

13 February 2024
Delivered by email

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

Dear Sir/Madam

Regulation 16 Consultation: Hoo St Werburgh and Chattenden Neighbourhood Plan

We are instructed on behalf of Richborough to respond to the Regulation 16 consultation on the emerging Hoo St Werburgh and Chattenden Neighbourhood Plan (NP).

Context

Richborough have a land interest to the north of Wainscott and have previously submitted a Vision Document to the Medway Call for Sites in February 2023, as well as a written response to the Regulation 18 Medway Local Plan 2022-2040 Consultation, in support of the site's allocation for residential development. The site is Land off Lower Rochester Road and has been given the site reference SR17 in the Medway Land Availability Assessment (LAA) (September 2023). The site lies outside of the Hoo St Werburgh and Chattenden Neighbourhood Plan Area.

The Site comprises approximately 48.3ha of land to the north of Wainscott and the Vision Document establishes that the site could be developed for 800-900 new homes with extensive greenspace and potential for the delivery of education facilities, a care home and a local centre.

Hoo St Werburgh and Chattenden Neighbourhood Plan

The emerging NP includes a Vision and Aims section that includes reference to supporting the sustainable growth of Hoo St Werburgh and Chattenden, and preserving their character and rural landscape setting while ensuring housing development is well-designed, sustainable and meets a range of local needs.

Policy HOO4: Housing Growth and Mix, expresses an intention to support residential development proposals where they are in existing built settlements, comprise residential conversions or where sites are allocated by the Local Plan.

As evidenced throughout the remainder of this letter, Richborough considers piecemeal development of Hoo St Werburgh and surrounding villages to be unsustainable. While it is noted below that there has been significant development proposed in the area, outside of the Local Plan process, Richborough remain of the

view that further residential development should come forward as part of a strategic plan for the Borough, through the emerging Local Plan process.

Medway Local Plan Consultations

A brief summary and timeline of the strategic importance that has been placed on housing delivery in Hoo in previous Local Plan consultation documents is provided below:

- A Regulation 18 consultation took place in 2018 and included four potential scenarios to meet the housing needs and in all of these, the majority of housing need was to be met through major extensions to the settlement of Hoo St Werburgh. Following this consultation, Medway secured a £170 million funding package to deliver strategic transport infrastructure and environmental projects on the Hoo Peninsula, through the Housing Infrastructure Fund (HIF).
- A Regulation 19 Pre-Submission Draft Local Plan was prepared in 2021, although Council Members voted for the consultation not to proceed as it was claimed key transport and sustainability documents were deemed to be missing. However, the Regulation 19 consultation document remained reliant on a spatial strategy which directed significant levels of housing delivery towards Hoo. The following statement in respect of supporting infrastructure was included within the document (emphasis added):

*“7.1.16. The consortia arrangement that exists between landowners involved in the sustainable expansion of Hoo St Werburgh, alongside Medway Council commitments towards early infrastructure provision and **the Housing Infrastructure Funding from Homes England provides the certainty of delivery of infrastructure which must underpin Medway’s Local Plan.**”*

- Medway Council undertook consultation on the Hoo Development Framework in summer 2022, which set out ambitions for potential growth on the Hoo Peninsula of around 10,000 homes over the next 30 years. The successful Housing and Infrastructure Fund (HIF) bid had identified highway improvements to the existing A228 and A289, including the Four Elms roundabout, as well as a new link road and the reinstatement of rail passenger services.
- Homes England withdrew the commitment to provide the HIF funding in July 2023 citing spiralling costs, value for money and scheduling issues associated with Medway Council claiming the funds.
- Medway Council have since begun preparation of a new Local Plan and in October 2023 undertook an updated Regulation 18 consultation. The consultation document did not propose a preferred spatial strategy for housing growth but a significant growth on Hoo was not ruled out. Richborough’s representations to this consultation confirmed that should allocations be proposed at Hoo, appropriate viability evidence will be required to comprehensively address and respond to the loss of HIF funding. The consultation document confirms at paragraph 5.45:

“A further strategic consideration is the capacity of infrastructure to support major growth on the Hoo Peninsula. Transport networks would need to be upgraded. The roads network is limited, with particular concerns on the capacity of Four Elms roundabout and congestion on the adjoining roads, which exacerbates air pollution. Bus services reflect the rural nature of the area, with reduced frequency compared to urban Medway. The Council will require major transport schemes to provide

for sustainable transport choice and increase the capacity of the road network, to facilitate growth on the Hoo Peninsula.”

