
Hoo Development Framework Representations

Prepared by Barton Willmore, now Stantec
on behalf of Goodman

November 2022

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APPENDIX A – London Medway Commercial Park Masterplan

1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Goodman in response to Medway Council's Hoo Development Framework Consultation Document (September 2022) ('Framework') and detail the comments and objections of Goodman.

- 1.2 Goodman is the developer of the London Medway Commercial Park (see Appendix A), which lies to the immediate east of the Framework area and is described in the consultation documentation as part of the 'Kingsnorth Employment Area'. Goodman has a direct interest in the emerging Local Plan, including this informal consultation on the Framework and the long-term development strategy for Medway.

2.0 LONDON MEDWAY COMMERCIAL PARK

- 2.1 Goodman's land is brownfield in nature and has a significant history of previous uses. Between the 1920s and 1970s the land was used by the Berry Wiggins Oil Refinery. The refinery was subsequently demolished and the land was used for various industrial and power station projects. It was subject to significant infilling including dredging from the River Medway and pulverised fuel ash from the Kingsnorth Power Station. The main contaminants associated with the site were fuel oils and tars, alongside elevated metals associated with the pulverised fuel ash.
- 2.2 London Medway Commercial Park is allocated for new industrial, storage and distribution development in the adopted Medway Local Plan under Policy S12. Following the 'original' outline planning permission in 2009 (ref MC/08/0370), it has also been the subject of a series of planning permissions in order to remediate the land and realise the economic development envisaged by the allocation.
- 2.3 London Medway Commercial Park is currently under development:
- Completed elements include ground remediation, the estate road network, highways upgrades to provide connectivity to the A228 and ecology-led green infrastructure improvements. In addition, the implemented plots have realised high quality and modern commercial facilities for Wincanton, Noatum, Amazon, KKB and Sicame;
 - Remaining areas to accommodate additional economic development comprise Plots 1c, 2 and 8. Buildings of a range of sizes can be accommodated within these areas, totalling some 64,500sqm (694,250sqft)

3.0 ADDITIONAL DEVELOPMENT AT HOO

- 3.1 It is noted that the comments gathered through the current consultation will inform ongoing work on a new Local Plan for the area. Goodman is supportive of the plan-led approach to development on the Hoo Peninsula, because that is the approach advocated in the NPPF (Paragraph 15).
- 3.2 In broad place-making terms, Goodman is supportive of the principle of further growth on the Hoo Peninsula.
- 3.3 The right additional development could add to the overall sustainability of the location by providing a critical mass of activity in order to support improved services. It could also help to meet local needs, including new homes and improved connectivity, alongside other economic, social and environmental priorities.
- 3.4 Nevertheless, it will be vital to ensure that further growth on the Hoo Peninsula does not compromise the continued success of London Medway Commercial Park. Therefore, as detailed below, care should be taken in order to ensure that any masterplan provides for the following:
- A distribution of new uses in order to avoid conflict with London Medway Commercial Park;
 - Appropriate phasing of commercial development in order to prioritise the development of brownfield land.

4.0 MIX OF DEVELOPMENT IN THE VICINITY OF STOKE ROAD/ ROPERS LANE

- 4.1 The vehicular access to London Medway Commercial Park for commercial traffic (including HGVs) connects to the A228 by means of Stoke Road and Ropers Lane. This route is additionally used by staff cars and other visitors. A dedicated footway/cycleway is also provided.
- 4.2 Major upgrades to Stoke Road and Ropers Lane have been delivered by Goodman over the past decade. The upgrades were secured as part of the S106 Agreement for the 'original' outline planning permission. The upgrades ensure the provision of safe and appropriate 24-hour access to London Medway Commercial Park for vehicular traffic, cyclists and pedestrians.
- 4.3 The upgrades to Stoke Road have also provided significantly improved connectivity for Goodman's neighbours, including Damhead Creek Power Station, Kingsnorth Industrial Estate and the former Kingsnorth Power Station.
- 4.4 However, it is noted that the Framework (as illustrated within figure 4.2 Hoo St Werburgh summary Framework diagram) proposes new development alongside Stoke Road and Ropers Lane:
- New employment uses are proposed alongside the eastern section;
 - Medium and high density residential development (and possibly a New Centre) is proposed alongside the central section;
 - A new primary school, new secondary school and youth centre are proposed alongside the northern section.
- 4.5 In place-making terms, there is clear potential for conflict between the proposed new development and the existing commercial traffic:
- The proximity of the schools, homes and potential New Centre to the existing commercial traffic, including a high proportion of HGVs, gives rise to potential danger for pedestrians – particularly young children;

