



77, Commercial Road, Paddock Wood, Kent, TN12 6DS Tel: 01892 831600
[REDACTED] www.bloomfieldsltd.co.uk

Planning Policy
Planning Services
Medway Council
Gun Wharf
Dock Road
Chatham, Kent
ME4 4TR

Our Reference: 01.002.1437/TWO

24 November 2022

Dear Sir / Madam

Hoo Development Framework consultation (Sept 2022)

This submission is made on behalf of our client AC Goatham & Son in response to the Hoo Development Framework (HDF) document. This is in addition to previous submissions made on behalf of the company as a significant employer and contributor to the local economy.

AC Goatham and Son supports the broad principle of planning for growth on the Hoo Peninsula. It supports the key principles of planning for new services, protecting and enhancing the environment. They also support the key objectives of sustainability, housing balance, services, jobs and providing blue and green infrastructure.

In the 'Context Analysis' section on page 21 of the HDF document, the submission identifies land within our client's ownership as falling within Area 9, "Land south of High Halstow" where the sensitivity to development is classed as medium, i.e. where it is recognised that "*The land parcel can accommodate the proposed development in some situations without significant character change*". This point is largely agreed with; however, it is considered that the focus should be on preserving a swathe of open countryside to the north of Area 9 and allowing for further sensitive development immediately to the east of the Deangate Ridge Community centre. The extent of this is illustrated on the enclosed Plan entitled 'Area for inclusion in the Hoo Development Framework' and shown overleaf in **Figure 1**.

