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**BY EMAIL ONLY**

**Growth and Communities**

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County Hall  
Maidstone  
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Phone: 03000 423203

25 November 2022

Dear Sir/Madam,

**Re: Hoo Development Framework**

Thank you for providing Kent County Council (KCC) with the opportunity to comment on the Hoo Development Framework.

The County Council has reviewed the consultation document and for ease of reference has provided comments structured under the chapter headings within the Framework.

**Chapter 1: Introduction**

*1.1 Executive Summary - Vision*

Highways and Transportation: Through the siting of up to 10,000 homes on Hoo Peninsula, the opening of the railway station, and the Council's aspirations for the development to be led by Garden-City and Healthy Streets principles, Medway Council has a unique opportunity to create a sustainable town which offers modal choice. The County Council supports the principles of the Framework and would request that Medway Council continues to engage with KCC on the transport related issues, including potential cross boundary impacts, as the development progresses.

KCC welcomes the proposal for “*new services such as a new passenger rail station, and a new and upgraded highways network...an attractive and extensive cycling and pedestrian network...new schools and health facilities, shops, businesses, leisure and community services*”. This will reduce the impact on the Kent highway network by reducing the need to travel and encouraging sustainable modes of transport.

*1.1 Executive Summary - Proposed Framework*

Heritage Conservation: Although the consultation is high level, it is also apparent that the Framework will impact significantly on very important heritage assets. Only some

of these assets are designated, and a more detailed review is provided below. Many of the non-designated assets, however, are of commensurate quality as those that are protected and are recommended to be given careful attention during the master-planning process.

It would also be helpful if the Framework could identify ways in which the heritage of the area could actively contribute to life on the Hoo Peninsula which does not come across in the current text. Cockham Wood Fort, Grain and Slough Forts, the Second World War Stop Line and the coastal and maritime heritage all have the potential to become foci of community activity in the form of heritage walks and community projects, and is therefore advised to be recognised in the Framework.

Sport and Recreation: KCC recognises the Leisure Centre and Healthy Living Centre in the Framework, along with a proposed gym and potential location of outdoor football pitches. The County Council welcomes the walking and cycling routes connecting the Leisure Centre to the community and other green and blue space opportunities. KCC is also pleased to note that the Framework acknowledges previous development successes of positioning the Healthy Living Centre next to the Leisure Centre.

Engagement is encouraged as the proposal for the football pitches next to the Hoo Wetlands Reserve progresses to ensure these uses exist harmoniously together. Active Kent would also advise the consideration to Multi Use Games Areas (MUGA) and a potential 3G pitch in the area. It is recommended that Medway Council reviews the [Local Football Facility Plan](#) for Medway, if this has not been completed already, to identify any shortfall in the area.

The County Council would welcome a discussion on other sports such as cricket and rugby around potential sites and usage in the area.

## **Chapter 2: Context Analysis**

### *2.5 Landscape Character And Sensitivity*

Heritage Conservation: To better assess the sensitivity of the landscape of the area to change it, it is necessary to reach a full understanding of its historic aspect. For rural settlements, as is the case for the villages of the Hoo Peninsula, careful thought needs to be given to how the built townscape connects with the surrounding landscape. There is a clear and appreciable historic link between the agricultural or horticultural land of the Hoo Peninsula and the rural settlements and farms that it supported. Historic England has developed a very detailed historic landscape characterisation of the Hoo Peninsula, known as [Hoo Peninsula Historic Landscape Project](#), and this is advised to be drawn upon when assessing the impact of proposed change on the landscape. Although the text is high-level, the Historic England report is recommended to be noted as a key resource.

## 2.9 Existing Vehicular Movement

Highways and Transportation: The Framework states that “*Car ownership and usage rates on the Peninsula are much higher than the rest of Medway*”. It is therefore key to ensure that the new infrastructure recognises it but prioritises walking, cycling and public transport to encourage modal shift towards sustainable travel measures.

