

High Halstow Parish Council

50 Pepys Way • Strood • Rochester • Kent • ME2 3LL

Tel: 01634 710086 • e-mail: clerk@highhalstow-pc.gov.uk

Website : www.highhalstow-pc.gov.uk



Rt Hon Kelly Tolhurst M.P.

Bellerophon House

Doust Way

Rochester

Kent

ME1 1FG

20/06/2020

Dear Kelly Tolhurst,

Encouraged by your recent letter in response to our colleague Councillor Linda Atkinson, I have been asked to write to you on behalf of the High Halstow Parish Council and its Neighbourhood Forum, to seek your assistance in relation to Medway Council's approach to development on the Hoo Peninsula and, in particular, their refusal to disclose to us or to discuss with us the details of the proposals for transport infrastructure on the Peninsula. We write to you as our local MP, but with the pride of knowing that you are also Minister for Transport in the Government.

The High Halstow Neighbourhood Forum is currently preparing a Neighbourhood Plan for the Parish of High Halstow under the provisions of the Localism Act 2011. This is likely to include identifying substantial areas of land for new housing. As you may be aware, the most recent draft of the emerging Medway Local Plan seeks to allocate land for about 12,000 new homes on greenfield land on the Hoo Peninsula, with about 800 new homes proposed for High Halstow, more than doubling the population within the plan period and in addition to substantial development already permitted.

The Peninsula has only one serious road access; the A228 Peninsula Way. Serious congestion occurs, particularly at Four Elms junction and roundabout in both the morning and evening peak hours and the Four Elms area suffers from serious air quality problems as a result. When the A228 is closed, as happens regularly, by a serious accident or other obstruction, the Peninsula is effectively blocked off from the outside world. High Halstow itself is served by narrow rural roads with passing places and no facilities for pedestrians or cyclists. High Halstow is poorly served by public transport. Development in the villages of High Halstow and Hoo in recent years has been opportunist, taking the form of individual applications with no overall masterplan or framework for development. The result is piecemeal planning with poor quality development. In a recent answer, planning and regeneration officers were unable to identify a single example of good design on the Peninsula, despite the rash of permissions in recent years. A large part of the problem is the absence of an up to date Local Plan, and no masterplan or design guide. The Regulation 19 draft Local Plan is continuously delayed and is entirely contingent on a Housing Infrastructure Fund grant of £170 million principally to provide new or improved roads and other transport links including a rail link to Gravesend and the Medway towns with onward connections to London. However, the prediction is that the new rail link will provide a modal shift from use of the car to rail of only 8%. The Parish Council are well aware of the need for new housing in Medway and for improvement to transport infrastructure. We are also aware that this must be balanced with need to protect and enhance the exceptional biodiversity, heritage and landscape resources that the Peninsula contains.

High Halstow Parish Council

50 Pepys Way • Strood • Rochester • Kent • ME2 3LL

Tel: 01634 710086 • e-mail: clerk@highhalstow-pc.gov.uk

Website : www.highhalstow-pc.gov.uk



We recognise that it is a central plank of Government Policy to include people and communities in decisions about their future, rather than to exclude them as the planning process has tended to do in the past. The Localism Act was passed by Parliament with that express objective in mind and it is reflected in the National Planning Policy Framework.

With this background in mind, the Parish Council and Neighbourhood Forum had hoped to be able to participate fully in the preparation and planning of proposals for development and transport infrastructure on the Hoo Peninsula, together with and along side its neighbouring Parish of Hoo St Werburgh, which bears the brunt of the Medway housing proposals in a proposed new "Rural Town".

To inform our participation in the process, we both had sought information from Medway Council, and, to a lesser extent, Homes England, about the specific proposals and the environmental impacts of those proposals in the HIF bid that would most affect our communities.

Instead of providing information to assist our involvement, we have been dismayed to be met with a wall of what we can only describe as direct obstruction and hostility from Medway Council, together with the publication of a document called "Planning for Growth on the Hoo Peninsula" which is most remarkable for its failure to provide any information of substance about what the Council is proposing.

In particular Medway Council have directly refused to answer our questions about the details of the HIF funded infrastructure and their environmental impacts, claiming, as an exemption, that to do so would affect their ability to make decisions. It is their clear and stated intention to ensure that the details of the transport infrastructure proposals and their environmental effects are not disclosed to us until after the HIF agreement with Homes England is signed, presumably to ensure that we are not put in a position to be able to question any of the proposals subsequently. Not only is such behaviour contrary to the objectives behind Localism and the legislation that Parliament and the Government has put in place to secure local community involvement in the planning process, but it is also directly frustrating the Parish Council and the Neighbourhood Forum in preparing our Neighbourhood Plan. We have been astonished to find the leader of the Council, Councillor Jarrett, describing the very limited responses we have had from the Council as "clear and continued engagement with the local community". He has had no engagement with the Parish Council and the officers' engagement has been limited, slow and largely unhelpful, being mainly directed to ensuring that we are not informed about details of the HIF proposals and their impacts.

High Halstow Parish Council

50 Pepys Way • Strood • Rochester • Kent • ME2 3LL

Tel: 01634 710086 • e-mail: clerk@highhalstow-pc.gov.uk

Website : www.highhalstow-pc.gov.uk



Of course, the statutory procedures that will accompany the Local Plan will allow for the statutory public consultation and participation in that exercise, in due course, but all the indications are that Medway Council does not intend to open up the content of the HIF programme to public discussion at any point prior to its final agreement with Homes England. The content of the HIF programme will therefore dictate and severely limit the options available at the Regulation 19 stage of the Local Plan. The HIF programme for Hoo has been drawn up to provide the transport infrastructure that would support a Regulation 19 plan which has yet to be published and whose environmental impacts have not yet been assessed. Yet it will inevitably pre-determine and severely limit the scope of any modifications that the Inspector will be able to make in order to ensure the Plan is "sound". The proposals for the Peninsula are to be largely fixed by the HIF agreement and we, and the Inspector, will be faced with a stark choice between going along with the HIF proposals (whatever they turn out to be) or having no Local Plan at all. The results of years of failure to deliver a Local Plan have already disfigured the Hoo Peninsula with inappropriate and poor quality development unsupported by essential adequate infrastructure in terms of education, medical facilities and the availability of local and accessible jobs, services and facilities.

We have suggested that this would best be achieved by the provision of a detailed masterplan incorporated into the statutory process as an Area Action Plan for the Hoo Peninsula, so that we can see exactly what is proposed and how it will affect our local communities. That suggestion has been met only with silence from Medway Council.

As things stand, the behaviour of Medway Council, who continue to treat the inhabitants of the Peninsula as some kind of backward indigenous colony incapable of participating seriously in the planning of our own future, and the Peninsula as a derelict wasteland, crying out for new development, is raising fear and disillusionment in the democratic process.

We therefore respectfully request that you intervene to assist us by ensuring that the HIF agreement between Medway Council and Homes England is not signed until the Parish Council and the local communities most affected by the proposals are consulted fully on the details of the HIF Infrastructure programme and its environmental effects have been assessed and published.

Yours sincerely

George Crozer

High Halstow Parish Council

PS. The Neighbourhood Forums hold regular combined virtual meetings. I have been asked to invite you to join us, even if only for a few minutes, to discuss these issues.

George