



**Cllrs. Crozer, Pearce and Sands
The Independent Group
on Medway Council
Hoo & High Halstow Ward**

C/O 17 Grandsire Gardens,
Hoo,
Hoo Peninsula,
Rochester,
Kent,
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Tuesday 31st October 2023

Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

CC: Officers - Dave Harris (Chief Planning Officer), Catherine Smith (Head of Planning Policy) and Richard Hicks (Chief Executive). Members - Cllr. Stephen Hubbard (Chair of the Planning Committee), Cllr. Chrissy Stamp (Deputy Chair of the Planning Committee), Cllr. Simon Curry (Portfolio Holder for Climate Change and Strategic Regeneration), Cllr. Vince Maple (Leader of the Council) and Cllr. Teresa Murray (Deputy Leader of the Council).

Re: Medway Council Local Plan Regulation 18 Consultation (2023) - Setting the direction for Medway 2040

Dear Medway Council,

We write to you as the three Independent Councillors for Hoo and High Halstow Ward on Medway Council - representing the communities of Chattenden, High Halstow and Hoo on the Hoo Peninsula. This is our representation to the Council's Local Plan Regulation 18 Consultation (2023) - Setting the direction for Medway 2040.

Background and context.

The Council formerly restarted the Local Plan process in October 2022 and has recently carried out a new Call for Sites. This decision has brought us to the Regulation 18 document currently being consulted on. The clarity regarding the Council **NOT** having a preferred strategy or a list of preferred sites at this early stage is very welcomed.

The Council has attempted three times to replace the 2003 Local Plan. The first attempt in 2007 and the second attempt in 2013 both reached Independent Examination stage but had to be withdrawn after being found 'Unsound' by the Inspector - both of these focused significant development on the Hoo Peninsula. The third attempt was in 2021 with a tabled draft Local Plan, to be approved by members, but this was later withdrawn - this plan also focused significant development on the Hoo Peninsula.

Lodge Hill.

In 2013 the Council submitted its Core Strategy (Local Plan) for Independent Examination. The centrepiece of this plan was a proposal for a new town, consisting of 5,000 houses, to be built on a Nightingale bird sanctuary at Lodge Hill. This plan attracted national controversy for the Council, particularly when Lodge Hill was declared a Site of Special Scientific Interest (SSSI) the same year.

The Council challenged Natural England during its decision-making process to designate the site and was found to have presented inaccurate information at that hearing. The Inspector declared the Council's plan 'Unsound'

and was not convinced there were no reasonable alternatives within the Local Plan area to the Lodge Hill allocation. The Council had not appraised other options to the same degree as the focus on the Hoo Peninsula.

Despite the Lodge Hill episode, the Council's Planning Committee approved a planning application to build 5,000 houses on the Nightingale bird sanctuary in 2014. This decision was called-in for a public inquiry but the developer withdrew the application. In 2019, Medway Council declared a Climate Emergency and Homes England is, for now, the custodians of the Lodge Hill site.

Neighbourhood Plans.

The communities of Chattenden, High Halstow and Hoo have been working on producing Neighbourhood Plans. The High Halstow Neighbourhood Plan has reached Regulation 16 and the Hoo and Chattenden Neighbourhood Plan has reached Regulation 14. Both Neighbourhood Plans are highly likely to be found 'Sound' and be adopted before Medway Council's new Local Plan.

There are a number of emerging policies within both Neighbourhood Plans that will need to be taken into account by Officers when producing the new Medway Council Local Plan. One of these key policies is the protection of the Chattenden Valley, a highly valued landscape between Chattenden and Hoo. This strategic green corridor protects the two settlements from coalescence and urban sprawl.

The Hoo Peninsula today.

The Hoo Peninsula is home to a wide range of internationally and nationally protected wildlife and habitat sites. These include Special Protection Areas (SPAs), Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat (RAMSAR) sites and Sites of Special Scientific Interest (SSSI). There is also a National Nature Reserve (NNR) on the Hoo Peninsula.

Over 300,000 migratory birds visit the area each year and we are home to the largest heronry and nightingale populations in Britain. There are also very healthy populations of Purple Emperor Butterfly, Water Voles, Great Crested Newts, Door Mice and Slow Worms - representing our incredible local biodiversity.

The Hoo Peninsula has a strong farming presence that sustains an agricultural economy and contributes to national food security. Several small and medium sized farmers locally supply a variety of high-quality crops to high/medium-end supermarkets such as Waitrose, Marks & Spencer and Sainsburys. Strawberries grown on the Hoo Peninsula for example are supplied to the tennis tournament at Wimbledon in London.

The Hoo Peninsula has recently transitioned through a period of industrial decline, concluding with the demolition of the iconic legacy power stations and their chimneys at Grain and Kingsnorth. Heavy industries such as oil refineries have also disappeared from the area. Perceptions of the Hoo Peninsula have changed significantly with the area now widely associated with the natural world and wildlife rather than heavy industry.

Deangate Ridge, including the former golf course site and present running track site, is a highly valued public green space at the heart and centre of the Hoo Peninsula. The site now acts as an unofficial country park and green lung to benefit the residents of the Hoo Peninsula and further afield, such as Strood. A number of protected species and rare grasses have recently been found on the Deangate Ridge site.

The Hoo Peninsula is significantly constrained by very poor transport infrastructure capacity and substantial environmental habitat sites. The level of growth being promoted by landowners/developers is not sustainable without herculean, and arguably unviable, financial state intervention to manage increased pressures on infrastructure, services and to mitigate and compensate environmental impacts of development.

Aspirations for the Hoo Peninsula.

The Hoo Peninsula must retain a strong and versatile farming economy and rural villages community. Our small and medium sized farmers in particular need to be supported and be recognised for the contribution they make to the economy and food security. Agricultural greenfield sites form Valued Landscapes (VLs) that separate villages on the Hoo Peninsula - preventing coalescence and urban sprawl.

Our area's incredible wildlife and beautiful habitat sites need to be a key priority and be protected from the direct and indirect impacts of development. Officers will need to demonstrate the Avoid, Mitigate and Compensate Hierarchy (AMCH) has been followed when selecting sites. Sites where development would negatively impact habitats should be selected as a last resort once other development options within the Local Plan area have been exhausted.

The new administration and members of the Council support the proposed East Coast Wetlands designation as a United Nations Educational, Scientific and Cultural Organization (UNESCO) Natural World Heritage site. This designation would include wetland and marshland habitat surrounding the Hoo Peninsula and within the Medway Estuary. The East Coast Wetlands proposal has already made it onto the UK's Tentative List and would be significant for the Hoo Peninsula if granted.

The remaining valued landscape of the Hoo Peninsula should become an Area of Outstanding Natural Beauty (AONB) and extension to the Kent Downs AONB, via Higham and Shorne. This ambition recognises the natural beauty of the Hoo Peninsula, most of it already worthy for Natural World Heritage Site status, and is supported by the new administration of the Council.

The Hoo Peninsula should benefit from increased green tourism to showcase our beautiful landscape and fantastic habitat sites. This increase in footfall around the Hoo Peninsula should be very carefully managed to ensure there isn't Recreational Disturbance (RD) and harm to wildlife. The Hoo Peninsula's internal transport connections need to be improved with better Public Rights of Way (PROWs), footpaths, roads and circular bus links to connect and serve our rural community.

