



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,
ME3 9LH

Saturday 24th February 2024

Richard Hicks (Chief Executive)
Medway Council
Gun Wharf
Dock Road
Chatham
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ME4 4TR

CC: Adam Bryan (Director of Place), Mark Breathwick (Assistant Director of Culture & Community), Paul Cowell (Head of Culture & Libraries), Dave Harris (Chief Planning Officer), Bob Diamond (Head of Sport, Leisure, Tourism and Heritage) and Medway Councillors.

Re: Hoo Peninsula Community Infrastructure Framework.

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 letter concerns the Hoo Peninsula Community Infrastructure Framework (HPCIF) announced yesterday.

We welcome the recent decision and intention, as requested by our recent representation, to conduct another Regulation 18 consultation, along with the supporting transport and ecological assessments, later this year. This consultation will provide more details and the evidence base to support a preferred spatial strategy for the Regulation 19 draft Local Plan. **We therefore question the Council's rationale for introducing and conducting this HPCIF work now, in advance of the next Regulation 18 stage of the Local Plan process.** We have also explained our many reasonable areas of concern about the HPCIF below.

The origins of the HPCIF, how it's funded and its links to the now withdrawn £170 Housing Infrastructure Fund (HIF) Project.

Homes England withdrew last year (2023) Medway Council's £170m HIF Project (known as Future Hoo) for a new railway, road capacity upgrades and environmental mitigation. This project was designed to enable up to 12,000 houses to be built on the Hoo Peninsula, predominantly around Chattenden, High Halstow and Hoo. This spatial strategy was being pursued as part of an also withdrawn emerging draft Local Plan, **without the completed comprehensive evidence and justification to support it.**

The Hoo Peninsula was recognised (and is still recognised) as not a sustainable location for this scale of growth and this is why the HIF Project was created, with an Expression of Interest (EOI) for the proposals submitted in September 2017. Some development in Hoo and the surrounding area has been permitted since 2017 on the assumption that the HIF Project would provide for the various transport and ecological mitigation deemed necessary for sustainable growth. **The Hoo Peninsula is a more unsustainable location today than it was back in 2017.**

The Council has hired London based consultancy firms Partnering Regeneration Development Ltd. (PRD), Augarde & Partners and Urban Silence to conduct the work to produce the HPCIF at a cost of £75,000 (with £22,401.50 already spent). This is being funded via Section 106 developer contributions from local development that has already been granted planning permission and is being built or has been built - including many consented and built-out schemes where the now withdrawn HIF Project was used as approval justification.

Rather concerningly, the Council lists the HPCIF in its Annual Infrastructure Funding Statement for 1st April 2022 to 31st March 2023 as **"PRD Future Hoo Community infrastructure"**. Therefore, the HPCIF **appears to be intrinsically linked** to the Council's now withdrawn housing development project on the Hoo Peninsula.

We question why the Council is seemingly continuing with work related to the withdrawn £170m HIF Project and why it continues to **exclusively focus on development-linked work on the Hoo Peninsula and not the Medway Towns and wider area as a whole?**

We also question why the Council decided to spend local Section 106 contributions and press ahead with this piece of work **without first consulting local Ward Councillors and Chairs of Parish Councils?**

This HPCIF appears to be **predetermination** of the Local Planning Authority's (LPA's) objective and evidenced-based Local Plan process, particularly with regards to development site allocations and the eventually chosen spatial strategy.

It is also important to highlight the scope of the HPCIF work has changed from originally concentrating on the village of Hoo to now all the villages on the Hoo Peninsula. Officers have confirmed the reason there is no Community Infrastructure Framework work proposed or being carried out for the Medway Towns (including Capstone Valley and Rainham) is because of funding constraints. **The HPCIF work should not be undertaken in isolation** and in advance of the next Regulation 18 Local Plan consultation and supporting evidence base.

The exclusion of democratically elected Ward Councillors/representatives of the Hoo Peninsula, as well as Parish Council representatives, from the "Hoo Peninsula Community Panel."

We believe it's **unacceptable** for Hoo Peninsula Ward Councillors representing Strood Rural Ward (Cliffe, Cooling, Cliffe Woods, Wainscott, Frindsbury and Upnor), Hoo & High Halstow Ward (Chattenden, High Halstow and Hoo) and All Saints Ward (Allhallows, Grain, Stoke and St. Mary Hoo) to be excluded from the so called "Hoo Peninsula Community Panel". The Council proposes a panel made up of fifty residents to represent all the communities and demographics of the Hoo Peninsula, but has not included or accommodated democratically elected Ward Councillors and at least a representative from each Parish Council on top of this figure (bringing the panel membership to 66).

We feel this is unreasonable and we question the justification for this **exclusion of local representatives**. It's also concerning that Officers haven't answered our very important question regarding whether the once completed HPCIF document will be published for general consultation - to receive the wider community's comments and possible adjustments or changes?

Conclusion.

Our current position of questioning the introduction of the HPCIF work ahead of the next Regulation 18 Local Plan consultation, and supporting evidence base, must not be misconstrued as not supporting infrastructure for our local community - this is clearly not the case.

The previous administration proposed infrastructure on the Hoo Peninsula, such as new green spaces and sports centres, but this would have been funded by unevidenced and unjustified large-scale housing development. In other words, and to date, there's always been a cost to the community in return for these infrastructure proposals and we are, understandably, still wary of any potential new infrastructure plans or proposals ahead of any allocations.

There has been a discrepancy in approach where, for example, the Splashes replacement sports centre in Rainham is being financed through borrowing, whereas the previous administration suggested the promised new sports centre for the Hoo Peninsula (following the closure of Deangate Ridge Golf Course in 2018) could only be financed by new housing development and Section 106 contributions.

Because the Hoo Peninsula has become **a more unsustainable location** in recent years, particularly with the loss of local green spaces, we have been campaigning for better facilities and services **for the existing community**. However, this community infrastructure should not be financially dependent on large-scale housing development proposals which will, overall, exacerbate existing conditions.

Thank you and yours faithfully,

George Crozer

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