## 2.10 Existing pedestrian and cycling routes

### *Pedestrian Network*

Public Rights of Way (PRoW): KCC is keen to ensure its interests are represented with respect to the County Council’s statutory duty to protect and improve PRoW in the County. KCC is committed to working in partnership with Medway Council to achieve the aims contained within the [KCC Rights of Way Improvement Plan](#) and the [Medway Rights of Way Improvement Plan](#). The partnership aims to provide a high-quality PRoW network, which will support the Kent and Medway economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent and Medway a great place to live, work and visit.

KCC have no further comment to make in respect of the Hoo Development Framework proposals, but would reiterate the County Council’s previous comments made in the 2020 Planning for Growth on the Hoo Peninsula consultation, the 2020 Hoo Infrastructure Fund consultation and the 2021 Hoo Infrastructure Fund Stage Two consultation, in the following text.

PRoW matters in this location are managed by Medway Council as the Highway Authority and the County Council would therefore recommend that reference is made to, and guidance is taken from, the Medway Rights of Way Improvement Plan and the emerging [Kent Design Guide](#).

## 2.12 Heritage

Heritage Conservation: At present, the County Council is concerned that the heritage review appears incomplete and inaccurate. For such a sensitive area, and for such extensive proposals, the County Council would recommend that a formal, detailed baseline assessment is prepared by a heritage specialist. This needs to be much more detailed than the baseline heritage assessment prepared as part of Medway’s heritage strategy. The assessment is advised to review all relevant heritage information, including Historic Environment Record data and historic mapping but most especially the results of the [Historic England Hoo Peninsula area survey](#), as well as other relevant research projects such as the [Medway Valley Palaeolithic Project](#), and identify the ways that the proposals will impact on heritage assets. The assessment can also suggest ways that the heritage can contribute to the proposals more positively, for example, by helping the new build integrate effectively with existing developments and serving as high quality green infrastructure and routeways.

The text is correct to highlight the diverse nature of the heritage of the Hoo Peninsula in this section. However, its heritage is considerably older than the text suggests as, in addition to the later prehistoric discoveries mentioned, the area also contains Pleistocene deposits related to the former route of the Medway that ran across Hoo Peninsula and on into what is now Essex. There have been numerous palaeolithic discoveries on Hoo Peninsula, particularly around Hoo St Werburgh and Allhallows and this too forms part of the story of the neighbourhoods concerned.

The County Council is pleased to note the mention of the Whose Hoo Heritage Fund project which has the potential to play a significant role in raising awareness of the heritage of the Hoo Peninsula, particularly its archaeological, industrial and military heritage. The aim is that a raised awareness will lead to greater engagement with residents who can play a role in helping new development be more successfully embedded in the existing landscape and community.

### *2.13 Historic Development and Heritage*

Heritage Conservation: Although the text is correct to state that Hoo Peninsula is dominated by areas of marshland, the importance of the raised spine of the landscape should not be ignored. This is where much of the settlement lies and was key to routeways across Hoo Peninsula. It is also where many of Hoo's archaeological discoveries have been made. Key to this role is the extensive views that exist across Hoo Peninsula from the uplands down to the river shores and vice-versa. It is important that these are respected by any new development so that key assets such as churches are not 'boxed in' by new development and retain their landscape contexts. The County Council would therefore recommend that Landscape and Visual Impact Assessments are carried out to ensure this.

### *2.16 Constraints*

Heritage Conservation: Non-designated heritage assets also play an important role in the historic character of the Hoo Peninsula, and historic features such as buildings, traditional field enclosures and monuments are also integral to the area's high-quality landscape, particularly enjoyed by users of the extensive PRow network. Although it is not appropriate to this section to underline this, it would be helpful if the document emphasised that non-designated assets also play a key role in the character of Hoo Peninsula.

The Framework is advised to note that some non-designated assets are of commensurate significance to scheduled monuments and as required by the NPPF, should be treated accordingly.