Lower Thames Crossing (LTC) and the Strategic Road Network (SRN).

The potential impacts from the proposed Lower Thames Crossing (LTC) on the Strategic Road Network (SRN) and Local Road Network (LRN) is a critical constraint to development. This is a particular issue for the Hoo Peninsula and Strood with the potential impacts on the M2 Junction 1, Wainscott By-pass (A289) and Four Elms Roundabout. Traffic flow graphics from various consultations on the LTC show significant increases in traffic flows/trips on these roads and junctions.

As matters stand, there will not be the highway transport capacity to accommodate promoted growth on the Hoo Peninsula and Sustainable Development would not be achieved. The harms of permitting development would significantly and demonstrably outweigh the benefits of providing housing in this location. National Highways and Active Travel England are already submitting holding objections to live planning applications on the Hoo Peninsula.

Officers should strongly demonstrate to an Inspector at Examination that the Council has a genuine and justified reason for bringing forward a Local Plan that reflects lower levels of growth - because of the significant constraints to growth that exist and the potential inability to adequately mitigate services, transport and environmental impacts or to compensate harm.

Standard Methodology and potential housing capacity.

We believe there should be greater flexibility for calculating Local Housing Need (LHN). Officers at Medway Council would then be able to choose a figure ranging from 282 to 1565 houses a year. Even if the Council was able to use more up-to-date figures this would result in a reduction of around 5,700 houses needed over the plan period (up to 2040) - this is approximately the scale of development being promoted in Hoo alone.

The need to allocate sites for 19,173 new houses can potentially be met with the Urban Regeneration sites (11,151 houses) - such as Strood Riverside, Rochester Riverside and Chatham - and Suburban Growth sites (9,680 houses) - such as Capstone Valley, North Rainham and East Rainham - alone.

In other words, no Hoo Peninsula sites need to be allocated to meet the stated housing need. This is especially important when considering that Officers will need to demonstrate they have followed the Avoid, Mitigate and Compensate Hierarchy (AMCH), with regards to avoiding harm to the Hoo Peninsula's sensitive wildlife habitats, when selecting sites for development.

Next steps for Medway Council.

The Council's ambition to submit a draft Local Plan for Independent Examination by the end of next year (2024) is far too optimistic. The Council has restarted the Local Plan process with a new Call for Sites and is consulting on a Regulation 18 document that is very light on detail and contains no draft policies. There is also a lack of supporting evidence as this is still in production and will take time to process.

Following this consultation, the Council should draw up a number of spatial strategies and reasonable alternatives and score these against each other and the Sustainability Appraisal (SA) using proportionate evidence. There will need to be another round of Regulation 18 consultation on these options before progressing to a Regulation 19 draft Local Plan with a preferred option.

The Council is at risk of progressing to Regulation 19 too quickly and this may present challengeable grounds to the Local Plan at Independent Examination. Officers should look at the following broad options - these represent the only realistic spatial strategies and reasonable alternatives that can be appraised and scored against each other, particularly on environmental impacts.

Option 1: Urban Regeneration and Suburban Growth - capacity for up to 20,831 houses.

Option 2: Urban Regeneration and Rural Development - capacity for up to 25,887 houses.

Option 3: Urban Regeneration and a mix of Suburban Growth and Rural Development - capacity for approximately up to 23,359 houses.

The Council will need strong and robust evidence to support its eventual chosen spatial strategy and preferred sites. This spatial strategy must be appropriate and justified and the evidence will be heavily scrutinised and potentially challenged at Independent Examination. We would like to stress that we want a new Local Plan in place for the authority. However, this plan must be robust, evidence led, constitute sustainable development and be able to stand up to scrutiny.

There's absolutely no point submitting a vulnerable Local Plan for Independent Examination.

In conclusion.

We thank Officers for producing and consulting on this Regulation 18 document. Our more detailed response is outlined within the comments table below. We remain very concerned with, and strongly oppose, the scale of residential and commercial/industrial development being promoted on the Hoo Peninsula by landowners/developers. The impacts and harm of allowing this development would significantly and demonstrably outweigh the benefits.

We wish to provide a separate representation in due course responding to the Council's latest Strategic Land Availability Assessment (SLAA) - this will include a desktop appraisal of sites. We will also be submitting representations and comments on the Habitats Regulation Assessment (HRA) scoping report and Sustainability Appraisal (SA) scoping report that have recently been published.

Yours faithfully,

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Consultation document:	Response:
Introduction	
Page 2. Paragraph 1.4 <i>“This consultation does not detail policies or identify those sites preferred by the Council for new development. That detail will come in the next stage of work on the Local Plan, which the Council will publish next year.”</i>	The Council has restarted the Local Plan process, including recently carrying out a new Call for Sites. In October 2022 Officers provided a planning policy update to Cabinet and stated in their report (page 2, paragraph 2.3): <i>“It is considered appropriate to provide an additional stage of consultation at ‘Regulation 18’ on the emerging Local Plan, before the Council confirms its preferred development strategy in the draft plan at ‘Regulation 19’”.</i> This decision has brought us to the Regulation 18 document currently being consulted on. The clarity regarding the Council NOT having a preferred strategy or a list of preferred sites at this early stage is very welcomed. Land promoters and/or developers on the Hoo Peninsula are currently referring to previous work undertaken by the Council, such as previous Regulation 18 consultations, the Housing Infrastructure Fund (HIF) Project or the Hoo Development Framework, in order to justify their live planning applications. This should be afforded little to no weight in planning terms as the work is either out of date, been withdrawn or doesn’t constitute formal planning policy.
Context	
Page 4. Paragraph 2.5 <i>“Climate change is a global emergency but needs to be addressed at all levels. Medway as a coastal area is particularly vulnerable to rising sea levels, and changes in temperature and precipitation have impacts for landscape, food production, nature and people. The new Local Plan will help to secure a more resilient future for Medway.”</i>	We agree with this statement. The Hoo Peninsula is particularly vulnerable to rising sea level rises as identified by the Department for Environment, Food & Rural Affairs and the Environment Agency with regards to their Isle of Grain Policy Unit: Thames Estuary 2100 and North Kent Marshes Policy Unit: Thames Estuary 2100. The Council will need to create a River Strategy to comply with this. Riverside strategies should be an integral part of statutory local planning. They can be standalone documents or form part of a Local Plan. The Council needs to create them in collaboration with local communities. They should include community ambitions for the riverside. Riverside strategies need to be in place by 2030. This will enable authorities to plan future flood defence upgrades in line with these visions. In some places in the outer estuary, they will need to be in place earlier. This is because planning for defence raising will need to start before 2030.
Page 5. Paragraph 2.10 <i>“This consultation document has been drawn up following the withdrawal of Government funding from</i>	The Council’s £170m Housing Infrastructure Fund (HIF) Project was designed to increase infrastructure capacity and provide environmental mitigation in order to enable development to come forward on the Hoo Peninsula. This growth, being promoted by