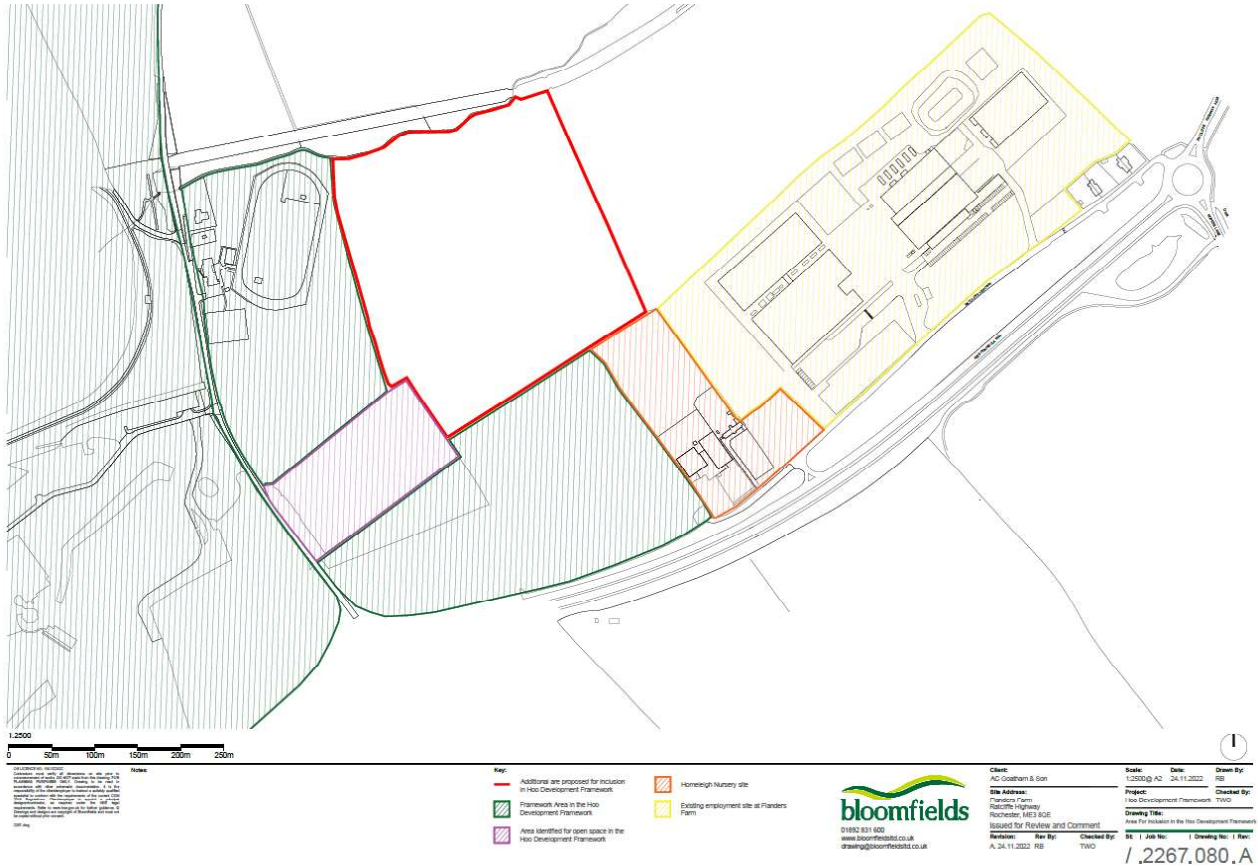


FIGURE 1 – Extract showing additional area that should be considered for allocation for residential and or employment land immediately adjacent to the Deangate Community Centre.

Sensitive development in the location identified as “Additional area proposed for inclusion in the Hoo Development Framework” (on the ‘Area for inclusion in the Hoo Development Framework’ plan and shown above in **Figure 1** outlined in red) would allow good connectivity into the proposed new community facility immediately adjoining to the west but would also be well concealed to the wider area given the topography of the land and the shelter belt of trees to the north.

The inclusion of this further land (outlined in red) within the HDF as proposed at **Figure 1** would be a good opportunity to provide blue and green buffering toward the valley which aligns with the potential design response being put forward by the LPA and has already been indicated on figure 2.79 on page 44 of the HDF consultation document and which is illustrated below at **Figure 2**.

