# Planning for Growth on the Hoo Peninsula Response Form

This response form has two parts to complete below.

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Phone:

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# Part 1 – Your Details Name: Tim Collard Name of organisation (if applicable): Avison Young on behalf of Homes England Address: Email:

## 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 Penin Yes ✓	sula No		<u> </u>
	Comments: Homes England considers that the brochure is development anticipated, but this document is hi Peninsula development will come forward and be local plan.	gh le	٩V	el and details of how (and when) the Hoo
2.	Does the vision describe the Hoo Peninsula as $_{\mbox{\scriptsize Yes}}$	<b>oppo</b> No		-
	Comments: The vision is specific to the Peninsula particularly rural town is sensitively integrated into the "extraoryear period to 2037.			
3.	Does the vision reflect your priorities?			_
	Yes ✓	No		
	Comments: Homes England are broadly supportive of the vensuring the vision becomes a reality in enable Barracks. Homes England has provided some aspiration for land within its ownership in the Hoo on Homes England's proposals for Lodge Hill Cam	ing t speci Penir	h ifi ns	e delivery of c.500 homes at Chattenden c comments to outline Home's England's sula (see the response to Q7). This picks up
4.	Is it concise and easy to understand?			
	Yes ✓	No		
	Comments: The vision provides the overarching objective for care required, but Homes England would agree tha understand. However, the document as a whole is consultation, it might become and how detailed it refer that is the intention, then MC should be making the	t ove not c night	ra cle	all the messages in the brochure are easy to ear what its purpose is or what, following this et. For example, is this to become an SPD?

### Comments:

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

Over the 17 year period to 2037 it will be important to monitor the delivery of housing, infrastructure

and facilities. Homes England suggest that a specific Hoo Peninsula growth section could be created for Medway's annual monitoring report, to track progress against key milestones.

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

Homes England suggest adding "whilst utilising previously developed land" at the end of the above vision statement.

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

Homes England provide specific comments on the Vision document in the table overleaf. This reflects Homes England's proposed development and objectives for its land ownership parcels on the Hoo Peninsula. Overall the comments indicate the importance of Medway Council:

- outlining the pressing housing need issues and the need for growth around Hoo;
- providing clarity on what this document might become;
- being clear about how the settlement will function as whole;
- not being overly prescriptive at this stage but discusses critical success factors;
- indicating that development is expected to happen on Chattenden Barracks and Lodge Hill Camp;
- removing the reference to the Neighbourhood Centre at Chattenden Barracks and;
- being clear that the alignment of the proposed new relief road is yet to be fixed.

### Ref:

Page	Homes England Comment and Ref
Number	
1	1.0 Cover Page
	1.1 No comments.
2	2.0 A New Vision for Hoo St Werburgh (Page 1)
	2.1 We would suggest adding "enhanced" to "Principle 2 – Enhanced Access and movement".
	2.2 The messaging 'Where People have access to the services and facilities close by and don't need to drive' seems to be slightly at odds to the need to create significant new road infrastructure on the Hoo Peninsula.
3	3.0 A New Vision for Hoo St Werburgh (Page 2)
	3.1 The high level plan on Page 3 does not indicate any proposed development at Lodge Hill Camp which is previously developed (brownfield land). The document must show potential development here and, like the photographs, include a title i.e. "indicative masterplan showing broad areas for development of the Hoo Rural Town". This plan should not be taken to identifying the only development in this area as there could be other locations like Lodge Hill Camp that is redeveloped in the plan period to 2037 and such development opportunities should not get overlooked.
	3.2 No key to illustrative masterplan, it would be helpful if this detail is provided alongside future plans.
4	4.0 A New Vision for Hoo St Werburgh (Page 4)
	Local Plan Context
	4.1 The introductory sections should better tell the story about how Medway Council has reached this point, the technical work that has been done, the liaison with landowners, the issues that have been explored, the optioneering etc. This could be more compelling by discussing housing need, the fact that Housing need has to be met in full wherever possible and outlining what the National Planning Policy Framework says about how and where to deliver growth and the need to achieve sustainable development;
	4.2 Some detail on the specific housing numbers identified for the Hoo Peninsula and reference to the variety and quantum of non-housing development may have been helpful here – the commentary is fairly broad.
	4.3 In relation to Local Plan Context, it may also be worth referencing the stages the Council has been through in relation to Regulation 18 Plan