<i>the Housing Infrastructure Fund (HIF) for strategic transport and environmental schemes. The HIF programme sought to get key infrastructure in place ahead of growth coming forward in Medway. It is widely recognised that the existing transport networks are under pressure across Medway and upgrades are needed to cope with increased journeys that will come as Medway's communities and businesses expand. Infrastructure and environmental concerns are at the forefront of the Council's work on the new Local Plan. The withdrawal of the HIF funding means that the Council will look at alternatives for securing investment in transport and green infrastructure across Medway, as these remain strategic matters central to the new Plan."</i>	developers/landowners, would otherwise be deemed unsustainable in the absence of such intervention. The Council recognises this significant constraint to growth on the Hoo Peninsula within the Business Case it submitted to Homes England in March 2019. Page 41 of this document states: <i>"Dependent development testing has indicated that the current transport infrastructure can theoretically support a maximum of 2,000 homes across the Hoo Peninsula. However, the Council would be minded not to grant planning permission above the 940 homes that currently have planning permission on the Peninsula. The Council recognises that this would be forgoing the opportunity for an additional 1,060 homes on the Peninsula. However, the Council believe that any further development without upgrading the existing social and transport infrastructure, including the SEMS, would create a significant dis-benefit to existing users."</i> It should be noted that since March 2019, the Council has granted consent to further residential and commercial/industrial development on the Hoo Peninsula and the maximum capacity limit may have now been reached. The Council will need to carry out infrastructure capacity testing across the Local Plan area, including the Hoo Peninsula, in order to establish an up-to-date baseline position and the development capacity that exists today in every area. The Council will then also need to establish what infrastructure capacity upgrades (and their costs) would result in what increases in housing capacity for all areas. We welcome that the Council will look at potential infrastructure upgrades and environmental mitigation measures across the Local Plan area, rather than just focusing, as before, on the Hoo Peninsula in order to meet the challenging housing figure set by Government.
Vision for Medway in 2040	
Page 6. Paragraph 3.1 *The whole section setting out the vision for Medway in 2040*	The Council is very clear with its aspirations for the urban area of the Medway Towns, particularly with regards to becoming a city - physically and being recognised as such. Regardless if we agree or disagree with the Council's aspiration to become a city, the aspirations for the rural community, particularly the Hoo Peninsula, needs to be included in the overall vision. We welcome the Council recognising the valued landscape and countryside of the Hoo Peninsula, as well as the local heritage, coastline/riverside and natural/wildlife assets. Offices will be aware of the relevant policies within the National Planning Policy Framework (NPPF) concerning these qualities,

	particularly Areas or Assets of Particular Importance (AAPIs) and Valued Landscapes (VLs). The Hoo Peninsula has a strong farming presence, as recognised later in the consultation document, and Officers may be aware that several small and medium sized farmers locally supply a variety of high-quality crops to high/medium-end supermarkets such as Waitrose, Marks & Spencer and Sainsburys. Strawberries grown on the Hoo Peninsula for example are supplied to the tennis tournament at Wimbledon in London. The Council should include the following rural aspirations for the Hoo Peninsula within the vision. • Maintaining a strong and versatile farming economy and rural villages community on the Hoo Peninsula - with particular support for small and medium sized farmers. • For the wetlands and habitat sites around the Hoo Peninsula, and within the Medway Estuary, to become a Natural World Heritage Site - part of the proposed East Coast Wetlands designation. This is supported by all Councillors. • For the remaining landscape of the Hoo Peninsula to become an Area of Outstanding Natural Beauty (AONB) - an extension of the Kent Downs (AONB) via Higham and Shorne. This is supported by the new administration. We recognise that AONB status would not prevent all development, but the designation does create another constraint that needs to be considered when determining planning applications or for Local Plan making.
Strategic objectives	
Page 10. Paragraph 3. <i>“To secure the ongoing benefits of Medway’s regeneration, making the best use of brownfield land, and bringing forward the transformation of the waterfront and town centre sites for high-quality mixed-use development, and a focus for cultural activities.”</i>	We agree with this statement. Apart from the Chatham Docks allocation, the brownfield urban regeneration sites and proposed riverfront development throughout the Medway Towns represents the least politically controversial aspect to a potential spatial strategy. These sites still need to score highly with regards to the Sustainability Appraisal (SA) and be available and achievable/feasible for development.
Developing a Spatial Strategy	
Page 11. Paragraph 5.1 <i>“The Local Plan will include a Policies Map, which will show how land is allocated for new development, such as housing and employment, and where land is protected, such as environmental designations for nature and landscape. The Policies Map and Key Diagram help to communicate Medway’s spatial strategy – how we are planning for the future.”</i>	The Council will need to map and protect from development the internationally and nationally protected wildlife sites here on the Hoo Peninsula - such as the Special Protection Areas (SPAs), RAMSAR sites, Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs). In terms of protected landscapes, the Medway Council 2003 Local Plan includes Areas of Local Landscape Importance (ALLIs) - some of these ALLIs

	are present on the Hoo Peninsula. The Council should review these and designate new Valued Landscapes (VLs), including the Chattenden Valley between Chattenden and Hoo. We can provide a suggested designation map showing this area and its context.
Page 11. Paragraph 5.2 <i>“A Local Plan should be positively prepared for sustainable development. It should not be used to stop development that is needed for our growing and changing communities. The Plan should seek to direct and manage growth, so that it provides land for homes, jobs and services, as well as protecting the area’s natural resources and historic features.”</i>	From the outset, a local plan MUST be positively prepared for Sustainable Development if it is to be found ‘Sound’ at Examination. However, the Sustainability Appraisal (SA), other supporting evidence and local constraints may make it impossible to meet the required housing numbers in a sustainable way. This position would need to be supported by significant evidence and justification in order to be accepted by an Inspector. We believe the constraints, particularly on the Hoo Peninsula, haven’t been properly taken into account with previous Local Plan work undertaken by the Council. At some point there may be a situation where the Council can’t physically meet local housing need. This is because there isn’t enough availability of suitable and achievable sites being promoted or/and these sites can’t be developed in a sustainable way and therefore can’t be brought forward.
Page 11. Paragraph 5.3 <i>“Government directs Local Planning Authorities to use its ‘Standard Method’ in determining the scale of housing needed over the plan period. This Standard Method formula for Local Housing Need identifies a need for 1,667 homes a year in Medway, or around 28,500 over the plan period to 2040. This level of housing need is greatly higher than rates of housebuilding seen in Medway for over 30 years. The formula reflects dated demographic projections and has been heavily criticised across the country and there is currently some uncertainty with Government policy. At the time of writing, the Government had not yet published its response to the consultation on revisions to the National Planning Policy Framework, which included consideration of the Standard Method formula.”</i>	We agree with this statement. We believe there should be greater flexibility so Councils can choose a Demographic Scenario or method to produce its Local Housing Need (LHN) figure for a Local Plan. Officers at Medway Council would then be able to choose a figure ranging from 282 to 1565 houses a year. Interestingly, even if the SNPP-2014 figure of 1,333 houses a year was used, this would result in a reduction of around 5,700 houses needed over the plan period (up to 2040) - this is approximately the scale of development being promoted in Hoo. The current level of housebuilding exceeds the vast majority of Demographic Scenarios/methods outlined in the Medway Housing and Demographics report 2021. Therefore, being directed by Government to use the Standard Methodology for calculating LHN is arguably unreasonable in Medway Council’s case. From a starting point, the Standard Methodology directs the Council to plan for a scale of growth equivalent to an incredible thirty-six High Halstow villages over the plan period (based upon present day High Halstow containing approximately 800 dwellings). Officers will be aware of paragraph 61 of the NPPF regarding the very issue: <i>“Local housing need: The number of homes identified as being needed through the application of</i>