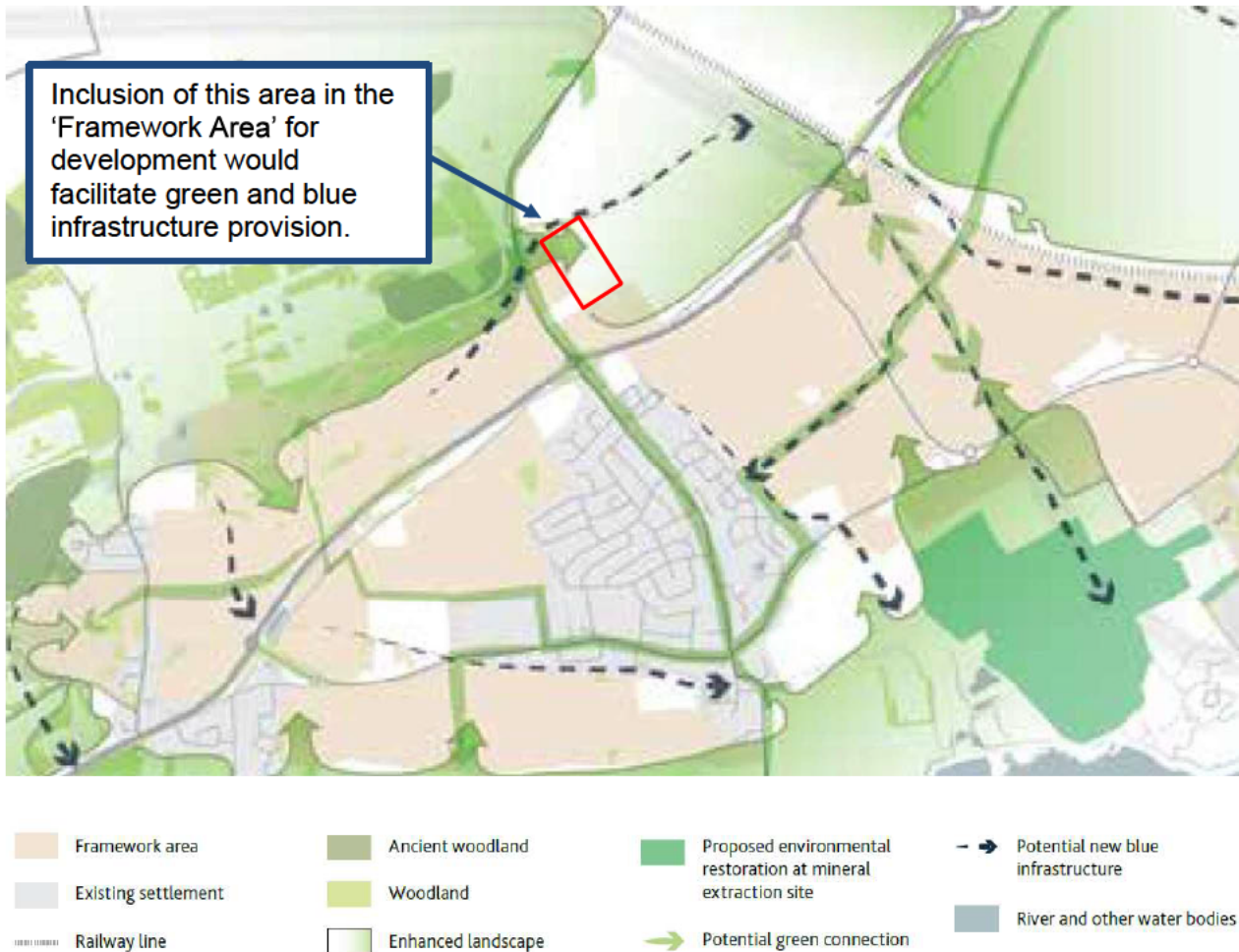


FIGURE 2 - Figure 2.79 from the HDF document showing the potential to provide a green corridor as suggested by the Council by extending the built form immediately adjacent and to the east of Deangate Ridge Community centre and north of the Framework Area already proposed.

This expanded allocation would help meet the Council's 'Garden Communities Aspiration'; as recognised at section 3.2 of the HDF document and which identifies "*The new neighbourhoods will allow Hoo St Werburgh to provide additional services and amenities to the existing residents as well as the new population and sustain their day to day needs. They will be well designed places, green and pedestrian focused, providing easy access to recreational and community activities and the surrounding settlements* [which are immediately adjacent]. *Healthy lifestyles will be at the core of the vision, with the Framework offering generous green spaces and an enhanced green infrastructure delivering great natural capital.* [our emphasis]".

The extended allocation being proposed as part of this representation would be landscape led, securing blue and green infrastructure in addition to housing or additional employment land. This approach would not only meet Principle 1 of the Council's 'Vision and Guiding Principles'; it would facilitate delivery of the blue and green corridor that is identified by the LPA in the HDF document.

Principle 2 of the Council's 'Vision and Guiding Principles' supports accessible and well-connected settlements. The area identified immediately to the east of the Deangate Community Centre and north of the existing proposed allocation at Flanders Farm is well located next to existing and proposed development in a sustainable location (as already recognised by the Council in Principle 3 – discussed further below). The proximity of the proposed pedestrian crossing to the south

further supports good connections to existing and proposed bus links, pedestrian and cycle paths; which (as already proposed in this HDF document), all link well with the proposed railway station as shown below in **Figure 3**.

