

DICKENS' COUNTRY PROTECTION SOCIETY

REPRESENTATION IN RESPONSE TO THE CONSULTATION BY MEDWAY COUNCIL UNDER REGULATION 18 OF THE TOWN AND COUNTY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012.

General Background

The Society's primary interest is the preservation of the countryside. The Hoo Peninsula was identified in the former Kent Structure Plan as an Area of Special Significance for Agriculture and the area's importance for agriculture was also recognised in the original Medway Plan. The basis of land use planning is to manage an important asset. In order to do this the area is surveyed and the significant assets are identified and before land is allocated for development, the capacity of the available infrastructure and the need for any new infrastructure is assessed. Before sites are finally identified for development, the impact of that development needs to be assessed and any necessary adjustments need to be made.

The Society recognises that the Regulation 18 process is intended to give an opportunity to those with an interest in land to put forward land for development. The Society's primary objective is the preservation of the countryside. The Society therefore does not propose to comment on any of the sites put forward in the urban area.

Housing Land

The Society is concerned that the need for land for housing in the authority's area may have been over stated and this should be checked independently. There is a tendency towards exponential growth. The more that is provided, the more is expected, but the resource is progressively depleted.

The Society would refer to the map entitled 'Rural Development' showing land put forward for development on the Hoo Peninsula. In the interest of proper planning, the Society would compare this with the former Ministry of Agriculture - Provisional - Agricultural Land Classification Map of England and Wales - Sheet 127 [scale 1 inch to 1 mile]. The Society would draw attention to the fact that of the 24 sites identified, only 5 are not indicated as Grade 1 agricultural land.

Agricultural Land

The Society recognises Agricultural Land Classification Maps are provisional and qualified stating that specific sites should be re-surveyed. The Society is concerned, however, that when sites are re-surveyed there appears to be one outcome. Of the ten major planning applications lodged in Medway between 2016 and 2023 where agricultural land was proposed for development, an agricultural assessment was carried out. In five of these cases the land was indicated on the Agricultural Land Classification Map as Grade 1 and in all five cases the result of the survey was to significantly downgrade the land. In only one of the eight cases did the survey findings coincide with map grading and that was when the grade was Grade 3. In the other two cases the land was indicated on the map as Grade 2 and was downgraded. Three different consultants produced the survey reports. The common feature was that the surveys were all commissioned by the respective developers.

The site surveys have evaluated the land in absolute terms against the ministry criteria. Even if all the survey reports were objective, it remains the case that in comparative terms the Ministry's classification is likely to remain valid. If the sites identified on the rural development map are to be considered, there is a need for an objective assessment of their agricultural land quality. In the interest of the economy and food security, development should not take place on the nation's best agricultural land. Only 2.8% of the agricultural land in England and Wales is categorised as Grade 1 on the Ministry's maps.

Infrastructure

The level of infrastructure needed to support the level of development being envisaged is alarming in terms of water requirement, sewage disposal, medical and other services. The transport infrastructure is not adequate. The Four Elms junction, in particular, in its present configuration cannot support more development on the Hoo Peninsula.

because of the traffic it will generate. The minimum requirement is for a grade separated junction. Failure to provide this will have serious consequences on the local economy because of the congestion that will be generated. It has not escaped the Society's notice that monies promised by central government have been withdrawn and this must have an impact on the authority's ability to support development.

General

The Society is concerned to ensure that individual settlements are not allowed to coalesce and that plans provide for villages to maintain their separate identity and urbanisation is kept to a minimum. There is currently a risk that Chattenden and Hoo St Werburgh will be allowed to merge.

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