	<i>the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework)."</i> <i>"61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."</i> We're not convinced that the Council has effectively argued its case to Government for having exceptional circumstances that would justify an alternative approach. This consultation document itself outlines the exceptional constraints and unique issues when it comes to producing a Local Plan for the area.
Page 12. Paragraph 5.5 <i>"The Council will be reviewing the outcomes of Government consultations and anticipated policy updates in preparing the draft Local Plan for publication next year."</i>	We agree with and welcome this statement. Officers should apply any new flexibility or favourable NPPF policy changes to any emerging draft Local Plan.
Page 12. Paragraph 5.6 <i>"The Council is collating a comprehensive evidence base to inform the new Plan. All potential sites will be assessed for their ability to deliver sustainable development, considering constraints and mitigations, and how they could meet the objectives of the Sustainability Appraisal and objectives for the Plan. The Council needs to demonstrate that the growth strategy set out in the Plan can be delivered, to provide certainty and confidence in Medway's growth. Potential sites and locations will be tested against a range of criteria, including transport impacts and viability."</i>	We agree with this statement. Officers will be aware of paragraph 32 of the NPPF concerning the Avoid, Mitigate and Compensate Hierarchy (AMCH): <i>"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."</i> The Hoo Peninsula is the most environmentally sensitive part of the Local Plan area with a wide range of internationally and nationally designated wildlife sites. The scale of proposed growth being promoted by landowners/developers on the Hoo Peninsula will have a significant adverse impact on these wildlife sites, particularly with regards to Recreational Disturbance (RD). Officers will need to demonstrate

	that they have followed the AMCH when selecting sites for development. Theoretically, most of the sites being promoted for development on the Hoo Peninsula should only be selected as a last resort once other development options within the Local Plan area have been exhausted.
Page 12 and 13. Paragraph 5.7 <i>“Work to date has highlighted some critical constraints. National Highways has indicated that there is insufficient capacity in parts of the Strategic Road Network to accommodate significant growth. National Highways has identified capacity and safety concerns with M2 Junction 1. Although this is outside of Medway’s boundary, it is a key junction for the area, and many residents and workers travel through this junction regularly. There are no plans to upgrade this junction as part of National Highway’s plans for the Lower Thames Crossing (LTC). Without a clear scheme in place to address these issues, development of jobs and homes across north and mid-Kent will be stymied. The Council is working with neighbouring authorities and wider stakeholders to prioritise action on M2 Junction 1. This matter would need to be addressed in the Local Plan, with policies showing how impacts could be mitigated and improvements delivered.”</i>	We agree with this statement. It's important to point out that the Council's £170m Housing Infrastructure Fund (HIF) Project did not deal with these critical constraints, particularly the M2 Junction 1. In other words, even if infrastructure capacity was improved for journeys on and off the Hoo Peninsula, there would still be an infrastructure capacity issue for when most of this vehicle traffic approached the M2 Junction 1 from all directions. The capacity issue at the M2 Junction 1 is a critical constraint for potential development allocations on the Hoo Peninsula and this will need to be taken into account before selecting sites. It may not be possible to fully mitigate the impacts of development on the M2 Junction 1 as adequate improvements may not be physically possible or financially viable. The constraints within the Local Plan area may create a ceiling on the amount of growth that can actually be permitted in order to achieve Sustainable Development.
Page 13. Paragraph 5.8 and 5.9 <i>“In addition to this current issue, further transport impacts are expected with the development of the LTC. The LTC is focused on a defined scheme for its primary route and tunnel. The scheme does not provide for improvements that may be needed to parts of the surrounding roads network that would be impacted as a result of the new crossing. The new crossing is forecast to generate new trips, as well as re-routing existing journeys, as drivers divert from Dartford.”</i> <i>“This is a particular concern for Medway, as the modelling assumptions used in planning for the LTC underestimate the amount of development growth that would be expected in the new Local Plan. There are concerns that the road network will not have the capacity to accommodate the higher levels of homes and jobs planned in Medway. This raises uncertainty for the capacity of the highway network to meet the full scale of development needs over the plan period. This could be a strategic constraint to development and the Plan would need to reflect lower levels of growth in Medway, with the consequent impact on delivery of new jobs and homes to Medway’s need and related affordability of homes.”</i>	We agree with both statements. The potential impacts from the proposed Lower Thames Crossing (LTC) on the Strategic Road Network (SRN) and Local Road Network (LRN) is a critical constraint. This is a particular issue for the Hoo Peninsula and Strood with the potential impacts on the M2 Junction 1, Wainscott By-pass (A289) and Four Elms Roundabout. Traffic flow graphics from various consultations on the LTC show significant increases in traffic flows/trips on these roads and junctions. As matters stand, there will not be the highway transport capacity to accommodate promoted growth on the Hoo Peninsula and Sustainable Development would not be achieved. The harms of permitting development would significantly and demonstrably outweigh the benefits of providing housing in this location. National Highways and Active Travel England are already submitting holding objections to live planning applications on the Hoo Peninsula. Officers should strongly demonstrate to an inspector at Examination that the Council has a genuine and justified reason for bringing forward a Local Plan that reflects lower levels of growth - because of the significant constraints to growth that exist and the potential inability to adequately mitigate impacts.

Page 13. Paragraph 5.10 <i>“Further consideration will be given to potential impacts on the environment, especially the designated habitats and landscapes which form a large part of Medway’s area, and strategic infrastructure needs. The Council will need to assess how negative impacts can be avoided, or mitigated, such as through delivery of new services.”</i>	We partly agree and partly disagree with this statement. We believe potential impacts on the environment should be the primary consideration at the forefront of the site selection process. As mentioned previously, Officers will need to demonstrate the Avoid, Mitigate and Compensate Hierarchy (AMCH) has been followed when selecting sites. Negative impacts should be avoided first by pursuing alternative options/sites/locations for development that reduce or eliminate such impacts. Sites where development would negatively impact nearby designated habitats should be selected as a last resort once other development options within the Local Plan area have been exhausted.
Page 14. Paragraph 5.14 <i>“This is a high level of need and the Council has carried out a comprehensive and iterative review of potential sources of land for development allocations. The Council has produced a Land Availability Assessment (LAA) to be published with this consultation document. The LAA has been informed by a Call for Sites, where the Council invited developers, landowners and other parties to put forward sites for consideration as potential development allocations. Planning officers also identified sites from other sources, such as development briefs, the Brownfield Land Register and withdrawn planning applications. An initial high-level assessment has screened out sites that are too small. Further work will consider the scope for overcoming constraints to achieve sustainable development.”</i>	We agree with this statement. Officers have published the latest Strategic Land Availability Assessment (SLAA) document, consisting of thousands of pages, a week or so into the Regulation 18 consultation period. We would like to provide a detailed representation concerning this document, including a desktop appraisal of sites. However, because of the amount of work required, this will be submitted after the deadline for the Regulation 18 consultation. Officers should consider an extension to the consultation because of the delay in publishing the SLAA.
Page 14 and 15. Paragraph 5.15 <i>“The LAA has identified land with the potential capacity for c.38,200 homes, which will proceed to the next stage of detailed assessment, along with the Sustainability Appraisal process. Many of these sites are subject to constraints, including environmental considerations, infrastructure requirements and viability. It is likely that many of these sites will not be found suitable, available and achievable for sustainable development and will be removed at the next stage of assessment and Sustainability Appraisal. A range of mitigation measures will be required to achieve the scale of housing needed for the Plan. The scale of proposed growth is anticipated to have significant impacts across Medway. This level of housebuilding would mean the transformation of urban centre and waterfront areas and large-scale development in suburban and rural areas.”</i>	We agree with this statement. The scale of development being promoted on the Hoo Peninsula will have a significant impact on internationally and nationally designated habitat and wildlife sites locally, particularly with regards to Recreational Disturbance (RD). It may not be possible for these impacts to be mitigated, including by Strategic Environmental Management Schemes (SEMS), and therefore the harm should be firstly avoided by allocating the development elsewhere in the Local Plan area.
Page 15. Paragraph 5.16	We agree with this statement.

