

25 November 2022



Medway Council  
Gun Wharf  
Dock Road  
Chatham  
ME4 4TR

**VIA EMAIL ONLY**

Dear Sir/ Madam

**RESPONSE TO HOO DEVELOPMENT FRAMEWORK CONSULTATION DRAFT**

**Obo. Berkeley Homes (East Thames) Ltd**

Savills is instructed by Berkeley Homes East Thames (BHET) and Berkeley Modular (hereafter referred to as Berkeley) to submit representations in response to the Hoo Development Framework (HDF) Consultation.

BHET and Berkeley Modular are operating divisions of Berkeley Group PLC - which was formed in 1976. The Berkeley Group strives to undertake developments to the highest standard and their attention to detail is paramount to Berkeley's continued success as a major house builder, earning them a Net Promoter Score of +77.2% in 2021-2022, outperforming the industry average of +45% (House Builders Federation).

Founded in 2017, Berkeley Modular represents a major step forward for the UK housing industry. Combining Berkeley Group's homebuilding expertise with the advanced manufacturing technologies of the aerospace and automotive sectors

Berkeley is keen to establish an additional facility within the Hoo Peninsula to create a functional relationship with the existing factory at Northfleet and boost the delivery of high-quality homes across the UK.

Context

BHET currently control land to the north of Eschol Road, see attached Site Location Plan (ref 0603 rev A), here-in referred to as 'the Site'. The 14.27 ha greenfield Site is currently in agricultural use and is immediately adjacent to the existing employment area, including London Medway Commercial Park and Kingsnorth Industrial Estate. London Medway Commercial Park accommodates several large-scale businesses, including Amazon, Wincanton, Sicame, KKB, I&A Communications and Noatum Logistics.

An application for 'Employment development to provide class B2, B8 uses, including office and research development comprising Class E uses, and associated landscaping, external storage, access and infrastructure' is targeted for submission in December 2022.

The proposal has potential to accommodate a sustainable high quality employment development delivering many public benefits, including:

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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1. Significant employment generation
  - ✓ Around 250 new permanent jobs.
  - ✓ High quality job opportunities for local people, including in high-skilled manufacturing, research and development, and management.
  - ✓ Permanent increase in local spend.
2. Provision of skills and training opportunities
  - ✓ Opportunities for career progression and training.
  - ✓ Apprenticeships to be targeted at young people in the local area.
  - ✓ Establishing links with local training providers.
3. The delivery of a highly sustainable location for employment growth
  - ✓ Shuttle bus for employees.
  - ✓ Encouraging use of cycling and providing electric vehicle charging points.
4. Carbon reduction commitment
  - ✓ Overall proactive approach to reducing embodied carbon.
  - ✓ Advanced manufacturing facility to support housing growth and more sustainable and low carbon housing.
  - ✓ Responding to Council's 'high level priorities' following the declaration of a climate emergency in 2019.
  - ✓ Targeting BREEAM Very Good.
  - ✓ Low carbon heating systems with clean on-site energy production for the office.
  - ✓ Solar PV panels proposed on the roof with the building orientated to optimise passive solar gain.
  - ✓ Modernising production to achieve higher standards of sustainability.
5. Commitment around biodiversity net gain
  - ✓ Delivering in excess of 70% biodiversity net gain across the proposal.
6. Other commitments to addressing climate change
  - ✓ Water efficient - Design and provision of rainwater harvesting.
  - ✓ Waste reduction achieved through modular operations compared to traditional construction methods.
7. Consideration of staff experience and welfare of the staff
  - ✓ Inclusion of breakout space for mental health, a gym, cafeteria, picnic tables and opportunity for Site walks.

**In accordance with this, these representations focus on the land controlled by Berkeley within the HDF and provide responses to those questions relevant to the Site within the consultation.**

**Q1a. To what extent do you agree/ disagree with the proposed vision?**

**Purpose of the Hoo development Framework**

The HDF intends to set out a '*longer term and wider view of growth on the Hoo Peninsula*' for development up to 2055.