- The environmental effects of the existing traffic on the new development have not been assessed at this stage. There may be resultant noise, air quality and lighting impacts requiring mitigation.

4.6 It will be essential to ensure that the continued 24-hour access to London Medway Commercial Park is not in any way fettered by new development. The NPPF stresses the importance of this consideration by means of the 'agent of change principle', as follows:

"Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established [...] The applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed" (Paragraph 187).

4.7 In light of these comments and in order to address Goodman's objections to the mix and distribution of development, the Framework should be amended as follows:

1. The Framework should make clear that unrestricted 24-hour use of Ropers Lane and Stoke Road will be safeguarded for users of London Medway Commercial Park and other activities in the wider Kingsnorth Employment Area;
2. The mix and distribution of proposed uses should be changed to avoid the potential for conflict between the new development (ie schoolchildren and residents) and existing commercial traffic. The proposed primary school and secondary school should be relocated;
3. Provision should be made for buffer areas and screening between Ropers Lane and Stoke Road and the proposed residential development and any New Centre. The buffer areas and screening should be of an appropriate depth and incorporate effective soft landscaping including tree planting, together with acoustic fencing if necessary. The buffer areas and screening should also be supported by up-to-date technical assessments in respect of noise, air quality and lighting in order to ensure that the design of any mitigation measures is fit for purpose.

