

## **Hoo Development Framework**

### **PUBLIC CONSULTATION**

#### **MEDWAY GREEN PARTY'S - RESPONSE**

### **Vision for Hoo St Werburgh**

Fields marked with an \* must be completed

The proposed vision for Hoo St Werburgh is presented on page 48.

Q1a. To what extent do you agree / disagree with the proposed vision?

- Agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

Q1b. Please explain your answer to Q1a:

- The Hoo Development Framework Consultation is not part of a legal planning process, and has pre-empted the development of consultations and assessments with disastrous results.
- What we desperately need in Medway is an up-to-date Local Plan suited to the needs and aspirations of the local people.
- To achieve this, we need a Planning Department properly resourced and staffed to fulfil the Council's statutory obligations.
- In the meantime, the Council are floundering around, using our money to pay for numerous consultants' reports that are meaningless without the statutory framework of a Local Plan, to support them.
- The Hoo Development Framework is one such expensive, meaningless exercise.
- One report worth noting is the Medway Strategic Flood Risk Assessment of 2020. When read in conjunction with the Thames Estuary TE2100 plan the full extent of the flood risk and tidal inundation becomes apparent.
- Those of us who remember the floods of 1953 will know the devastating impact with loss of life, disruption and damage to property and infrastructure, caused by flooding after a tidal surge.
- With rises in global temperatures and changes in weather patterns flooding from extreme weather events will become more frequent, as will tidal surges and the on-going rise in sea level.
- The Hoo Peninsula is part of the flood plain that will save London from experiencing the full impact of flooding.

- While property values in London are protected by massive infrastructure and flood plains, many properties on the Hoo Peninsula will, in their useful lifetime, become impossible to mortgage and unsaleable.
- The Hoo Peninsula will need a well-trained and equipped volunteer civil defence organisation to rescue people from floods, as our Emergency Services are chronically under-resourced.
- What we need is a fully resourced Planning Team in Medway that will be able to facilitate real participation from residents on an Engage, Discuss and Decide basis instead of the current Decide, Announce and Defend basis that this consultation is a typical example of.
- The Royal Town Planning Institute has a Code of Professional Conduct based around five core principles.
  1. Competence, honesty and integrity.
  2. Independent professional judgement.
  3. Due care and diligence.
  4. Equality and respect.
  5. Professional behaviour.

I think our Local Authority should bear this in mind when they are spending public money.
- We do not expect to find our Council, quite rightly, being made fun of in satirical magazines such as Private Eye, at our expense.
- The so-called 'Vision', comes across like something out of the 1950s and is totally removed from the reality of peoples' lives.

## Key principles

Fields marked with an \* must be completed

The proposed key principles are listed below and presented in full on pages 50 to 69.

1. Landscape-led development
2. Accessible and well-connected settlements
3. Vibrant and sustainable communities
4. Attractive and tailored built form

Q2. Please tell us what you think about any aspect of the proposed key principles.

### 1 Landscape led development

- The Hoo Peninsula is an area of incredible natural beauty, wildlife protection areas and prime agricultural land that has in the recent past been marred by inappropriate developments.
- During the brief and damaging interlude in our history when we became slaves to fossil fuels, the Peninsula was scarred by petroleum storage tanks and a polluting coal fired power station.
- Latterly, when we became slaves to materialism, the Peninsula has been marred by the construction of a Distribution Depot for online purchases at the end of a road to nowhere with consequential heavy disruptive polluting lorry traffic.

- Now, it is proposed to concrete over several square kilometres of grade one agricultural land and call it a Landscape-led development. This is the latest insult to somewhere that is an Area of Outstanding Natural Beauty in all but name.
- A large part of the Hoo Peninsula comprises Special Protection Areas for wildlife in the form of areas of Special Scientific Interest and a RAMSAR site.
- These sites have national and international protection and are likely to be impacted adversely by the proposals in the Hoo Development Framework 'Vision'.
- Such sites are also protected by millions of private individuals who are members of the numerous organisations that take the protection of our wildlife, biodiversity and future of our planet very seriously.
- Medway Council, by pursuing their 'Vision', are likely to meet with many and varied costly legal challenges to their proposals, which Medway rate payers need to be aware of.

## **2 Accessible and well-connected settlements.**

- More than half the residents of Medway need social or other supported affordable accommodation. Ref: Medway Local Housing Need Assessment 2021.
- If people on low incomes are to be housed in a remote rural area, they will need transport and they don't by definition have the funds for expensive unreliable public transport or their own vehicle.
- There is of course a proposal for a passenger rail service to Gravesend but how this will help local residents or Medway businesses and shopkeepers isn't clear.
- Very little attempt has been made to improve accessibility and connectivity within the existing settlements.
- There are already many parts of Hoo St Werburgh where it is dangerous to either walk or cycle.
- The Hoo Development Framework doesn't seem to address this question.

## **3 Vibrant and sustainable communities.**

- The Hoo Peninsula already has vibrant and sustainable communities, that are uniting to resist the bland and unsustainable over-development evident in the Hoo Development Framework.
- The Hoo Peninsula has been inhabited for several thousand years and no consideration has been given to the possible existence, for example, of the remains of Bronze Age Settlements.