The HDF sets out that, ‘The Government has awarded Medway Council £170m to put in place the necessary environmental and transport infrastructure in advance of major development on Hoo. The Hoo Development Framework incorporates the HIF [housing infrastructure funding] infrastructure alongside the delivery of other wider services ensuring all are in place to support new housing and the long term, positive planning for growth. The development of Hoo into a new rural town, and associated employment areas, depend heavily on strategic environmental measures plus strengthened connections and significant upgrades to transport. This is what the HIF funding has been secured to achieve. The programme identified necessary highway improvements to the existing A228 and A289, plus a new spur road connecting the Peninsula Way / Main Road to Upchat Roundabout and Woodfield Way, alongside the delivery of a rail passenger service from Hoo on towards London.’

The Framework notes that ‘Work on the preparation of the new local plan for Medway has indicated that there is potential for development on the Hoo Peninsula as part of the wider growth strategy for Medway. Proposals for housing and economic development on the Hoo Peninsula have been included as options at different stages of consultation on the emerging local plan over recent years.’

Berkeley is supportive of Medway Council progressing the HDF. The fact it is intended to be used as an evidence base to ‘inform the ongoing work on the new local plan, and will be considered in the next stage of formal consultation on the local plan’, seems a logical approach given the current stage of the Local Plan.

**Employment designation of land controlled by Berkeley**

Our response to this question focuses on the employment designation of the Site.

The Site controlled by Berkeley Homes is identified within the HDF development area and identified for its potential for employment use throughout the document, as clearly illustrated within the masterplan on page 73. Section 2.17: opportunities summary includes a plan, which again illustrates the Site as being included within a ‘major employment zone’. As illustrated on the masterplan in the HDF, the Site is located within the Kingsnorth Employment area close to East of Hoo St Werburgh neighbourhood, Sharnal Street railway station (and multi-modal interchange) and the main commercial centre.

The proposed employment zone is a logical position for B2 and B8 uses within Medway as it provides an opportunity to facilitate the logical extension of existing employment at Kingsnorth and London Medway Commercial Park – creating and strengthening a skills hub within Hoo.

Savills has undertaken an ‘Industrial & Logistics Needs Assessment’ (ILNA) to support the December 2022 Planning Application. As part of this, they set out how the Site clearly fulfils the key criteria for industrial uses. These findings are summarised in Table 1 below.

*Table 1: Industrial & Logistics Needs Assessment of the Site*

Key attribute	Assessment
Good, level developable site	<p>The Site AOD ranges from 7.46AOD (to the east) to 10.87AOD (to the west) with a gradual slope across the Site north to south and from the west to the east of the Site, the main fabrication and office building is to be in an area that ranges from 9.38AOD to 7.38 AOD.</p> <p>The current proposal is to have the facility at a finished floor level of 9.20AOD requiring minimal earthworks to level the development platform,</p>



	<p>utilising displaced material to the periphery within the landscaping scheme.</p> <p>While the Site is bisected by Pylons and Water Mains, these have been considered within the design.</p>
Motorway / A-road access	<p>Access is required to the M2 and A2 to enable movement between this existing facility and BMF2.</p> <p>The Site is located within 7.6 miles (10-minute drive) of Junction 1 of the M2.</p>
Ability to serve markets within 2hr drive	<p>19 million people (32% of England and Wales's population) and 996,000 businesses (40% of England &amp; Wales's businesses) are reachable within a 2-hour drive of the Site. This includes the major and growing conurbations of London, Canterbury, Crawley, Brighton &amp; Hove and Cambridge – all of which have high levels of housing need.</p> <p>This indicates that BMF2 will be able to provide ready access to suppliers as well as a wide geographic coverage of potential housing sites.</p>
Availability of good workforce with range of skills	<p>Within a 40-minute drive time from the Site 991,500 working-age people are reachable, representing a high level of workforce accessibility and a considerable labour pool for BMF.</p> <p>This area includes much of Southeast London and North Kent.</p>
Access to intermodal facilities	<p>Within the 2-hour catchment numerous port, rail and motorway infrastructure is accessible including Chatham Port (7 miles (17 minutes' drive), London Thamesport Intermodal Rail Terminal (6 miles (13 min drive)).</p> <p>Ipswich Griffin Wharf, Radlett SRFI, Willesden Euro terminal, Barking, Dagenham, Tilbury Port 1, Tilbury Riverside and London Gateway Port, also all fall within 2-hour drive time.</p> <p>Proximity to these key freight movement facilities will provide ready access to any raw materials brought into the country that BMF2 may use as part of its industrial processes.</p>

Berkeley therefore fully welcomes and supports the employment designation of the Site and the contribution that the Site can make to Medway's employment needs.