<i>“The Council has identified four broad categories of locations where development could take place, reflecting Medway’s geography. Indicative housing capacities from the LAA for the different areas are presented for each category (Note, this is NOT allocating numbers to allocated sites but merely reflects the LAA):”</i>	This document makes very clear that this isn't a Regulation 18 consultation on site allocations, reasonable alternative scenarios or a preferred spatial strategy at this stage. However, Officers should work towards creating a number of different spatial strategy options and for these scenarios and reasonable alternatives to be judged against the Sustainability Appraisal (SA) and published as a Regulation 18 consultation. From this a preferred spatial strategy should then be selected and taken through to Regulation 19 as the draft Local Plan. The intention by Officers to move straight to a Regulation 19 draft Local Plan consultation next year, following this very early stage in the process Regulation 18 consultation, is too optimistic and may create a vulnerability with the Local Plan being challenged and NOT being found ‘Sound’ at Examination.
Page 15. Paragraph 5.16 *Potential Housing Capacity (from LAA) table*	What is immediately clear from this table is the need to allocate sites for 19,173 new houses over the Local Plan period can potentially be met with the Urban Regeneration (11,151 houses) and Suburban Growth (9,680 houses) category sites alone. In other words, no Rural Development category sites need to be allocated to meet the housing need over the Local Plan period. This is especially significant when considering that Officers will need to demonstrate they have followed the Avoid, Mitigate and Compensate Hierarchy (AMCH), with regards to the Hoo Peninsula’s sensitive wildlife areas, when selecting sites for the Local Plan. Because of the significant environmental constraints locally, site selection should be predominantly weighted towards urban regeneration and suburban growth sites as a first priority.
Category: Urban Regeneration	
Page 16 and 17. Paragraph 5.19 <i>“The new Local Plan will draw on the existing policies, strategies and programmes that promote the regeneration of Medway’s urban centres and waterfront. This work creates a supportive policy environment for redevelopment in these areas. In drawing up the growth strategy for the new Plan, the Council’s starting point is regeneration and making the best use of vacant or under-utilised brownfield land. Sites which are already identified in Council documents such as the town centre masterplans for Chatham, Gillingham and Strood, and development briefs for Strood Waterfront, are likely to be included as site allocations in the new Local Plan. Such sites could deliver thousands of homes, as well as commercial floorspace for businesses and services and contribute to our wider strategies for supporting</i>	We agree with this statement. Apart from the Chatham Docks allocation for either residential development or commercial/industrial development, the remaining sites of the Urban Regeneration category is the least politically controversial area of the Local Plan area. We agree with Officers that the starting point for allocating sites should be those within the Urban Regeneration category. These sites are all brownfield sites or Previously Developed Land (PDL) with no environmental designations. These sites will still need to score highly when judged against the Sustainability Appraisal (SA) and be viable and achievable.

<i>our high streets and centres in adapting to wider changes in retail patterns.”</i>	
Page 17. Paragraph 5.21 <i>“In addition to these sites, the Council is also considering the potential for wider development in urban waterfronts. Land has been promoted for redevelopment at Chatham Docks and Medway City Estate. These large sites could provide for new homes as well as workspace for businesses and services. Such major redevelopment would have a marked impact on the area and would involve the relocation of existing businesses.”</i>	We oppose the residential development of Chatham Docks. This site should be retained for commercial/industrial use. Understanding that the provision for 3,000 flats would need to be provided elsewhere within the Local Plan area. We support the residential development of brownfield or Previously Developed Land (PDL) sites within the Medway City Estate. These would need to score highly on the Sustainability Appraisal (SA) and not harm the environment or habitat sites. The demand for commercial/industrial space may be met with sites at Kingsnorth and Grain on brownfield land or Previously Developed Land (PDL). These would need to score highly on the Sustainability Appraisal (SA) and not harm the environment or habitat sites. There will also need to be available transport infrastructure capacity.
Category: Suburban Expansion	
Page 20. Paragraph 5.29 <i>“This category considers the areas for potential growth adjoining the existing urban areas to the south and east of Medway. These are largely located to the north and east of Rainham and in the Capstone and Hempstead area to the south. The existing suburban neighbourhoods are home to many of Medway’s residents, and key services and employment areas. The undeveloped land around the suburbs is valued as a contrast to the large urban conurbation, providing important green lungs within an otherwise dense urban area and includes the popular country parks at Capstone and Riverside. Historically these areas have been important for farming, such as the north Kent fruit belt, from which the county gets its recognition as the Garden of England. There are key landscape links to the estuary in the north and the Kent Downs to the south. Car ownership rates are higher in this part of Medway, and there are congestion hotspots on the highways network, particularly along the A2.”</i>	We agree the existing suburban neighbourhoods are home to many residents and particularly key services and employment areas. The sites being promoted within the Suburban Expansion category are also close to existing town centres, railway stations and the Strategic Road Network (SRN), such as the M2 motorway. The suburbs in this part of the Local Plan area do indeed benefit already from popular country parks at Capstone and Riverside. This isn’t currently the case with the Rural Development category area and the sites being promoted for development there. From a baseline position and in terms of access to existing country parks alone (significant green spaces), the sites within the Suburban Expansion category area should score more highly for selection than the sites within the Rural Development category area. The same could also be argued for access to existing services, employment areas, town centres, railway stations and the Strategic Road Network (SRN). Unfortunately, the suburbs have lost much of its historic farming economy and general association with the Kent fruit belt and being recognised as part of the Garden of England. However, this certainly isn’t the case for the Rural Development category area with its existing strong agricultural economy, particularly on the Hoo Peninsula. We agree the area of Capstone and East Rainham is situated next to the Kent Downs and wider Kent countryside. Metaphorically speaking, the Medway Council border with Kent County Council is not a hard international crossing and therefore residents from the Medway Towns within the suburbs can and do benefit from the greenspaces, landscapes and