5.0 PHASING AND DELIVERY

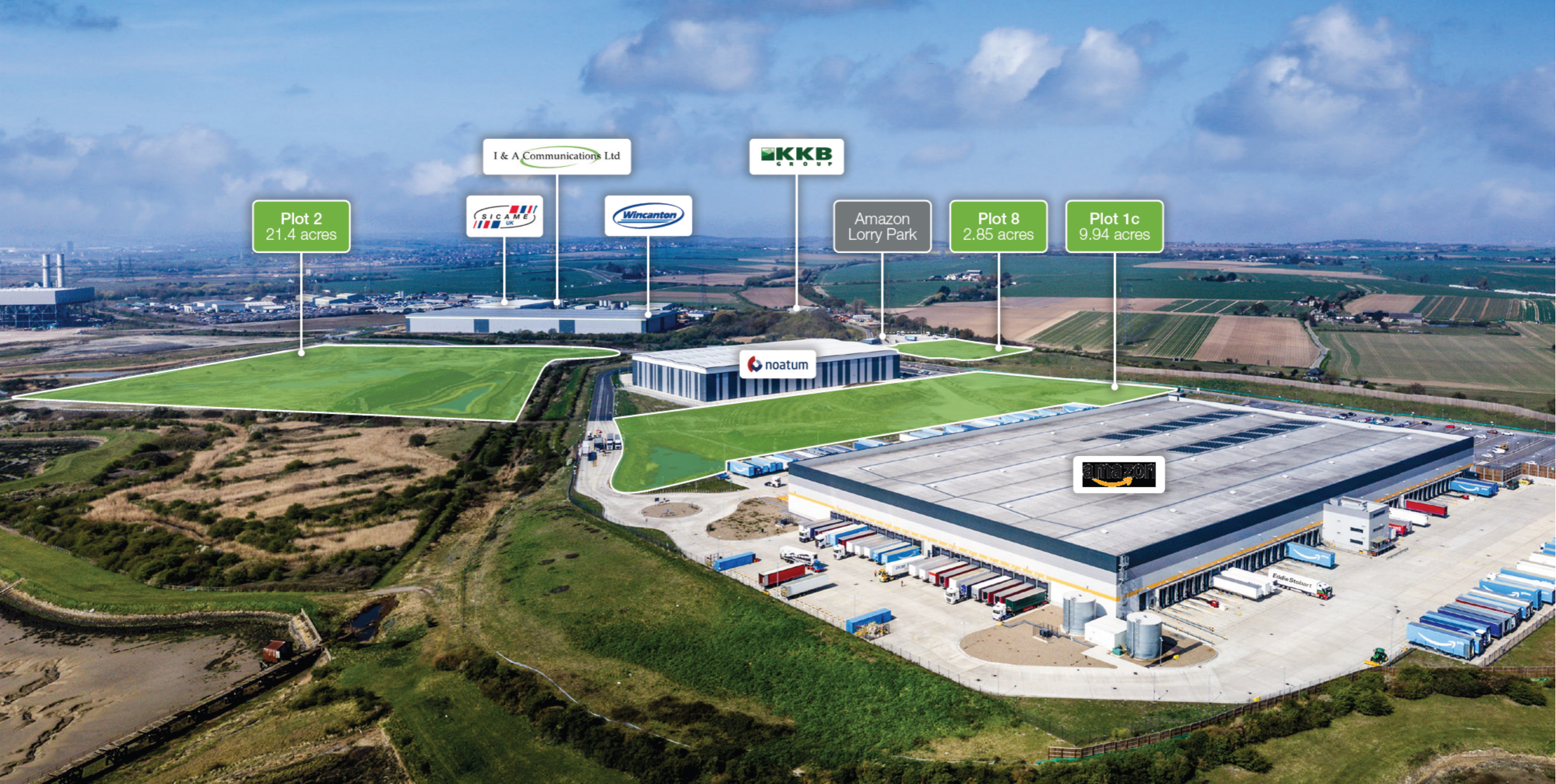
- 5.1 As noted above, London Medway Commercial Park has yet to be completed. Plots 1c, 2 and 8 are available and the subject of an ongoing and active marketing process.
- 5.2 It is noted that the Framework does not include a detailed programme for delivery and at this stage there is no phasing plan. No account has been taken of the past trajectory of take-up of employment floorspace at London Medway Commercial Park over the past decade, or indeed the potential impact on supply associated with the planning application for additional employment development at the former Kingsnorth Power Station (ref MC/21/0979) which received resolution to grant planning permission on 16/11/22.
- 5.3 Given that the Framework proposes to release greenfield land for employment uses in the vicinity of London Medway Commercial Park, it is considered that further consideration of the programme and associated phasing is required, for the following reasons:
- In terms of development economics, the greenfield land that has been identified for employment uses in the Framework is relatively unconstrained. It is therefore cheaper to develop than London Medway Commercial Park, which is restoring and regenerating contaminated brownfield land;
 - London Medway Commercial Park is an established commitment for Medway Council, as confirmed by its allocation in the adopted Local Plan;
 - Failure to put in place proper phasing safeguards would mean that the completion of the brownfield London Medway Commercial Park allocation would be halted, because it would be commercially undercut by cheaper greenfield land.
- 5.4 Furthermore, it should be highlighted that the NPPF supports making effective use of brownfield land and this must be an important consideration for Medway Council when plan-making and when determining planning applications, as follows:

'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land" (Paragraph 119).

5.5 In light of these comments and in order to address Goodman's objections regarding phasing, the Framework should be amended as follows:

1. A phasing plan should be added;
2. In respect of new employment uses, the phasing plan should make clear that greenfield land in the east of the masterplan area will not be released until there is no more available land at London Medway Commercial Park.

Appendix A
London Medway Commercial Park Masterplan



Plot 2
21.4 acres

I & A Communications Ltd



KKB GROUP

Amazon
Lorry Park

Plot 8
2.85 acres

Plot 1c
9.94 acres

noatum



Eddie Stobart