**Q2. Please tell us what you think about any aspect of the proposed key principles**

Landscape

Section 2.5 of the Framework includes a Landscape character and sensitivity analysis. The Framework area is divided into 10 separate landscape parcels. The Site falls within the parcel titled, Land East of Hoo St Werburgh.

The Framework describes this area as *'Undulating, predominantly arable farmland with large open fields and little sense of enclosure, extensive views from higher ground towards estuaries. A freight rail line and a watercourse follow the valley floor while the land rises gently on either side to the east and west'*.

*Sensitivity to development: LOW / MEDIUM*

*Potential design responses being considered include:*

- *Development should utilise appropriate green buffers to integrate schemes with the wider landscape.*
- *Maximise opportunities of local assets within design proposal including existing field patterns, water body, heritage assets and views of estuary.*
- *Development should protect the separation of, rural character and open countryside between rural settlements.*
- *Strengthen and increase the landscape structure and biodiversity value through the development and implementation of a Green Infrastructure strategy.*

It is considered that the conclusion of the landscape character and sensitivity analysis broadly reflects the site-specific work that Berkeley has undertaken for the Site and that it has a 'low to medium' sensitivity and can accommodate the proposal in many situations without significant character change. It is therefore helpful to also have these conclusions confirmed by the Council's own work.

The potential design responses are all considered reasonable, subject to being applied with a degree of flexibility in recognition of Site specific matters.

#### Accessible and well-connected settlements

Within Section 3.4: Principle 2: Accessible and well-connected settlements, 'New Passenger Rail Station' marks the walking distance to the planned new railway station. This demonstrates that The Site would be around a 10-15 minute walk to the new passenger rail station.

Later within Principle 2 under 'Public Transport Network', the plan (page 60) highlights the proposed new bus link to the south of the site.

The last section of this principle, 'Pedestrian and cycling connectivity' illustrates the proposed pedestrian/cycle route planned around the western and southern boundaries of the site.

The Travel Plan to be submitted with the forthcoming application aims to set out a series of initiatives to provide staff with an enhanced range of sustainable transport opportunities and reduce single occupancy car use and maximise sustainable forms of travel such as walking, cycling and public transport. The design approach of the proposed scheme is underpinned by the principles of the Green Evolution of Industrial and Logistics, including a commitment to a comprehensive travel plan, alternative parking options with EV Charging, co-location within on-Site offices, sustainable drainage strategy, biodiversity net gain and renewable energy options.

All three points of the HDF (accessible and well-connected settlements, public transport network and pedestrian and cycling connectivity) are reflected in the site-specific work already undertaken. These measures would all contribute to further improving the Site's accessibility and connectivity with surrounding areas, in turn contributing further to its sustainable locations and are all supported.

**Q5. Do you have any other comments?**

Our further comments relate specifically to the technical assessment and ambitions for the site.

**Flooding** – Section 2.7 Water and flood risk, notes areas of the Site liable to flood. It is noted that there is now more detailed site-specific work for the Site, which will be included within the forth-coming planning application. Therefore any detail presented within the HDF should note the basis of the information and that any applications may contain more detailed work which would supersede the information within the Framework.

**Power lines** – Section 2.15 provides a constraints summary and identifies the power lines to the east of the Site. The proposed Modular Factory has not provisioned for the proposed cable tunnelling of the overhead power lines, utilising this space to create an ecological corridor to the east of the site.

**New blue infrastructure** – Section 2.18: opportunities refers to ‘potential new blue infrastructure’ and that

- *The Framework should seek to enhance the setting of the land within flood zone 3 to incorporate enhanced ecological habitats, whilst also making use of design principles of sustainable drainage systems (SuDS).*

It is not fully clear what the expectations are around this point. Whilst Berkeley fully support the provision of overall biodiversity net gain enhancements to a site, any such requirement should avoid prescriptively setting out how this should be achieved.

**Conclusion**

We hope that our comments are helpful in informing the progress of the Hoo Development Framework and evidence base for the new local plan.

We wish to continue to contribute towards the future stages of the Local Plan process and therefore would be grateful if the Council could advise of further opportunities for participation and the submission of representations.

Please do not hesitate to contact me if you have any questions regarding these representations or require any further information.