	countryside that surrounds the Medway Council border. Although development of sites within the Capstone Valley and East of Rainham will reduce the landscape within the boundary of the urban area of Medway Council, suburban residents will still continue to access and benefit from the substantial and vast landscape immediate beyond Medway Council's border. The situation on the Hoo Peninsula is completely different as it has a more restricted landscape - the peninsula is physically and geographically bordered on three sides by the River Thames and River Medway. This isn't the case with the suburbs. We don't dispute that car ownership rates are high within the suburbs. Car ownership for the Local Plan area in general is higher than national and regional average. However, car ownership is highest within the Rural Development category area and this can be substantiated with the latest Census data.
Page 21 Paragraph 5.32 <i>"Much of the land around the north and east of Rainham is the best and most versatile farmland, although many fields are not in active agriculture use. The area to the south is within the setting of the Kent Downs Area of Outstanding Natural Beauty, and undeveloped land forms an important component of our green infrastructure networks. The area to the north lies close to the Medway Estuary, which is designated a Special Protection Area, Ramsar site and Site of Special Scientific Interest, recognising its international and national importance for wildlife."</i>	We agree with this statement. We are equally concerned with the sites being promoted for development in North Rainham as this development will be very close to the Medway Estuary and Marshes Special Protection Area (SPA), RAMSAR site and Site of Special Scientific Interest (SSSI). These are some of the same habitat sites we believe are threatened by the impacts of proposed development on the Hoo Peninsula, particularly around Chattenden, High Halstow and Hoo. Officers must recognise the sites being promoted for development within Capstone do not have the same environmental impact constraints as the sites being promoted for development in North Rainham and on the Hoo Peninsula. On this basis alone, new development allocations on greenfield sites should be weighted towards Capstone in the first instance. The environmental impact scoring using the Sustainability Appraisal (SA) should reflect this.
Page 21. Paragraph 5.33 <i>"The A2 is an important transport corridor, but experiences congestion and has been designated an Air Quality Management Area. There is a risk that major development in these suburban locations could generate further dependencies on car-based travel, adding to congestion and pollution, and undermining Medway's ambitions for sustainable development. Much of the potential development south of the M2 is anticipated to travel towards the M2 via junction 4 which may need to be improved to accommodate additional traffic."</i>	We agree with this statement. However, wherever development is allocated in the Local Plan area there will be transport impacts. Because of the scale of growth required to meet the housing need, these impacts will be significant and could be demonstrable - outweighing the benefits of the proposed development. The difference with the Suburban Expansion category area, compared to the Rural Development category area, is the suburban sites being promoted for development are closest to the Strategic Road Network (SRN), such as the M2 motorway, as well as existing mainline railway links and stations.

Page 21. Paragraph 5.34 <i>“Although potential sites could be developed in proximity to existing towns and neighbourhoods, there is not sufficient capacity in existing services, such as schools and health services, to cater for an increased population. New housing would need to make provision for expanded and new services. Similarly, schemes that focus on homes and not jobs and services could result in unsustainable development and increase people’s need to travel.”</i>	We agree with this statement. However, the exact same could also be said for the Rural Development category area and the sites being promoted around Chattenden, High Halstow and Hoo.
Page 21. Paragraph 5.35 <i>“Land in this area lies close to Medway’s boundary with neighbouring authorities, particularly Swale and Maidstone. Development in these locations would potentially have a cross-border impact. Development to the east of Rainham would erode the strategic gap between Rainham and Newington and add further to the congestion and pollution issues on the A2. Development to the south around the Capstone Valley would potentially adjoin the development of the proposed ‘Lidsing Garden Community’ in Maidstone. The landowner is promoting a cross-border masterplan. There are a number of potential impacts, including transport, infrastructure and the natural environment.”</i>	We partly agree and partly disagree with this statement. We agree there will be cross-border impacts of development within the suburbs and we agree there is a requirement for cross-border planning. We don’t consider cross-border working to be a constraint or significant obstacle to creating Sustainable Development. In terms of erosion of strategic gaps or green buffers between settlements, the exact same could also be said for the Rural Development category sites. For example, the land in-between Chattenden and Hoo is being promoted for development and this would completely erode the Chattenden Valley - which is a locally valued landscape.
Category: Rural Development	
Page 22. Paragraph 5.36 <i>“Although Medway is largely an urban authority by population, the majority of its land is rural. Much of the countryside is on the Hoo Peninsula to the north of the borough, as well as the Medway Valley to the south west. Rural Medway is markedly different in character to the urban towns and neighbourhoods. The villages in the Medway Valley sit within the setting of the Kent Downs and the river. The Hoo Peninsula sits between the Thames and Medway estuaries. Much of the periphery of the peninsula is designated as Special Protection Areas (SPAs) and Ramsar sites, recognising its international importance for nature, particularly migrating birds. There are further Sites of Special Scientific Interest (SSSI) across the peninsula, which are of national importance. The coastal marshes and mudflats and areas of woodland shape the distinctive character and feel of the peninsula. These landscapes are valued for their sense of place and remoteness, all the more special, given their proximity to urban Medway.”</i>	We agree with this statement. It’s correct to say the villages in the Medway Valley sit within the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB) designation. However, it’s important to highlight that this area and a large part of the Hoo Peninsula are geographically part of the North Downs. The Kent Downs AONB is a designation and the North Downs is a geographical/topographical area - partly designated as an AONB. The ridges of chalk hills that make up the North Downs extends through Cliffe and onto the Hoo Peninsula. There are a number of chalk and aggregate quarries around Cliffe and a number of healed ridges run through the spine of the Hoo Peninsula. These healed ridges are thought to be the Anglo-Saxon origin of the word ‘Hoo’. The Hoo Peninsula is surprisingly hilly to many visitors and the landscape becomes much flatter and more open as you head towards the Isle of Grain. Officers will be aware of our aspiration for the Hoo Peninsula to be designated as an Area of Outstanding Natural Beauty (AONB) and a natural extension to the Kent Downs AONB.
Page 22 and 23. Paragraph 5.37	We agree with this statement.

<i>“The peninsula includes areas of the best and most versatile land for agriculture, and there is a strong farming presence. However, the area is also characterised by wider industries, particularly the legacy of the energy sector at Grain and Kingsnorth. These two large brownfield sites form an important part of Medway’s employment land supply and offer unique opportunities for further jobs growth such as realising opportunities for green technology as the country moves to zero-carbon.”</i>	However, we disagree with the suggestion that the Hoo Peninsula is largely characterised by industry, particularly the energy sector at Grain and Kingsnorth. Both major power stations at Grian and Kingsnorth have been demolished in recent years. These structures, particularly the chimneys, were synonymous with the Hoo Peninsula. The industrial landscape of the Hoo Peninsula has reduced significantly over time and this has resulted in a softer and more aesthetic vista. Perceptions of the area have also changed dramatically over recently years. The Hoo Peninsula is no longer associated with heavy industry and is instead now strongly associated with wildlife and the natural world. That said, we recognise that the Hoo Peninsula is home to two large brownfield sites and there is now the opportunity for these sites to be developed in a softer, more biodiverse and more landscaped way. We don’t believe these brownfield sites detract from the natural qualities of the Hoo Peninsula.
Page 23. Paragraph 5.38 <i>“There are a number of villages on the peninsula, with the largest being Hoo St Werburgh. Hoo has a population of over 10,000 people and provides services, such as schools and sports facilities to the wider villages on the peninsula. However, many residents travel off the peninsula to reach workplaces, shops and other services. There are high levels of car ownership and public transport services are limited in a number of areas.”</i>	We agree with this statement. There are very high levels of private car ownership, as substantiated within the latest census data. Private car ownership on the Hoo Peninsula is higher than the national average and regional average. Public transport, particularly buses, is very poor and unattractive for local residents. Coach services, until recently, used to operate on the Hoo Peninsula - these services would transport commuters into London and back. Four Elms Hill is an Air Quality Management Area (AQMA) and suffers from severe congestion at peak times. The main route on and off the Hoo Peninsula is highly vulnerable and sensitive to congestion and gridlock.
Page 23. Paragraph 5.39 <i>“The vast majority of sites that have been put forward for potential development in rural Medway (outside of the Green Belt designation) are on the Hoo Peninsula. Most of the sites are promoted for housing led development, with the exception of the larger employment sites. It is noted that many of the sites promoted for development on the Hoo Peninsula are large scale, each potentially providing land for hundreds of homes.”</i>	We agree with this statement. However, although a number of sites being promoted for development on the Hoo Peninsula are large scale, the vast majority of sites being promoted and the vast majority of housing development capacity is indeed off the Hoo Peninsula in other parts of the Local Plan area.
Page 23. Paragraph 5.40 <i>“There is significant land for potential development for homes, jobs and services on the Hoo Peninsula. The Council has recognised this potential through its work on the Local Plan, and considering options for how Medway can grow in the future. The Council has</i>	Although there is a large amount of land being promoted for development on the Hoo Peninsula, this doesn’t automatically mean that this land in question, if developed, will constitute Sustainable Development. The Council has been attempting to create a new Local Plan, with significant development on the Hoo

