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# Planning for Growth on the Hoo Peninsula Response Form

This response form has two parts to complete below.

## Data Protection

Personal information gathered on this form will only be used for planning policy purposes and will be held in accordance with the requirements of the Data Protection Act 2018. Your contact details will be **kept confidential** but your comments will form part of the public record of the consultation and published on the council's website. Please address any questions or requests regarding our data processing practices to [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk).

Details about how your information will be held and used are found on the link below:  
[https://www.medway.gov.uk/info/200133/planning/714/planning\\_service\\_privacy\\_statement](https://www.medway.gov.uk/info/200133/planning/714/planning_service_privacy_statement)

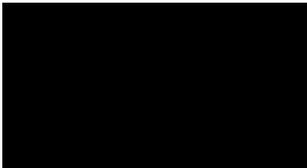
## Part 1 – Your Details

Name: Mr P Buckley

Name of organisation (if applicable):

CPRE Kent

Address:



Email:



Phone:



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## Part 2 – Your Response

- This public consultation proposes a vision for growth on the Hoo Peninsula.
- The vision should help to make it clear what we want to achieve. It should be clear, realistic and locally distinctive.
- The vision is important because it will guide the objectives, policies and design principles.

The proposed vision is:

*By 2037, Hoo St Werburgh will be a thriving rural town, sensitively integrated into the extraordinary landscape of the Hoo Peninsula. A valued place providing homes, jobs and services for vibrant communities. A small town with an attractive choice of travel connections. A place built for the future, and respecting the past.*

**1. Do you get a clear sense of what the Hoo Peninsula will be like by 2037?**

Yes

No

Comments:

See response at 7 below

**2. Does the vision describe the Hoo Peninsula as opposed to anywhere?**

Yes

No

Comments:

See response at 7 below

**3. Does the vision reflect your priorities?**

Yes

No

Comments:

See response at 7 below

**4. Is it concise and easy to understand?**

Yes

No

Comments:

See response at 7 below

**5. How can we measure success of achieving the vision?**

Comments:

See response at 7 below

**6. Can you set out a better vision for growth on the Hoo Peninsula? Please tell us:**

See response at 7 below

**7. Please use the space below to make any other comments on the consultation document:**

The proposals need to be grounded in hard evidence which is not available at the present. Without this it is not possible to comment on the proposal.

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Evidence will be necessary on matters such as:

#### Viability of the project.

There is no information on the cost of the suggested new roads and rail link, as well as open space etc. It is therefore not possible to know if the scale of the proposed development will be able to fund the necessary infrastructure.

#### Ability to deliver the road and rail infrastructure by 2024.

The brochure states that:

*'Hoo Peninsula and extended employment areas depend on strengthened connections and significant upgrades to transport. This was set out in the council's successful Housing and Infrastructure Fund bid which identified highway improvements to the existing A228 and A289, a new road and the reinstatement of rail passenger services. The improvements will be in place by 2024.'*

The new road and rail infrastructure will require orders under the Highways Act, and Transport and Works Act 1992.

Given that it is now 2020 it is difficult to know if these orders can be obtained and works undertaken in the short time period to 2024.

#### Housing Trajectory

There is no evidence that the 12,000 additional homes could be built within a 20-year period. 20,000 homes over a 20-year period implies a build out rate of 600 homes a year. This is the same as achieved over the past 5-years across the whole Council area. By comparison it has taken the Ebbsfleet Development Corporation 4 years to achieve 600 dwellings per annum. That is with the benefit of the Ebbsfleet HS1 station, proximity to A2 and three development areas.

The latest Office for National Statistics sub-regional population projection for Medway (2018-based released on 24 March 2020) indicate a significant fall in projected population relative to the 2014-based projection. This is likely to mean that far fewer homes will need to be provided and could call into question the need for this new community.

#### Ability to create a sustainable community

With regard to sustainable transport the PRINCIPLE 2: ACCESS AND MOVEMENT states 'The enhanced bus services have the potential to reduce over 7 out of 10 commuting trips currently by car to 5 out of 10 in the future.'