Yours faithfully,

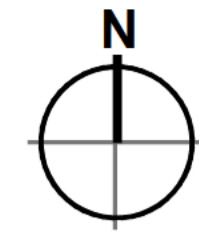


**Julia Mountford**  
Director

Encl. Site Location Plan (ref 0603 rev A)

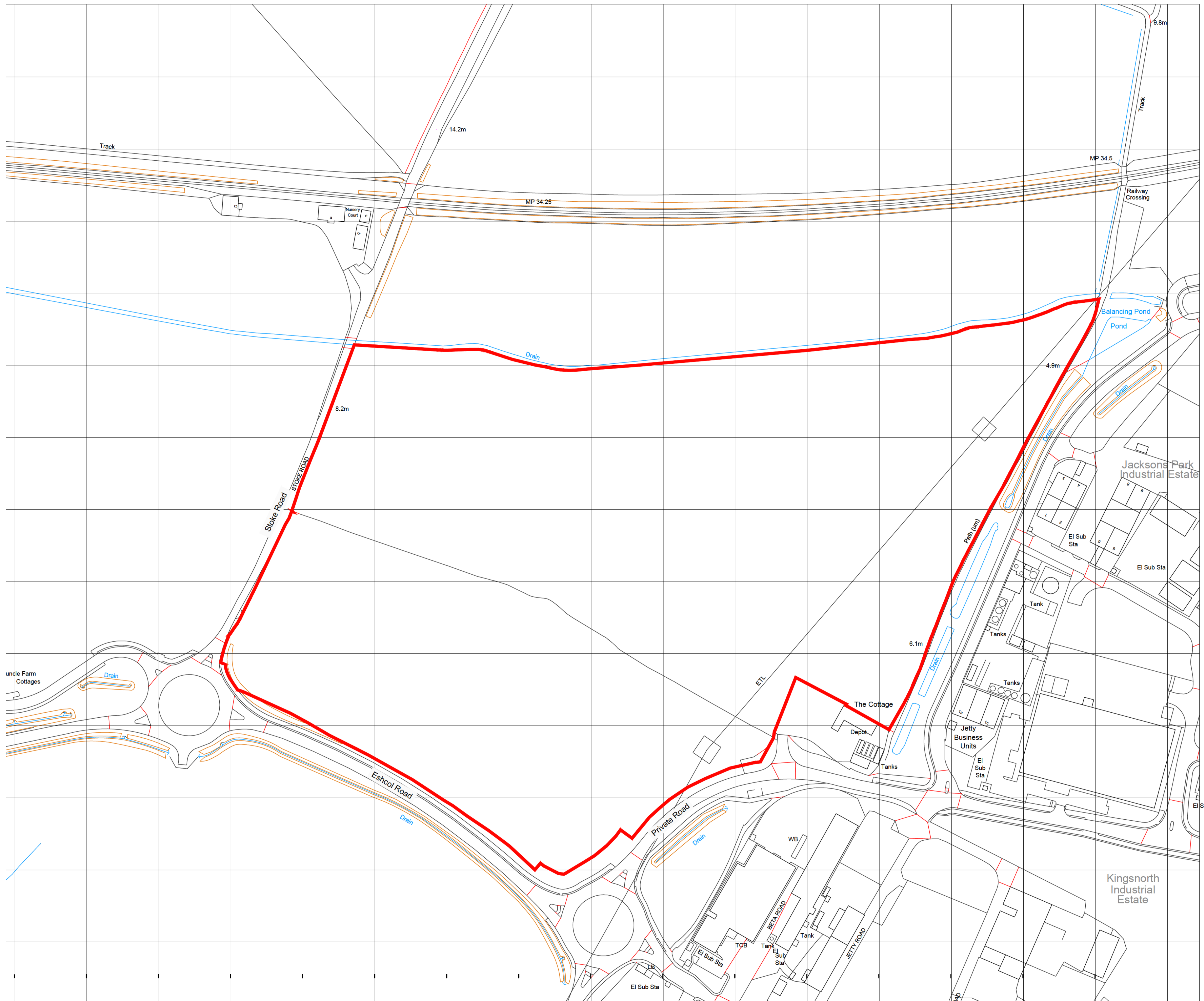


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KEY

——— Berkeley Planning Boundary:  
 35.3 Acres (14.27 Hectares)



rev	amendments	by	ckd	date
A	First issue	LK	GM	14.11.22

Modular Production Facility 02,  
 Hoo, Medway  
 Site Location Plan

**Berkeley**  
 Modular



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