<i>considered the potential for large scale growth on the peninsula through its work on the draft Hoo Development Framework which was published for consultation in 2022. The Housing Infrastructure Fund (HIF) programme sought to deliver improvements to transport and put measures in place to strengthen the local environment. These would provide certainty in planning for future development in the area, and in assessing sites across Medway in the context of constraints and possible mitigations in preparing the Local Plan."</i>	Peninsula at its heart, for some time. This focus on the Hoo Peninsula has resulted in two Local Plans being found 'Unsound' at Examination, and more recently, a draft Local Plan being tabled but later withdrawn before a Council meeting. A common theme throughout these episodes has been a lack of comprehensive evidence to support and justify a growth/development focus on the Hoo Peninsula. Particularly, the lack of evidence to discount other spatial strategy options in the Local Plan area. Officers have outlined within the Hoo Development Framework (HDF) document itself very clearly that this work does not constitute planning policy. As discussed previously, the Council does NOT currently have a preferred strategy or a list of preferred sites and the Local Plan work to date carries little to no weight in planning terms. This of course unhelpfully won't stop landowners and developers on the Hoo Peninsula attempting to attribute weight to the work the Council has produced to date - in order to try and justify their development sites.
Page 23. Paragraph 5.41 <i>"In the absence of the HIF funding programme, the opportunities and issues still remain key considerations in the preparation of the new Local Plan. Large scale development around Hoo St Werburgh and neighbouring villages could provide for planned growth, where new housing is supported by new and improved services and infrastructure. Such development could also help to meet the Council's ambitions for greener growth, with higher environmental standards in construction, communities better connected for walking and cycling, and within easy reach of local services."</i>	Officers will be fully aware of the clear link between the scale of growth being promoted by landowners/developers on the Hoo Peninsula and the critical requirement (this isn't optional) for significant infrastructure and environmental mitigation (even compensation) for this development to actually come forward and be built. The scale of growth being promoted on the Hoo Peninsula can't happen without significant infrastructure and environmental mitigation/compensation. These issues represent a critical constraint to growth in this area. Arguably, other parts of the Local Plan area do not share these same constraints.
Page 23. Paragraph 5.42 <i>"The peninsula also has a key role in Medway's economic development strategy, with major sites at Grain and Kingsnorth offering potential for new employment sectors and being regional hubs in energy and green technology industries, contributing to de-carbonisation of the economy. The area's environment also offers opportunities to develop green tourism, based on assets such as the estuaries and the spectacular shows of birdlife. Agriculture will continue to be an important land use for the peninsula."</i>	We agree with this statement. We generally support the development of the large-scale Previously Developed Land (PDL) sites at Grain and Kingsnorth, within their existing brownfield envelopes. We don't support these areas expanding onto 'fresh' greenfield sites. Officers will be fully aware of the current situation and conflict on this issue between Berkley Modular and Uniper at Kingsnorth. Development at Grain and Kingsnorth are still subject to significant transport infrastructure and environmental impact constraints. We believe it's simply not possible for there to be significant commercial/industrial development at Grain/Kingsnorth AND significant housing development on the Hoo Peninsula as well.

	We support the idea of increasing green tourism on the Hoo Peninsula in order to showcase our beautiful and fantastic wildlife. However, this does come with its own risks, including Recreational Disturbance (RD), and it will need to be handled very carefully.
Page 24. Paragraph 5.43 <i>“The Hoo Peninsula has significant potential for further development, as part of Medway’s wider growth in coming decades. This is shown in the extensive number of sites promoted for development on the peninsula, and the scale of potential sites. However, there are a number of specific considerations for development on the peninsula.”</i>	We accept a large number of sites are being promoted for development on the Hoo Peninsula by landowners/developers – this has been the case for a considerable amount of time. However, we believe the potential of many of these sites actually coming forward and being developed is too farfetched, in terms of achieving Sustainable Development and being approved (either by the Council, on Appeal or at Inquiry). The impacts of allowing development on the Hoo Peninsula would significantly and demonstrably outweigh the benefits, especially if alternative locations for the development currently exist.
Page 24. Paragraph 5.44 <i>“The area’s special and distinctive environment is a primary consideration. The Local Plan will set out a strategy, not just for development, but also for strengthening our green infrastructure networks and sites. Biodiversity, landscape, and water management are just some of the key matters in environmental planning. The Council will assess the potential impacts of possible development sites on different aspects of the natural environment, with specific attention to the designated areas, such as SSSIs and the SPAs.”</i>	We agree with this statement. We particularly welcome Officers ensuring the Hoo Peninsula’s environment, and designated habitat sites, are a primary consideration. This should be the primary consideration for the entire Local Plan area, particularly with regards to the selection of sites and the requirement to follow the Avoid, Mitigate and Compensate Hierarchy (AMCH). Applying the AMCH when selecting sites is not constrained to the boundaries of the Hoo Peninsula. The entire Local Plan area needs to be considered, particularly with regards to avoiding harm by allocating an alternative site.
Page 24. Paragraph 5.45 <i>“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.”</i>	We agree with this statement. However, infrastructure capacity is not a consideration. It is a critical requirement in order to achieve Sustainable Development, particularly with regards to any potential residential or commercial/industrial growth on the Hoo Peninsula. We agree that major transport schemes will need to be put in place, with significant increases in transport capacity delivered, before any promoted development is considered on the Hoo Peninsula. However, the costs of these infrastructure capacity improvements may not be viable due to little amount of Section 106 contributions raised from potential development. In other words, without significant Government financial intervention, large-scale growth on the Hoo Peninsula is not realistic or feasible in sustainable terms.
Page 24. Paragraph 5.46 <i>“Similarly wider investment is required in wider services, such as schools and health and leisure facilities, to support larger communities, as the</i>	We agree with this statement. There is a significant infrastructure requirement to increase capacity in transport and services locally. Plus, there is a significant environmental mitigation and compensation requirement to protect local