Consultation, wider liaison with stakeholders/ developers and landowners. 4.4 Suggestion that 'Biodiversity' as well as 'wildlife' is acknowledged as an important consideration. The Housing Infrastructure Fund (HIF) 4.5 This section needs more of an introduction in where Medway Council explains why it has been sought and more information on what it is intended to facilitate (i.e. housing growth). Government has not just given £170m for infrastructure, it has given £170m for infrastructure that is needed to unlock a significant quantum of new homes – it is felt that this this could be drawn out in a little more detail. 4.6 More details are required as to the timetable for delivery of HIF infrastructure and how this links in with housing and neighbourhoods being phased and that are planned to come forward in the new rural town. 5 5.0 A Vision for Hoo St Werburgh 5.1 The key matter in relation to SEMS is that Medway Council is considering options for SEMS in the light of the proximity of nationally and internationally significant habitats and populations of protected species, these include nightingale, breeding waders, bats and invertebrates, and a final scheme will be designed in due course based on the need to achieve improved connectivity between core sites for instance Chattenden Woods and Lodge Hill SSSI, Northwood Hill SSSI and Cliffe Pools. 5.2 Homes England would wish to see emerging plans for SEMS providing improved habitat connectivity between core sites. 5.3 Suggest inclusion "Opportunities to create new wetlands closer to the River Medway will also be explored in addition to creation of potential grassland and scrub mosaic habitat in targeted locations." 6 6.0 Opportunities and Constraints Constraints 6.1 First para – It would be helpful to have some clarity on the traffic and air quality issues that are referenced i.e. is this point solely related to the 4 Elms Roundabout and specific AQMAs? 6.2 It would be helpful to have some reference to the levels of highways movements that will result from the c.12,000 homes which underpins the need for transport related infrastructure;

- 6.3 The plan does not fully illustrate the SSSI boundary which is a significant flaw this could be seem as misrepresenting the scale, extent of the SSSI, whilst indicative it should be noted that there are areas of non-SSSI brownfield land with retained buildings within the area shown, such as Lodge Hill Camp;
- 6.4 Coupled to the above point, the fourth paragraph states: "Lodge Hill north of Peninsula way is closed to the public, limiting access to the nearby countryside". This is misleading alongside the image, as certain parts in green are accessible (i.e. the Lodge Hill recreation ground) and it is still possible to travel along Chattenden Lane to through this impermeable barrier outside of the Lodge Hill site. Limitations / restrictions need to be acknowledged (as do the benefits of limiting access) but the document could talk about the need to explore how appropriate and sensitive access to the green space is enhanced. It should also be made clear that Lodge Hill is a privately owned site and subsequently the commentary is misleading in that it suggests that it should be facilitating access (in its current condition) to land beyond it.
- 6.5 It is not clear what is meant on the plan annotation which references 'Sensitive Development Area' which seem to point at both the SSSI and brownfield land perhaps it would be better referenced as 'sensitive boundaries / interfaces. The annotation misleads the reader in terms of development potential of land that is appropriate to development.
- 6.6 The plan does not annotate the areas coloured 'purple'.
- 6.7 It would be useful if the commentary explained what the 'major road barriers' are that are annotated on the plan.
- 6.8 It would be helpful to understand the absence of Deangate Ridge which not annotated on the plan?
- 6.9 Why is there no reference to the SPA / Ramsar notifications in this section? It is considered that the full extent of environmental constraints is not recognised here.