PEDESTRIAN & CYCLING NETWORK

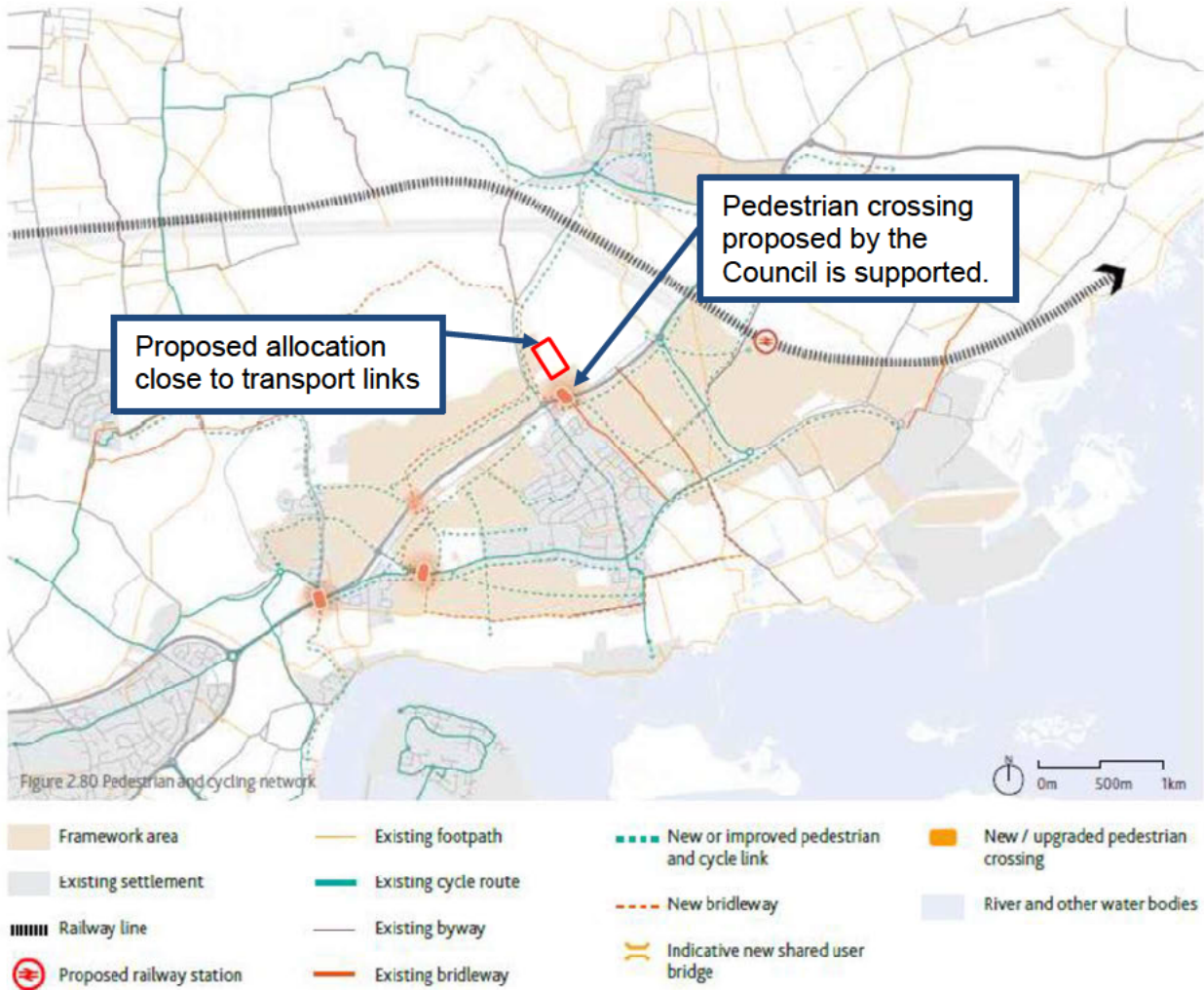


FIGURE 3 - Figure 2.80 from the HDF document showing the new/ upgraded pedestrian crossing on the A228 by Dux Court Road.

Figure 3.17 of the HDF document shows the proposed allocated area forming part of the ‘Deangate Ridge’ allocation which is recognised as forming part of a “Vibrant and Sustainable” neighbourhood. This therefore supports a logical extension of the framework area whilst still leaving a good buffer at the periphery of this area which can provide blue and green infrastructure, as indicated below at **Figure 4**. Whilst **Figure 5** shows the proximity of this area to the local community facilities which are immediately adjacent to the west.