### *2.18 Opportunities*

Highways and Transportation: The County Council notes that 'New / upgraded pedestrian crossings' are shown on Peninsula Way and the Main Road. It is assumed this is an error and should actually be pedestrian and cycle crossings, designed in line with [Local Transport Note 1/20 to enhance opportunities for active](#)

[travel](#). The text also refers to new pedestrian links to the river as a main attraction and KCC would recommend that cycle routes are also provided.

PRoW: It is noted that the England Coast Path passes through Hoo Peninsula. KCC advises the Framework to recognise that the England Coast Path (ECP) is a new National Trail created by Natural England and this long-distance walking route will eventually circumnavigate the entire English coastline. As part of this work a coastal margin has been identified, which includes all land seaward of the trail. Much of the coastal margin is open access land under the [Countryside and Rights of Way Act 2000](#) (CROW Act). The trail provides opportunities to boost coastal economies, improve public health and wellbeing. Opportunities should be taken to enhance the trail where possible, for example, to create new access rights for cyclists and equestrians, establish new links with the ECP to create circular routes, improve the surface of the trail and to replace infrastructure to enhance accessibility. KCC would also draw attention to paragraph 100 of the National Planning Policy Framework (NPPF), which notes that '*Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails*'.

The County Council would advise the consideration of cross-boundary infrastructure into Kent, the wider PRoW network and the impact on rural lanes, particularly with regard to the west of Cliffe Woods.

Sport and Recreation: KCC has a specific interest in community facilities and their accessibility. The County Council would appreciate more detail, as and when is appropriate, around the proposed sport and physical activity opportunities in the area.

### *Key Green Infrastructure*

Heritage Conservation: If properly designed, green infrastructure has the potential to help new development be better integrated into the existing rural and urban landscape by ensuring that it fits into the grain of what is already there. The pattern of roads, tracks and lanes on the Hoo Peninsula has been used for centuries to link Medway's towns, villages, hamlets and countryside. By taking advantage of these existing and historic routeways people will be able to move through the area while retaining the historic geography of the region, but also following routes more likely to be accompanied by historic hedgerows and planting. This has the potential to unite heritage and ecology to help people access and enjoy green infrastructure features more easily and naturally.

Using historic routeways also allows green infrastructure designers to incorporate heritage assets to provide features of interest. This will therefore help people accessing the green infrastructure to become more aware of and value Hoo's heritage which will in turn assist their conservation and re-use. For example, the Hoo area has links to internationally important fortifications at Grain. If the green infrastructure were to feature these, it would help raise their profile to assist with

conservation whilst diminishing the attractiveness of the sites for anti-social activity. green infrastructure can also be used to support tourism in Medway by linking historic sites and landscapes such as the Chatham Lines, Rochester Castle and Cathedral and the historic explosives works of the Hoo Peninsula.

To fully appreciate the Hoo Peninsula's landscape character and incorporate it into green infrastructure effectively, it is important to understand it. The main method for investigation historic landscape character is by [Historic Landscape Characterisation](#). This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape. This has been completed for the Hoo Peninsula, through the Hoo Peninsula Historic Landscape Project, and the County Council would urge Medway Council to draw on the research to identify connectivity between the heritage assets of the area.

Green infrastructure also makes an important contribution to health. Historic England has released [research](#) that demonstrates how heritage actively supports health and well-being through contributing to a generally more attractive environment, allowing activities that encourage participation and inclusion and by encouraging outdoors activities.

### **Chapter 3: Vision and Guiding Principles**

#### *3.2 Garden Communities aspirations*

Biodiversity: KCC recognises that reference has been made to Biodiversity Net Gain in the Framework in relation to green space. As part of the Environment Act, 10% Biodiversity Net Gain will be legally required by November 2023. There is a need to ensure that the proposal is considering Biodiversity Net Gain strategically, as the Biodiversity Net Gain requirement may not be possible within the open spaces.

