hoo Peninsula, the Council has continually under-delivered on their housing requirement, with an annual shortfall of 1,000 units. This emphasises the need for well-considered, plan-led delivery housing, especially during the early part of the plan period and in evidently sustainable locations.
- 7.6 Overall, the level of development envisaged on the Hoo Peninsula is unsustainable and highly unlikely to prove deliverable. Even if sustainable, projected timescales offered by the Council are wholly unrealistic.