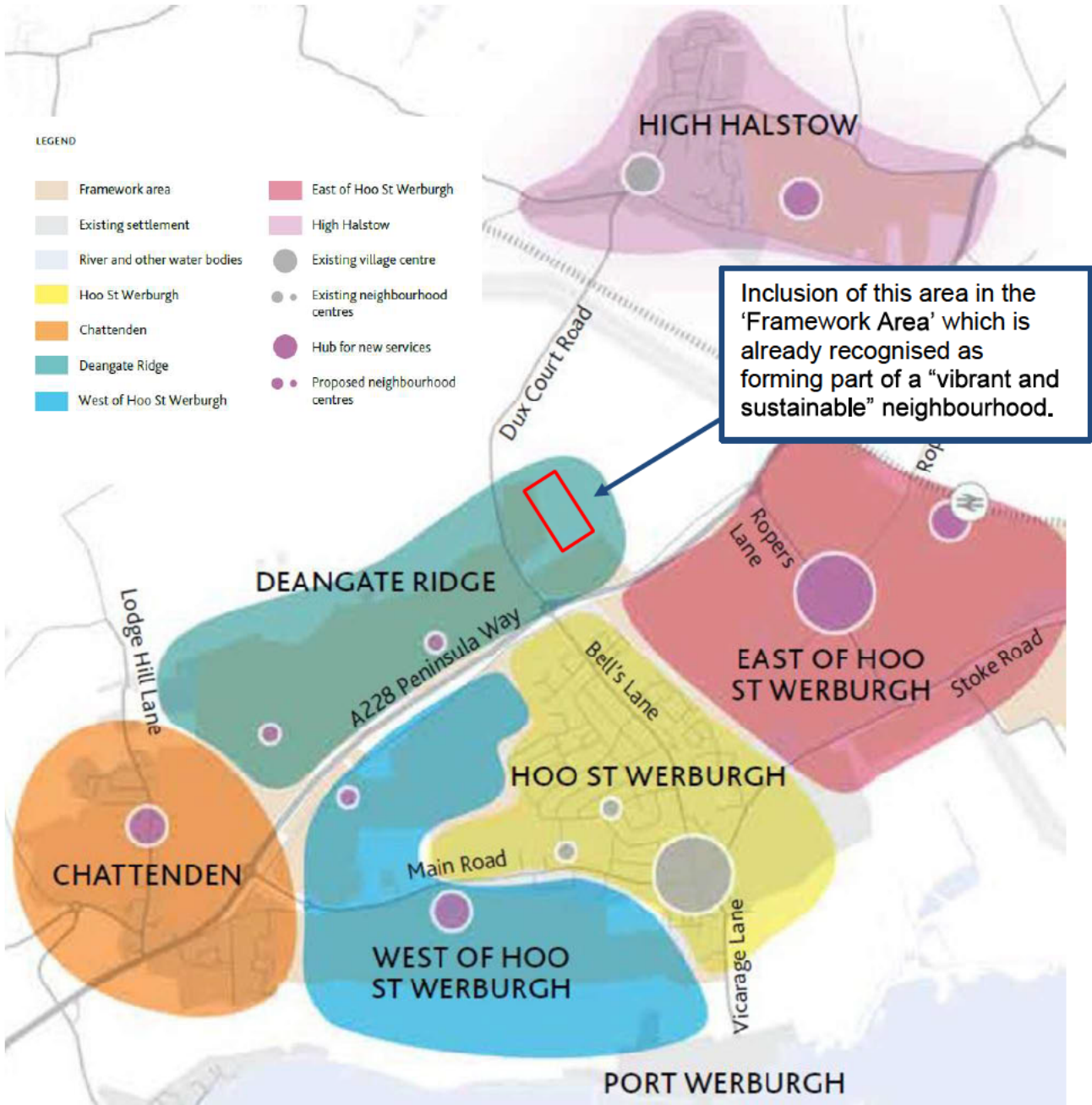


FIGURE 4 – Figure 3.17 of the HDF document that recognises “*Vibrant and Sustainable neighbourhoods*” and also showing the proposed extended allocation within this area.