#### *3.3 Principle 1: Landscape-led development*

Highways and Transportation: KCC recognises Medway's desire to keep the existing settlements distinctive and separate from the new settlements, and supports the proposals to maintain connections for walking and cycling.

Heritage Conservation: The County Council would highlight that the level of permeability between the existing residential area and the proposed developments is unclear from the Framework, particularly to the east of Bell's Lane. It is important that pedestrian, cycle, and where appropriate, bus routes are provided, to enable direct routes to be delivered. At the same time, measures must be in place to prevent rat running through the local residential streets. This is in line with the rural nature of the existing Hoo Peninsula and can complement the landscape-led approach of the Framework.

The text refers to the '*natural landscapes*' of the Hoo Peninsula, but these are not just natural landscapes, they are also '*historic landscapes*'. The landscape of the Hoo

Peninsula is a product of human adaption to, and management of, its estuaries through fishing and the farming of crops and livestock over thousands of years. The low-lying areas of the Hoo Peninsula have been shaped by the reclamation of the estuary, from at least the time of the Norman conquest, to provide improved salt-marsh grazing for livestock. Similarly, the pattern of fields, lanes and trackways have developed over centuries, and continue to evolve in response to changing agricultural practices. In many places on the Hoo Peninsula, the arrangement of modern fields can be directly related to the pattern of medieval farming, demonstrating a high level of landscape continuity. Below the ground there will be archaeological evidence that shows how people have settled on and farmed Hoo Peninsula since Neolithic times.

It should be noted that development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England, together with KCC and the Kent Downs Area of Outstanding Natural Beauty (AONB) Unit, has published [guidance](#) on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside. The County Council would advise the consideration of this guidance as the Framework progresses.

#### *Strategic Gaps and Ecology Buffers*

Biodiversity: The County Council emphasises the potential impact of the proposal on the designated sites. The Framework acknowledges that there are Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar designations surrounding the Framework area and has highlighted buffer areas.

However, due to the level of development proposed, KCC would recommend that there is a need for a strategic mitigation approach to be created for the designated sites, related to the works proposed within the Framework. Individual developments should not assess and implement mitigation individually as the collective impact needs to be considered and appropriate mitigation implemented as a whole.

#### *Key Green Infrastructure*

Biodiversity: The Framework proposes an increase in open spaces, particularly near the designated sites, including Lodge Hill Countryside Site, Cockham Community Parkland and Hoo Wetlands Reserve. There will therefore be an increase in disturbance on the designated sites from recreational pressure in addition to the disturbance from the development and roads. KCC would seek that open spaces and green spaces are designed to provide benefits to biodiversity, including connectivity, and that they can be managed in the long term to provide that function.

In addition to ensuring habitats will be created and managed appropriately through the site, there is a need to promote the inclusion of ecological enhancement features within the built area such as bat, bird and insect boxes or bricks.



### *3.4 Principle 2: Accessible and well-connected settlements*

Highways and Transportation: KCC is supportive of the walking and cycling principles, particularly the '*vision for growth, putting people before cars; and planned development making space for walking and cycling at the top of the transport hierarchy*'. Whilst it is understood that more detailed masterplans and applications will follow, this should be emphasised more within the Framework. For example, some of the primary streets do not have cycle routes and there is no reference to the importance of key routes to schools or low traffic neighbourhoods. In addition, it is unclear why some facilities, such as the school and leisure centre within the West of Hoo St Werburgh area, are on the outer edges of the site, rather than being centralised where walking and cycling distances would be minimised for most residents and where communities are created. The implementation of sustainable infrastructure is the first step, but it is the collective impact of prioritising sustainable modes, place making, siting of local facilities and landscaping that is key to creating a place where people choose to walk, cycle and use public transport.