The UKFIRES report Absolut Zero (Delivering the UK's climate change commitment with incremental changes to today's technologies) published in November 2019 sets out that for the UK to achieve zero carbon emissions by 2050 road use will need to be at 60% of 2020 levels - through reducing distance travelled or reducing vehicle weight; and that total energy required to transport food will need to be reduced to 60%. <https://ukfires.org/absolute-zero/>

The number of commuting trips will have to be reduced to 4 out of 10 not 5 out of 10 set out in the consultation document.

Maidstone Borough Council Local Plan Review Scoping Themes & Issues Consultation July 2019 at page 52 sets out that "Research has shown that travel habits develop very quickly in new developments and once people have chosen their travel mode, they tend to stick to it."

The bus image on page 10 of the consultation document entitled 'more efficient and better connected bus services' is of a Fastrack A bus at the Bridge Community, Dartford. The Fastrack route was built before development commenced and a regular walk on service with subsidised fares for residents provided to encourage residents to use public transport.

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The consultation document does not provide any evidence that the scale of development will support a regular walk on bus service or that it will be available early on in the development to reduce car dependency.

There is no evidence that a regular train service is deliverable. We understand that the North Kent line has no additional peak time capacity.

Significant improvements to public transport will be required to enable new residents to travel to work, school, medical care etc.

With regard to walking and cycling routes the Framework Plan does not show any links within or beyond the new settlement. It is therefore not possible to know whether residents will be able to safely walk or cycle to work or school beyond the boundaries of the new settlement.

### Flood Risk

The proposed new settlement lies on the banks of the Medway estuary. It would appear that the new development will not be located in areas of flood risk. The Planning Practice Guidance sets out that residential development should be considered for a minimum of 100 years unless there is a specific justification for considering a shorter period – for example; the time in which flood risk or coastal change is anticipated to impact on it (Paragraph: 026 Reference ID: 7-026-20140306).

The Council's Local Flood Risk mapping undertaken by Capita Symonds/URS and published in 2013 at Figure 3.1 shows that there were 17 local flood incidents in the existing village of Hoo St Werburgh, and Figure 3.4 shows that land to the north east of the village and along the railway line were at high and very high risk of groundwater flooding.

Scientists consider that estimates of global sea level rise could rise far more than predicted. The National Academy of Sciences of the USA June 2019 research article states 'We find that a global total SLR exceeding 2m by 2100 lies within the 90% uncertainty bounds for a high emission scenario. This is more than twice the upper value put forward by the Intergovernmental Panel on Climate Change in the Fifth Assessment Report.'

This year's autumn and winter weather resulted in severe flooding in many parts of the country.

Scientific predictions and this year's winter flooding suggest that a flood risk assessment will be required to evidence that the new community will not be at risk from tidal, fluvial or surface flooding. consideration will need to be given to the Environment Agency flood risk maps. It will be important that development is not located in areas that are likely to be at risk of flooding in the future or result in flood risk elsewhere.

### Climate Change

On 12 June 2019 the Prime Minister announced that the UK will eradicate its net contribution to climate change by 2050. A statutory instrument was laid in Parliament which amended the net UK carbon account target from 80% to 100%<sup>1</sup>.

The new community will need to be designed to help the country meet this target.

### Air Quality

There is no evidence how improvements to the local road network will contribute to the reduction of queuing on Four Elms Hill and that this will address air quality issues related to the Air Quality Management Area given that 12,000 new homes could well increase traffic on the AQMA.

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<sup>1</sup> The Climate Change Act 2008 (2050 Target Amendment) Order 2019: 2.—(1) Section 1 of the Climate Change Act 2008

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### Social integration

At 2011 the Peninsula Ward within which Hoo St Werburgh is located had 6,100 households. The consultation document proposes 12,000 new dwellings over a 20-year period. This will treble the number of households on the peninsula. There is no indication how social integration will be achieved.