

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

Date: 25 November 2022
Our ref: 13786/01/SSL/IT1/25966340v3
Your ref:

Dear Sir/Madam

Hoo Development Framework Consultation – Representations on behalf of the Church Commissioners for England

This letter has been prepared by Lichfields on behalf of our client, the Church Commissioners for England (CCE).

CCE manages the historic property assets of the Church of England. Their Strategic Land Portfolio currently comprises circa 6,000 acres, with sites located across England. CCE seeks to promote their landholdings, where suitable, for development through the Local Plan process and work closely with Local Planning Authorities (LPA's) to demonstrate site deliverability.

CCE has significant landholdings on the Hoo Peninsula including land to the east of Hoo St Werburgh, and Kingsnorth. CCE's land to the east and west of Ropers Lane at Hoo comprises part of the wider area of land identified as having the potential to grow by 10,000 new homes over the next thirty years. The proposed new passenger railway station for the new Hoo Rural Town is located within CCE's landholdings east of Ropers Lane.

This letter comprises formal representations to the Hoo Development Framework (HDF) consultation, which sets out ambitions for potential growth on the Hoo Peninsula over the coming decades. CCE welcomes the opportunity to be involved in the consultation and is supportive overall of the aims of the HDF and the principles for future sustainable growth on the peninsula.

It should be noted that CCE is part of the Hoo St Werburgh Consortium. For the purposes of this consultation, CCE is also relying on the representations submitted on behalf of the Consortium and produced by Barton Wilmore, which set out the shared vision and response to the wider consultation. These representations will not repeat or seek to reiterate the commentary prepared by Barton Wilmore on behalf of the Consortium in relation to the land at Hoo St Werburgh, and will instead only focus on the landholdings owned by CCE.

Vision and Guiding Principles

Question: to what extent do you agree/disagree with the proposed vision?

Question: Please tell us what you think about any aspect of the proposed key principles.

CCE fully supports the proposals in the HDF for significant growth at Hoo St Werburgh and the vision for Hoo to be a thriving rural town providing homes, jobs and services creating a vibrant community. The support for these proposals is clearly set out in the submission by Barton Willmore prepared for the consortium of landowners and developers, including CCE.

Overview Comment

Question: to what extent do you agree/disagree with the Overall Framework Plan?

The key issue when considering a proposed development of this scale, spanning many years, is to allow for flexibility based around only a few fixed elements to enable development that comes forward, at the time that planning applications are being considered, to respond to changing circumstances while ensuring essential aspects are provided. It is therefore imperative that this flexibility is built into the HDF.

In terms of the fixed elements, CCE supports the location of the station, it will be important to ensure that the area around the station has been well planned to create a true sense of place for the new community.

Further, in principle, CCE has no objection to the secondary school being provided on their land, recognising that there is a need for a new school to serve the Peninsula and the growth proposed. However, they do have some reservations about the details of the location within the Rural Town and any design. It is requested that options for where the secondary school is actually located within the new Rural Town remains open, allowing for further consideration of the phased delivery of the new homes and when and where the secondary school would most sensibly be delivered to meet emerging need.

Finally, CCE recognise the potential need for other community facilities and services. However, there must be the flexibility to determine exactly what facilities and services are required at the time development comes forward, and further detailed consideration of how and where these could best be provided. For example, the secondary school could have a dual use, providing some of the community facilities that may be required and thereby become the new hub for services, while the position of any supermarket will depend on market interest and ease of accessibility. Therefore, reference in the HDF to 'potential location' for such facilities is both important and supported.

Question: Please tell us what you think about any aspect of the proposed neighbourhoods.

Supermarket Location and Local Centre Options

The Summary Framework Diagram (Figure 4.2) and East of Hoo St Werburgh Summary Diagram (Figure 5.38) show a suggested location for the supermarket, to the east of Ropers Lane, with the label

‘potential location’. CCE welcomes the flexibility that this provides so that the most appropriate location for the supermarket can be agreed at the planning application stage. In principle, the suggested site to the east of Ropers Lane is likely to be a suitable location which is well-connected to the road network and centrally located for the Hoo Rural Town. There is no need to fix the precise location of the supermarket in the HDF and the flexibility incorporated into Figures 4.2 and 5.38 is welcomed and should be retained.