The Regulation 18 consultation document also highlights the prominence of statutory ecological designations on the Hoo Peninsula and its importance in respect of ecology. Additionally, the required investment in local services including schools, leisure facilities and health infrastructure should significant development come forward at Hoo was also referenced.

Residential Windfall Applications in Hoo St Werburgh

Given the considerable amount of time since the Medway Local Plan was adopted in 2003, housing delivery in the Borough has become increasingly reliant on unplanned windfall development. Accelerated by the lack of a five year supply of housing in recent years, this has particularly been the case in the Hoo area and a brief summary of several of recent developments, as well as submitted applications, is provided below for context:

- Stoke Road Business Centre (ref: MC/17/4424 and MC/19/0888) - Wallace Land submitted an outline planning application for up to 200 dwellings in December 2017 on land to the south east of Hoo. A subsequent reserved matters approval was granted in July 2019 for 200 dwellings and the site is now being developed by Taylor Wimpey.
- Land south of Stoke Road (refs: MC/16/2837 and MC/18/0702) - Taylor Wimpey secured reserved matters approval for 127 dwellings to the south of Hoo in July 2018. The site has been developed and is now occupied.
- Land to the south of Stoke Road (ref: MC/19/3129) - Dean Lewis Estates Limited submitted an outline planning application for up to 100 dwellings on land to the south east of Hoo in November 2019. The application was approved in December 2022. No reserved matters application has been submitted to date.
- Land at Ratcliffe Highway (ref: MC/23/1934) - Gladman Developments Ltd submitted an outline planning application for up to 240 dwellings on land to the west of Hoo in August 2023. The application is currently awaiting determination.
- Former Sturdee Club (ref: MC/23/2857) - Esquire Developments submitted a full planning application for 134 dwellings, a children’s nursery and community hub in December 2023 on land to the south east of Hoo. The application is currently awaiting determination.

It is clear that there has been and continues to be considerable interest in developing land around Hoo. It is therefore imperative that the infrastructure to support the development is available and is brought forward in line with the phasing of any new development.

Highway Capacity and Possible Improvement Schemes

Richborough contend that the Hoo peninsula can accommodate a level of residential growth but any transformational change of this area of the Borough will be severely hampered by highway and accessibility constraints as well as the need to provide additional services and amenities. The existing highway capacity issues will need to be comprehensively addressed, including those at the Four Elms Roundabout, as part of any Local Plan that seeks to allocate a strategic level of growth at Hoo.

It is unclear from the planning history referenced above what, if any, highway infrastructure improvements are able to be delivered without the HIF funding and this needs to be assessed and clearly evidenced as part of the evidence base in support of an emerging Medway Local Plan.

There is a high dependence on private vehicles for most residents on the Hoo Peninsula, given the current relatively poor access to public transport, which further exacerbates the capacity constraints of junctions on the existing nearby road network. Future evidence base documents in support of a Local Plan will also need to clearly demonstrate how these constraints are to be overcome.

Site SR17 presents an opportunity for Medway Council to deliver junction improvements at Four Elms Roundabout that will assist in reducing congestion and potentially increase capacity for development on the Hoo Peninsula. It will also deliver a sustainable and self-sufficient extension to Wainscott on land which is not located within the Green Belt.

The Vision Document prepared by Richborough refers to improvements to the Four Elms Roundabout, including an integrated left turn lane to ease congestion at this key pinch point. This work was originally due to be funded by HIF but is now proposed to be funded and provided by promoters of SR17, which is a major benefit of the proposals and will enable Medway to strategically plan for further residential development.

The emerging Hoo St Werburgh and Chattenden NP acknowledges that residential allocations will be made via Medway Local Plan. Richborough agree with this sentiment and have highlighted some of the key supporting evidence that must be prepared to support an emerging Local Plan. It is clear that significant piecemeal development has already taken place around Hoo in recent years given the lack of an up to date Local Plan. This form of development is unsustainable without significant investment in local infrastructure; highway improvements being one of the most significant infrastructure requirements for Hoo.

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M. O'Brien

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