The County Council would note that the Framework does not provide information about links to the wider areas outside Hoo. For example, attractive walking, cycle and public transport links to other areas of Medway or to Gravesham. The consideration of these links are recommended to be considered in order to ensure they are being provided where required and to reduce the impact on the Kent highway network.

KCC would also highlight that the Framework does not mention the approach to parking provision. It is noted that high levels of parking provision will undermine the approach to the development and is therefore discouraged. Reducing parking provision in areas which offer real modal choice can encourage a higher modal share and reduce the impact of private cars within Medway and Kent. KCC would advise that car clubs are required to bridge the gap between lower parking provision or second car ownership and sustainable modes. Consideration of the rise in scooters along with electric vehicle charging is also recommended. Electric vehicle charging will help to reduce the impact on air quality, although, it is recognised that this is now a specific requirement under the Building Regulations.

PRoW: The increased population will add to the pressure and importance of the PRoW network surrounding Hoo Peninsula. It is therefore critical that consideration is given to these highly regarded links, to ensure they are not degraded. Considering the likely increase in use, opportunities should be taken to make significant improvements to the existing PRoW, as they will increasingly serve as sustainable transport links and provide opportunities for recreation and employment.

#### *New Passenger Rail Station*

Highways and Transportation: The opportunity to develop such a large new community and reinstate the railway will afford Medway the opportunity to create an exemplar site by creating appropriate spaces for pedestrians, cyclists and public transport. Putting sustainable transport at the heart of the proposals and coupling this



with suitable place-making will therefore make Hoo an attractive place for residents and visitors and will encourage people to use these modes.

PRoW: The wider environment, that is the impact on the County of Kent, should be acknowledged. A new rail station with links to London, transport links to highway networks including the proposed Lower Thames Crossing, together with 12,000 new homes will increase pressure on all networks. Given this scale of the proposed development and population growth, the Hoo Peninsula improvements would be expected to have a significant impact on these networks, as residents seek opportunities for outdoor recreation and leisure in the countryside.

Heritage Conservation: The County Council understands that a new passenger rail station is proposed near Sharnal Street, and would draw attention to its comments in respect of Section 5.5, which are also applicable to this Section.

#### *Public Transport Network*

Highways and Transportation: The introduction of new bus services is key to providing an alternative mode of transport to private cars, however, these must be high frequency services with high quality stops in order to realise their potential. The County Council would advise that reference is made to the frequency of services or the provision of bus lanes or bus gates to prioritise this mode, particularly as some of the roads are highlighted as being congested. KCC welcomes the new bus link shown south of the Four Elms roundabout as it will allow the bus to bypass congestion at the roundabout. However, the County Council is concerned that no bus routes are shown on Peninsula Way where it is assumed the traffic will be queuing.

### *3.6 Principle 4: Attractive and Tailored Built Form*

#### *Housing Density Distribution*

Highways and Transportation: Ideally, the development would be centred around the railway station, making journeys on foot and by bicycle shorter, however, it is noted that a proportion of the higher density dwellings are located adjacent to the station, which is beneficial.

The County Council is supportive of the implementation of design codes, which will help to set the tone for the site and ensure routes are cohesive and legible, and of the same high quality throughout the development.

## **Chapter 5: The Neighbourhoods**

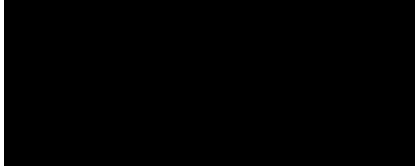
Heritage Conservation: The County Council notes that all the proposed Neighbourhoods contain significant heritage assets. These are strongly recommended to be accounted for during masterplanning and flagged within Appendix A.

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KCC would welcome continued engagement as plans progress for potential growth opportunities on the Hoo Peninsula.

If you require any further information, please do not hesitate to contact me.

Yours faithfully,



**Stephanie Holt-Castle**  
Director – Growth and Communities

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[Appendix A](#): Heritage Conservation Comments – Chapter 5