Later in the HDF three options for the new centre at East of Hoo St Werburgh are provided, of which Option 2 shows the supermarket immediately to the south of the train station. This location is not supported by CCE. CCE’s alternative master planning proposals for the land adjacent to the station aim to create a true hub and real sense of place for the proposed rural town – the proposed location of the supermarket in front of or in close proximity to the station (as in Options 2 and 3) would fundamentally compromise this key principle. CCE also considers that a supermarket close to the proposed station area, would not be centrally and sustainably located to serve the new rural town.

Options 2 and 3 are inconsistent with the summary diagrams at Figures 4.2 and 5.38 and it is not clear whether all three options are intended to be included in the final version of the HDF. In CCE’s view, it is not necessary to include these three options within the HDF, as the exact details of the new centre layout will be determined at the planning application stage, and the HDF should not be overly prescriptive in this regard. The summary diagrams are sufficient to indicate provision and a potential layout at this stage.

CCE welcomes discussions with the Council regarding the most appropriate location and layout of the proposed local centre(s). CCE is continuing work on their masterplan with a focus on developing ‘walkable neighbourhoods’ amongst other sustainability principles.

Secondary School and Youth Hub

The provision of the proposed secondary school is supported. The HDF includes an additional Youth Hub in the centre of the site. The requirement for this would need to be demonstrated by evidence at the time that any planning application comes forward for development on CCE land. The Youth Hub is shown to the west of Ropers Lane in Option 1 and to the east in Options 2 and 3. It is considered that the location of the hub to the east of Ropers Lane may not be the most appropriate location; it is somewhat disconnected from the school and neighbourhood centre.

As stated above, the opportunity to integrate the Youth Hub with the secondary school as a ‘dual use’ should be considered. The location of a potential Youth Hub should not, therefore, be fixed and instead its location should be shown as potentially integrated with the secondary school.

Primary School

A new primary school is proposed at east of Hoo St Werburgh, adjacent to the secondary school on CCE land. The proposed location is supported in principle. However, it may be that it is more appropriate for the expansion of existing primary schools to meet the need for primary provision on the peninsula. The requirement for new primary schools should be fully assessed and considered at application stage. As such, the HDF should retain flexibility to ensure the most appropriate strategy for meeting primary

school need is taken at application stage; this could be achieved by labelling it as 'location for potential primary school'.

Station Quarter Uses

Figure 5.43 identifies a wide range of community uses for the East of Hoo St Werburgh neighbourhood – these include healthcare, education, community facilities, faith, public services, sports and leisure and a gym. As above, the HDF should not be prescriptive as to the type, number or location of these uses, without further detailed assessment, and Figure 5.43 should be amended to be clear that these locations are indicative.

CCE would welcome discussion with the Council regarding such facilities and the most appropriate location for them – linked to place making ambitions. It is important that the HDF retains flexibility to allow sufficient community facilities to be provided subject to the need and demand at the planning application stage. Overall, more flexibility should be built into this section of the HDF, to ensure it is clear that the community provisions will be subject to local need, and the exact locations of these uses will be determined at the planning application stage.

Residential Density

The HDF sets out three bands of residential density for the East of Hoo St Werburgh Neighbourhood. Considering the location of this neighbourhood which lies between the new station and the existing settlement edge of Hoo St Werburgh, it is not considered that a 'low density' area is necessary or appropriate to the west of the site. The densities for this neighbourhood should be two bands only, with a 'higher' density area next to the station, and 'medium' for the remainder of the neighbourhood.

The key includes suggested densities for each band (up to 35, 45 and 50 dph respectively). It is considered that this is overly prescriptive; these suggested figures should instead be included in the supporting text and it should be made clear that they are approximate guides, rather than prescriptive requirements for the density of each band. The exact densities at the site will be determined at the planning application stage through a detailed design process.

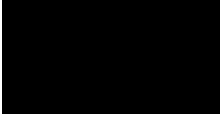
Concluding Remarks

In summary, CCE is supportive of the vision and principles of sustainable growth on the Hoo Peninsula. CCE has some concerns regarding details of the proposals for the East of Hoo St Werburgh Neighbourhood; in general, there is a need for detail in the document to be less prescriptive to ensure that there is sufficient flexibility for future planning application proposals to respond to circumstances at the time of submission. CCE is of the view that some aspects of the HDF as it is currently drafted are overly prescriptive and should be revised.

CCE welcome further engagement with the Council with regard to the masterplan for the Hoo Rural Town and the HDF. Please do not hesitate to contact me or my colleague Sally Furminger at this office should you have any queries or wish to discuss further.

LICHFIELDS

Yours faithfully



Isabella Tidswell
Planner