### 7 **7.0 Opportunities**

- 7.1 Homes England acknowledges the proposed 'indicative new road' which is indicated as running through their landholding. This exact alignment of this road will be subject to discussions with Homes England (as landowner).
- 7.2 More information could have been provided on the proposed 'enhanced bus services'.

7.3 The opportunity to 're-use previously developed land' should also be identified specifically with reference to the Lodge Hill and Chattenden Barracks parcels. Lodge Hill Camp is not clearly identified at all which does not reflect the communications held on this parcel with Medway Council (to date). 7.4 "Key viewpoints" are not identified on the map / in the document, so it would be helpful if specific viewpoints that Medway Council wish to protect could be identified. 7.5 The SSSI network should also be seen as an "opportunity" as the SSSIs and the vicinity of these sites should be identified as areas to potentially enhance and improve habitat connectivity – consider these are being identified/addressed incorrectly; 7.6 'Indicative Neighbourhood Centres' have been represented on the 'opportunities plan' but with no detail as to the reason for the locations shown nor what facilities these Neighbourhood Centres could provide. 7.7 There is no recognition of the potential green connections between the SSSI's in Hoo or between potential significant green spaces. 7.8 Deangate Ridge has been omitted from this plan as a potential greenspace/country park contribution to the overall greenspace strategy. 7.9 In that a new road is shown in close proximity to an indicative neighbourhood centre at Chattenden, it would have been helpful to have had some clarity as to how the interrelationship between both features would work. 8 8.0 Design Principles and Development Frameworks 8.1 Homes England very much envisages an 'environmental / landscape-led' development approach as opposed to just a 'landscape-led' development approach. 9 9.0 Principles 1: A Landscape-Led Development 9.1 It would have been helpful for the 'Green Corridors' Plan to have shown the specific locations of all the SSSI in the vicinity as well as the broad locations of the SPA / RAMSAR. 9.2 Providing better public access should be coupled with current limitations to public access particularly with respect of the Chattenden Woods and

- Lodge Hill SSSI which has limitations for public access. Furthermore indicating 'green corridors' and "bringing nature closer to people" may be misleading as whilst it is a green corridor in ecological terms it should not necessarily represent a public access route particularly around the SSSI particularly in relation to the north south corridor shown between Chattenden and Hoo St Werburgh. The document and future consultation documents need to acknowledge these limitations and possibly even reflect on the benefits of these for ecology.
- 9.3 Agree with the depiction of an indicative Green Corridor and Landscape buffer however, the indicated Relief Road would sever this. Careful consideration should be giving to pedestrian and cycle connectivity across the new relief road and the existing Peninsula Way / Four Elms to ensure a cohesive Rural Town and how the parcels of land can link to the proposed country park.
- 9.4 We note that this plan and several others in the document are 'high level' to give an indication of the issues. There are therefore likely to be differences when looking at specific details, such as the Green Corridors that are identified (i.e. the actual developable areas may not accurately reflect developers proposed developable boundaries)
- 9.5 Final bullet point: 9 Homes England suggest that strategic gaps are discussed indicatively. Definitive boundaries will only be capable of being drawn when detailed masterplans are produced, i.e. with respect of a gap between Chattenden and Hoo St Werburgh.
- 9.6 We also query as to how a strategic gap will be maintained between Chattenden and Strood with a proposed relief road running through it?
- 9.7 There is potential for proposed development in close proximity to the Chattenden Woods and Lodge Hill SSSI to be ecology-led, and perhaps this should be noted as a priority for Hoo.
- 9.8 Suggestion that Country Parks should be referenced here as one is shown in the Green Corridor's plan, and that they can serve more than one function, providing recreation, semi-natural landscapes and habitats, as well as protecting more sensitive areas from use.

### 10 **10.0 Principles 2: Access and Movement**

- 10.1 Whilst Homes England supports the broad intentions to increase the choice of alternative modes of travel for the local community, the tone of the commentary is misleading in that the fact that a relief road is being proposed must be underpinned by the acknowledgement that car travel will be predominant as a mode of travel onto and off of the Hoo Peninsula.
- 10.2 Homes England is broadly supportive of a bus connection through, or near to, the Chattenden Barracks site promoting sustainable connectivity but little information is provided to the proposed bus routings.
- 10.3 Visual representation of the relief road, bus routes and walking distances referenced within the text would be helpful to understanding this plan.