existing infrastructure reflects the area's rural character and villages. Large scale growth would need careful planning for phasing and design to provide for sustainable development."	habitat sites. Both of these in combination result in a critical constraint to promoted residential and commercial/industrial growth on the Hoo Peninsula as the area is not currently a sustainable location. We believe the simple reality of our local geography, being a peninsula restricted on three sides, makes it completely impossible for the scale of growth being promoted to become reality, without herculean financial intervention and changes. From a national perspective, the cost of doing this is not worth the growth (although significant and large-scale) being promoted locally.
Category: Greenbelt Release	
Page 25. Paragraph 5.47 <i>"There is a common confusion with the technical jargon used in Planning between Green Belt and greenfield land. Green Belt is a specific policy designation around major cities. Greenfield is used to refer to undeveloped land, like fields, in contrast to brownfield sites, which have previously been developed. National planning policy attaches great weight to Green Belt policy which places limits on development. Greenfield sites do not have the same level of protection in national planning policy."</i>	We agree with this statement. We understand the difference between greenbelt land and greenfield land. However, greenfield agricultural land, or undeveloped land, does have its economical, food security and environmental value. Greenfields can form part of a valued landscape, such as the Chattenden Valley between Chattenden and Hoo. Greenfield agricultural land also provides a buffer between settlements to stop coalescence.
Page 26. Paragraph 5.53 <i>"In addition to the strong policy presumption against development in the Green Belt, much of the land in Medway's part of the Green Belt is also part of the Kent Downs Area of Outstanding Natural Beauty (AONB). The AONB designation and its setting is also afforded significant weight in national planning policy to protect land from major development. The potential cross border proposal in the Medway Valley would have significant impacts on the AONB. The Council would be expected to evidence a case for development in such a location and how landscape impacts could be mitigated."</i>	We agree with this statement. Areas of Outstanding Natural Beauty (AONB) should be protected as a priority. We recognise that AONB status doesn't restrict any development, but it does, as highlighted, protect land from major development. We believe the Hoo Peninsula is worthy of AONB designation status and as an extension to the Kent Downs AONB. However, it should be noted that some brownfield or Previously Developed Land (PDL) exists within greenbelt and AONB designated areas. This has been highlighted nationally and it may be suitable to release certain sites within these areas. In other words, AONB status for the Hoo Peninsula wouldn't restrict development of brownfields/PDL at Grain and Kingsnorth.
Employment Sites	
Page 27. Paragraph 5.56 and 5.56. <i>"The main employment areas are currently spread across Medway, reflecting historic patterns and the geography of separate towns and villages. Businesses also orientate to sites that meet their needs for access, space, connectivity and services, and in some cases, proximity to linked businesses."</i> <i>"The plan is to consider the need for more employment floorspace for businesses. The Medway Employment Land Assessment, 2020 indicated a need for 62.3 hectares of employment land up to</i>	Two paragraphs are numbered 5.56. We agree with these statements. The need for 62.3 hectares of employment land up to 2037 could be accommodated within the existing Kingsnorth brownfield/PDL site envelope alone, without the need to expand onto 'fresh' greenfield agricultural land. There is more than sufficient Previously Developed Land (PD) available at Grain and Kingsnorth to meet this commercial/industrial need. This is of course subject to transport infrastructure capacity upgrades and environmental mitigation/compensation.

2037. The majority of the land would be needed for warehousing and distribution activities.”	
Page 27 and 28. Paragraph 5.57 “A number of sites are being considered through the Land Availability Assessment for employment allocations in the new Local Plan. These include the strategic sites at Grain and Kingsnorth on the Hoo Peninsula, with unique opportunities in specialist sectors, such as energy and green technology, and making use of wharfage facilities.”	We agree with this statement. However, as mentioned previously, we believe it’s simply not possible for there to be significant commercial/industrial development at Grain/Kingsnorth AND significant housing development on the Hoo Peninsula as well. Energy and green technology development has less impact on local transport capacity compared to warehousing and distribution. Energy related development is more favourable and the infrastructure to support this, such as electricity pylons and transformers, exist already.
Page 28. Paragraphs 5.60, 5.61 and 5.62 “Transport infrastructure is again a key consideration with employment land. Plans to expand business uses may be challenged by limited capacity on roads, and poor public transport connections. There are specific issues with the Strategic Road Network as highlighted above.” “In addition, there are impacts on local roads, particularly where businesses involve warehousing and distribution uses.” “The Council will need to carefully consider the impacts of employment land proposals to provide direction on the capacity of transport networks and the requirements for sustainable travel options.”	We agree with these statements. However again, infrastructure capacity is not a consideration. It is a critical requirement in order to achieve Sustainable Development, particularly with regards to any potential residential or commercial/industrial growth on the Hoo Peninsula. Warehousing and distribution uses will have more of an impact on local transport infrastructure capacity compared to energy and green technologies. We understand there are capacity issues with the electricity grid at Kingsnorth. This is currently restricting commercial/industrial growth without an increase in generation or importation on the site.
Next steps	
Page 29. Paragraph 6.2 “Following this consultation, the Council will collate all written comments received and analyse them to show the key issues raised and suggestions for the direction and content of the new Plan. The comments will be published on the Council’s website, with sensitive personal information removed. The Council will also publish how it has responded to the issues raised. The consultation comments will be submitted to the independent Local Plan Inspector, when the Council submits the Plan for examination next year.”	We welcome and agree with this statement. However, the Council’s ambition to submit a draft Local Plan for Independent Examination by the end of next year is far too optimistic. The Council has restarted the Local Plan process with a new Call for Sites and is consulting on a Regulation 18 consultation document that is very light on detail with no draft policies. There is also a lack of supporting evidence as this is still in production and will take time to process.
Page 29. Paragraph 6.3 “The Council will use the information collected through the consultation to prepare the next stage of its work on the Local Plan. It will review the vision and strategic objectives for the Plan in the light of the comments raised, and will draw up a strategy for Medway’s growth, based on the options set out in this document. Establishing a vision and strategic objectives will help to select sites for allocation, having identified the range of potential sites available	Following this consultation, the Council should draw up a number of spatial strategies and reasonable alternatives and score these against each other and the Sustainability Appraisal (SA). There will need to be another round of Regulation 18 consultation on these options before progressing to a Regulation 19 draft Local Plan with a preferred option. The Council is at risk of progressing to Regulation 19 too quickly and this may present challengeable grounds to the Local Plan at Independent Examination.

for development through the Land Availability Assessment, which will be integrated with the Sustainability Appraisal.”	
Page 29. Paragraph 6.4 <i>“The next stage will be the publication of a draft Plan, presenting the policies and site allocations that the Council intends to submit for examination, as its preferred strategy for managing Medway’s growth up to 2040.”</i>	As mentioned above, progression to Regulation 19 draft Local Plan may be too soon for the Council following this very early-stage Regulation 18 consultation document. The publication of a draft Local Plan by the end of 2024 is too optimistic. Officers should look at creating and appraising the following broad options for a Regulation 18 consultation: Option 1: Urban Regeneration and Suburban Growth - capacity for up to 20,831 houses. Option 2: Urban Regeneration and Rural Development - capacity for up to 25,887 houses. Option 3: Urban Regeneration and a mix of Suburban Growth and Rural Development - capacity for approximately up to 23,359 houses. These three broad options represent the only realistic spatial strategies and reasonable alternatives that can be appraised and scored against each other, particularly on environmental impacts. A preferred option should be then taken forward to the Regulation 19 draft Local Plan stage.