## **4 Attractive and tailored built form.**

- The notion that a volume house builder will produce an attractive and tailored built development is an insult to peoples' intelligence when all they see around them is standard badly designed, cramped and poorly insulated houses with no thought given to orientation, location or outlook.

- If the Government is to fulfil the pledges it has made on carbon emission reductions, every one of the houses built will need expensive retro-fitting with carbon reducing technology within the next few decades.
- These same volume house builders, that will be bringing the 'Vision' to fruition, have been instrumental in fighting against every attempt to improve national heating and insulation standards.

## Overall Framework Plan

Fields marked with an \* must be completed

The proposed Overall Framework Plan is presented on pages 72 to 75.

Q3a. To what extent do you agree / disagree with the Overall Framework Plan?

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

Q3b. Please explain your answer to Q3a:

- Everyone is entitled to a secure, safe and comfortable place to live, whatever their circumstances.
- At the same time, we all need to eat and must conserve our farmland and reduce our dependence on imported food.
- We also share our environment with a multitude of plants and creatures that all add to our well-being and need our protection.
- We believe we must build the right houses in the right place.
- What are the right houses?
  1. Houses of the right size.
  2. In the right numbers.
  3. At the right price.
  4. Well insulated and economical to heat.

AND
- What are the right places?
  1. The right places to meet local need.
  2. On previously developed land.
  3. Close to existing facilities and services.
- The Framework Plan is a good example of proposing to build the wrong houses in the wrong places.

## Neighbourhoods

Fields marked with an \* must be completed

The proposed neighbourhoods are presented on pages 78 to 114.

**Q4. Please tell us what you think about any aspect of the proposed neighbourhoods.**

- The proposed neighbourhoods are sited where recently there had been crops growing and animals grazing.
- Volume house builders encouraged by the Hoo Development Framework have taken out options to buy the farmland identified in the consultation documents.
- Many of these farms are now abandoned, there are no crops, no animals, and no jobs for the people who, until recently, had dedicated their lives to growing our food.
- The damage to people, our local community and national food security is immense.

## **Any other comments**

Fields marked with an \* must be completed

**Q5. Do you have any other comments?**

- At the time the 'Vision' was being formulated, we had a Prime Minister who went round touting a need to build 300,000 houses a year in England. He was using a house building target, created with out-of-date statistics, by Homes England as part of something called the 'standard method'.
- The standard method uses a formula that relates the predicted increase in the number of households to average house prices and average incomes in an area, to assess their affordability.
- Bizarrely, the formula suggests that the less affordable the houses, the more would then need to be built.
- The 'standard method' is known in the construction and planning professions as the 'mutant algorithm'
- The Office for National Statistics have long been saying that we only need half the number of houses to be built and they have since been proved correct by the results of the 2021 National Census.
- The current Prime Minister, Rishi Sunak is evidently better at arithmetic than his predecessors and on Wednesday 9<sup>th</sup> November 2022 stated in the House of Commons that there would be no more government-imposed housing targets and that local housing need would be assessed and decided locally.
- So how many dwellings do we actually need when our population density is already four times that of some neighbouring local authorities?  
The Office for National Statistics says Medway's population is increasing by 0.6% a year.  
This means that our existing 111,458 households (2021 census) will also increase by 0.6% giving us a baseline of around 669 dwellings annually.  
To this we need to add an allowance to reduce the existing Council House Waiting List, to arrive at a realistic figure closer to the 2003 Local Plan housing target of 867 dwellings.
- On Wednesday 26<sup>th</sup> October 2022 Rishi Sunak stated that all new house building would be on brownfield sites and that we would protect our precious green spaces.

- The whole foundation upon which the 'Vision' for Hoo was created is now no longer government policy.
- But fortunately, Medway has brownfield sites.
- Medway has 'previously developed land' in stunning locations that other local authorities can only dream of.
- Unfortunately, so far, little imagination has been used re-developing these sites and the results are depressing.
- The Medway Local Housing Needs Assessment 2021 investigated at great length and in great depth the housing unaffordability issue for Medway residents.
- The Local Housing Need Assessment report stated that they were forced to adopt the 'standard method' to assess local housing need, so it wasn't actually an assessment of the real situation.
- Unfortunately, all that work will now need to be done again, but that must be part of the Local Plan process.
- The lack of a Local Plan and the fact that the 'emerging local plan' has been going backwards rather than progressing, such that it is still at an early stage, is significant.
- The 'Vision' for the Hoo Peninsula relied on the granting of a Housing Infrastructure Fund Award from the public purse.
- There are four eligibility criteria to get the funds awarded, the bid must:
  1. *Require grant funding to deliver physical infrastructure and provide strong evidence that the infrastructure is necessary to unlock new homes and cannot be funded through another route.*
  2. *Support delivery of an up-to-date plan or speed up getting one in place.*
  3. *Have support locally.*
  4. *Spend the funding by 2020/21*

Medway's Housing Infrastructure Fund bid fails on three out of the four criteria.

Happily, the Housing Infrastructure Fund money will no longer be necessary.

- However, houses are currently being built at Hoo St Werburgh and the existing infrastructure for sewers, stormwater drainage and flood protection is being over-whelmed, with resulting widespread pollution and risk to health.
- Medway Council must stop all building work until the existing infrastructure has been rectified and improved, paid for by the developers.
- Please contact the Medway Green Party for more details.

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**For Medway Green Party.**