	10.4 The brochure makes reference to a new Relief Road. It would have been helpful for the document to draw out more information around the function of this road and how the creation of a new route links to the other access improvements as part of a wider transport solution (as well as other options considered).
11	11.0 Principles 3: Vibrant and Sustainable Neighbourhoods
	11.1 Homes England are supportive of the aspirations set out for a Hoo Peninsula which will be a vibrant and sustainable place for those to live, work and socialise locally.
	11.2 Homes England supports the aspiration for walkable neighbourhoods clustered around the existing villages but clarification is required as to how these walkable networks will integrate within the large scale transport related infrastructure being proposed amongst the village locations.
	11.3 It is noted that there is very little information in the document about what Hoo currently has, what it needs to thrive as a sustainable settlement, and where facilities need to be bolstered to create a settlement with coherence and a heart (rather than just a collection of neighbourhoods).
	11.4 Homes England note that opportunities for each neighbourhood to be: "in close reach of a community hub, offering opportunities for employment, shopping and leisure" will vary in terms of scale and quantum between each area or neighbourhood shown and where facilities need to be bolstered to create a coherent settlement. Homes England therefore queries exactly how these neighbourhood 'hub' locations have been identified and what such a hub would provide.
	11.5 Any community hub (or Neighbourhood Centre) in Chattenden on Homes England land would only be provided on a limited basis and even then is subject to commercial and viability assessment.
12	12.0 Principles 4: Attractive and Tailored Built Form
	12.1 The ability to utilise and transform previously developed land, particularly around Chattenden Barracks and to effectively use such land should link into this principle.
	12.2 In response to commentary on the 2-3 storey guide for homes across the Peninsula, the policy should build-in some flexibility for taller buildings around the rail station and in and around the new neighbourhood centres.
	12.3 Homes England very much supports Medway Councils objective in that a wide mix of housing types is provided that will meet the needs of different sectors of the community.

Ref:

- 12.4 The brochure commentates that Hoo's existing Rural Character will be preserved by thoughtful density distribution, building height control and design Homes England feels that this could be even stronger with perhaps reference to a design guide (Building for Life 12 etc).
- 12.5 Homes are supportive of the proposed provision of Custom and self-build housing opportunities.

### 13.0 Village Living in Chattenden

- 13.1 With reference to the 'indicative' Local Neighbourhood Centre in Chattenden: Homes England would have liked to have seen a level of detail around the decision making for a Neighbourhood Centre in this location and what such a centre constitutes or means in concept masterplanning terms.
- 13.2 Homes England would be keen to understand where discussions regarding Neighbourhood Centres are to be taken next? Presumably, discussions will be held with landowners around the commercial feasibility of such centres in the locations shown.
- 13.3 Coupled to this, further consideration has not been be given within the document to the existing community facilities located within Chattenden such as the community centre, church building and existing primary school and how these facilities 'fit' into the future vision for a Neighbourhood Centre. Homes England would be keen to see existing community facilities integrated within new development so that they can become a sustainable part of the new vision for this area.
- 13.4 There is no reference to school provision within the vision for 'village living' in neighbourhood.
- 13.5 Consideration needs to be given to the compatibility of the proposed new relief road and primary school the safety of pedestrian crossings and appropriateness of open space provision near the road. It is important to encourage a well-designed scheme which is compliant with **Manual for Streets** and **DfL12 design guidance**.
- 13.6 Homes England supports the proposal for "A compact development to protect SSSI sites and other green spaces that surround Chattenden."