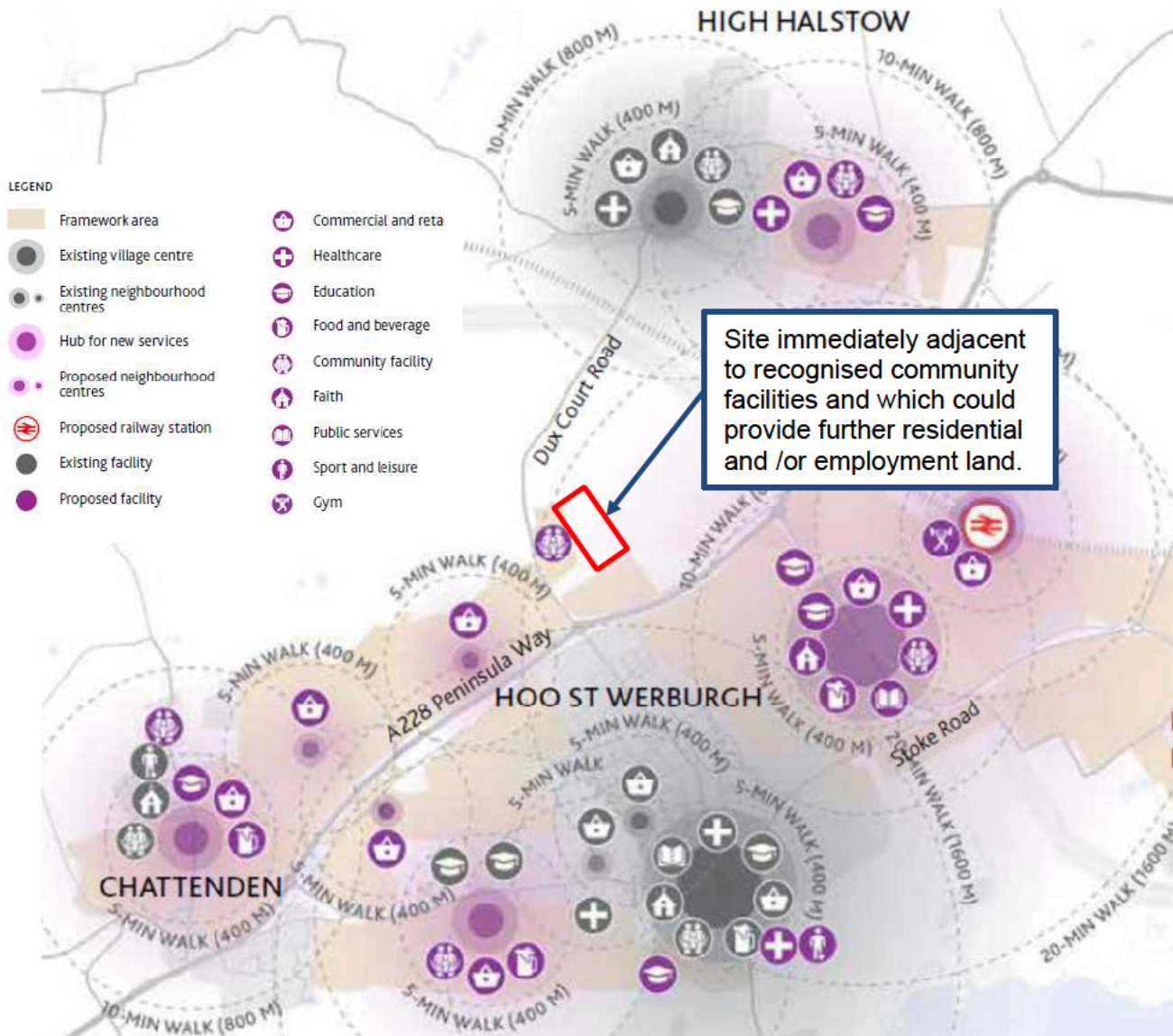


FIGURE 5 – Figure 3.18 of the HDF document showing the proximity of community facilities adjacent to a site able to accommodate residential and or employment land.

Based on that identified at figure 3.21 of the HDF in respect of Principle 4 on “Attractive built form. Housing Density Distribution” it is suggested that any housing on the proposed site be at a low density to adjoin with that proposed immediately to the west. This would allow for a higher integration of blue and green infrastructure. This would be entirely aligned with ‘The Neighbourhood Overview’ identified at figure 5.3 of the HDF document.

Page 86 of the HDF document recognises many of the characteristics being considered within the ‘Deangate Ridge’ neighbourhood and suggesting that the site at the north east corner of the Peninsula Way / Dux Court Road roundabout could be considered for employment uses that relate to the local agricultural industry. It is put forward that at this stage such a specific identified use should not be set out, but rather a general mixed-use allocation be considered in this area to ensure the correct balance can be struck with the adjacent uses which include, residential, employment and community facility uses; and which also have the potential to include blue and green infrastructure at the edge of the neighbourhood.