  However, it would be helpful for the document to have perhaps clarified as to what 'compact' means in development terms is there perhaps the potential for higher density development in this location?
- 13.7 No reference within the supporting bullet points is made as to how the proposed relief road will integrate into the Village Living 'vision'?
- 13.8 The illustrations indicate the promotion of a Home Zone Approach Homes England would support this approach being applied to the Chattenden Village area as this approach is associated with design interventions that slow traffic through residential developments.

- 13.9 Homes England queries why the document is not showing enhanced links between Chattenden and Deangate? Please refer to the attached sketch which shows better connected green linkages between these sites.
- 13.10 In reference to the text suggesting that terraced and semi-detached houses will be the predominant housing typologies, it is Homes England view that guidance around future house types in this location should be kept more flexible Homes England suggests an approach in that "A range of housing types should be provided to accommodate for different households, ages and lifestyles and to create a neighbourhood which caters for diversity and inclusivity" which would enable a market facing scheme for each individual site to be developed.
- 13.11 No key is provided on the plan so it is unclear what the green dashed routes are? The plan shows an "indicative new connection" through the north east of the Chattenden area towards the SSSI. Promotion of access to and recreational impacts on the SSSI should be carefully considered alongside feedback from relevant statutory bodies / consultees.
- 13.12 Homes England suggests that some reference could have been made that the intention should be that development should also be designed flexibly around important tree/tree groupings/existing landscape features.
- 13.13 The commentary places very little emphasis on how Village Living in Chattenden will be sustainable.
- 13.14 The setting out of indicative housing numbers for Chattenden Village would have been helpful to enable readers to understand the potential future scale of development in this location.
- 13.15 There are considerable areas of previously developed /brownfield land (such as Lodge Hill Camp) shown as existing open space within the Lodge Hill site. It is important that existing (brownfield) development is identified even on high level plans. T
- 13.16 It is felt important to make the point that whilst the plan in this section is deliberately high level, there are areas located in the northern part of the of Lodge Hill estate that are open land but sit amongst areas within the notified SSSI these areas must not be misconstrued as SSSI land or existing open space (or publicly accessible).
- 13.17 The plan requires annotation as there are green arrow annotations which are assumed to be new created vehicular and pedestrian routes.

	13.18 It would have been useful for the existing mature vegetation referenced in the supporting text to be identified on the plan.
14	14.0 Parkland Living in Deangate
	14.1 Homes England query whether a country park is going to be shown in this location, given the indication that it is characterised as "Parkland living"?
	14.2 Homes England queries the developable area in this character area, as currently drawn it is difficult to distinguish where development / parkland areas will be provided.
	14.3 Very little information is provided in relation to the indicative neighbourhood area.
	14.4 There is no mention of the Chattenden Woods and Lodge Hill SSSI here, yet the SSSI sits adjacent the north of the "Deangate neighbourhood area" (and in fact there is notified SSSI within the Deangate Ridge site) which is not made clear in this section.
	14.5 In addition to page 13 it is unclear what the green dashed routes are and a key is not provided on the plan. Homes England also underline the importance of connectivity and green linkages between neighbourhoods / character areas (i.e. Parkland Living in Deangate to Village Living in Chattenden).
15	15.0 Rural Town Living in Hoo St Werburgh
	15.1 Opportunities for higher densities should be set out across the proposed new town where appropriate, and it may be worth Medway Council suggesting higher densities would be appropriate closer to new facilities where appropriate.
	15.2 There is no key associated to the plan which would have been helpful to understand the spatial relationship between the Historic Centre and other Neighbourhood / Character Areas (i.e. Chattenden).
16	16.0 Riverside Living in Cockham Farm
	16.1 There is no key associated to the plan which would have been helpful to understand the spatial relationship between the Neighbourhood / Character Area of Cockham Farm with Chattenden, which sits to the West, in terms of connectivity, landscape led routes across the SSSI areas etc.