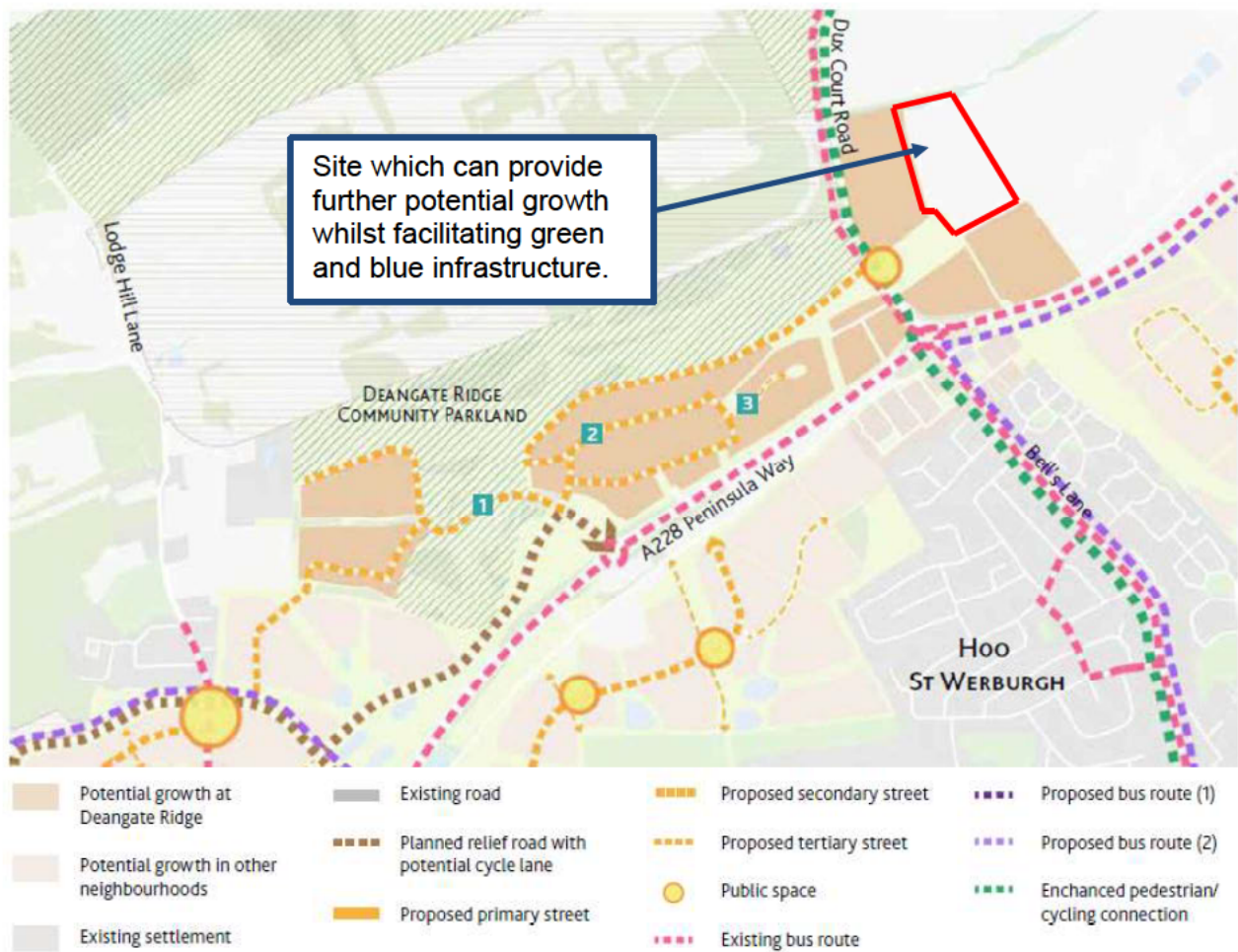


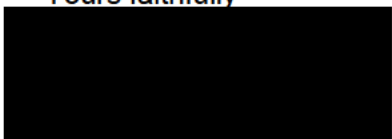
FIGURE 6 – Figure 5.21 showing the Deangate Ridge infrastructure and how well this relates to the area that is being proposed for further inclusion.

In conclusion it can be said that AC Goatham and Son are supportive of planning for new services, homes, employment land and all the while, importantly, balancing the protection and enhancement of the environment.

It is considered that this can be achieved through well located framework areas which should include a further area to the north east of the Deangate Ridge neighbourhood, immediately adjacent to a proposed new community facility which has the potential to deliver sensitive residential and employment land with good transport links, that can crucially deliver beneficial green infrastructure at the edge of the settlement.

We would welcome the opportunity to discuss further provision as suggested in the representation.

Yours faithfully



Thomas Ogden BSc (Hons) MRICS MBIAC AssocRTPI
Director