	16.2 It would have been helpful to understand how the proposed Country Park (sitting adjacent to Cockham Wood Fort) works in wider open space terms with other significant open greenspace areas in the Hoo Peninsula as part of a coordinated open space / greenspace strategy.
17	17.0 Contemporary Living by the New Rail Station
	17.1 Homes England would outline the importance of the existing centre in Hoo, so development around the proposed new station does not detract from its vitality and viability when considering the additional provision of services and employment.
	17.2 It would be useful to understand how the provision of a new rail station feeds within a wider sustainability vision for the Hoo Peninsula and how it assists the various Neighbourhood / Character Areas to come forward.
18	18.0 Village Living in High Halstow
	18.1 No comments.
19	19.0 A Thriving Employment Hub in Kingsnorth
	19.1 Homes consider that it is important to highlight the benefits of new additional employment close to new dwellings which would provide additional jobs closer to new homes. This neighbourhood would be complementary to commercial interest in the wider Hoo Rural Town.
	19.2 It would have been have been useful to have seen some commentary on the wider employment strategy associated to the Hoo Peninsula and how a major employment at Kingsnorth (for example) could perhaps work in association with the identified Neighbourhood Centres and also with other smaller locations which may be appropriate for employment-le development (i.e. Lodge Hill Camp, Flanders Farm).
20	20.0 Hoo Framework Plan
	20.1 The plan is very high level and Homes England would reiterate comments made in relation to the "Village Living in Chattenden" and the considerable areas of previously developed /brownfield land (such as Lodge Hill Camp, and the magazines) which are shown as existing open space. It is important that existing development is identified, even on high level plans. The northern area of Lodge Hill site outside the SSSI, specifically, should be shown as "non-residential development" but the description as 'green land' could be misconstrued as SSSI land or existing (accessible) open space. This area includes existing previously developed land and buildings.

- 20.2 Homes England notes about the alignment shown on Framework Plan but would like to make clear that the alignment shown in this plan is not an alignment which has been accepted by Homes England (as landowner). It is recommended that for the purposes of future consultation documents, Homes England's preferred alignment is shown and that text is added to confirm that precise alignment will be determined in due course.
- 20.3 It would be prudent for the overall masterplan to indicate that there is existing fencing around the SSSI area which restricts public access. The plan as drawn suggests that there will be open access across the whole site, which is misleading. It may also be pertinent to show the SSSI as its own colour to distinguish it from proposed neighbourhood areas and land outside this environmental designation and possibly even reflect on the benefits of restricted access for ecology.
- 20.4 There is very little information in the document about what Hoo currently has, what it needs to thrive as a sustainable settlement, and where facilities need to be bolstered to create a settlement with coherence and a heart (rather than just a collection of neighbourhoods). In that a Neighbourhood Centre and Secondary Public Space is identified within Chattenden, Homes England would have liked to have seen more clarity on how these features manifest themselves 'on the ground'. It is also recommended that precise Neighbourhood centre locations should be determined later as masterplanning progresses once the commercial need / viability is fully explored and also how these centres work collectively with other major employment areas on Hoo (Kingsnorth, Flanders Farm).
- 20.5 Further supporting information within the document regarding infrastructure such as primary and secondary schools, health services etc, would be beneficial within the document. There are number of existing 1 form entry primary schools within Hoo, including those at Chattenden and High Halstow which are at capacity. If new schools are to be proposed within these areas, a question must be raised as to how the future of the existing school(s) been considered.

### 21 **21.0** Next Steps

21.1 It would be helpful if Medway Council could indicate the proposed development trajectory assumed for the Hoo Rural Town and whether it is envisaged that this would go beyond the plan period which is currently to run until 2037.

Ref:

### Supplementary Plan – Proposed Connections across Hoo [See Concept Plan on Page 16 – below].

Homes England is suggesting a number of potential new connection routes which promote the ethos that new / improved connections should link up within one another to form loops with the following two key objectives;

- i. Promote connectivity from Chattenden Barracks towards the proposed Country Park to reduce recreational pressure on the SSSI;
- ii. Connect the new and improved connections to one another, to form a loop, or series of loops between green spaces and key facilities on the Rural Town to remove recreational impacts on protected habitats.

