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**BARTON
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bartonwillmore.co.uk
26 Kings Hill Avenue
Kings Hill
West Malling
Kent
ME19 4AE
T/ 01322 374 660

By email only: planning.policy@medway.gov.uk

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

For the attention of Ms Catherine Smith

Our Ref: 29186/A3/HE/PT
25 November 2022

Dear Ms Smith

HOO DEVELOPMENT FRAMEWORK CONSULTATION (SEPTEMBER 2022)
RESPONSE ON BEHALF OF TAYLOR WIMPEY STRATEGIC LAND

I am writing on behalf of our client, Taylor Wimpey Strategic Land (referred to as Taylor Wimpey), in response to Medway Council's consultation document "Hoo Development Framework" (23 Sept – 25 Nov 2022), which relates to the proposed large-scale housing and employment growth on the Hoo Peninsula and the related Housing Infrastructure Fund (HIF) proposals.

Taylor Wimpey has a specific interest in Land West of Hoo, on land north of Main Road and south of A228 Peninsula Way and 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 Taylor Wimpey is also part of the wider Hoo Consortium. For the purposes of this HDF consultation, Taylor Wimpey is also relying on the representations submitted on behalf of the Hoo Consortium, which set out the shared vision and response to the wider consultation.

Therefore, these representations will not repeat or seek to reiterate the commentary prepared on behalf of the Hoo Consortium and will instead only focus specifically on the land that Taylor Wimpey holds an interest.

i) HDF Introduction

The HDF reflects the Council's ambitions for sustainable development setting out key principles to guide growth that meets the needs for homes, jobs and services, whilst respecting the natural and historic environment. The HDF also provides direction for how new development can respond to the climate emergency and help to achieve the Council's commitment the net zero carbon target and implement its corporate Climate Change strategy. Taylor Wimpey is supportive of these key principles to guide growth on the Hoo peninsula.

However, a key consideration at the outset is the planning status of the HDF. However, rather than repeat within this representation, please refer to 'Section ii – Role and Function of HDF in Decision-making' of the Hoo Consortium HDF response.

ii) **Context Analysis**

Section 2 of the HDF provides contextual analysis on the Thames Gateway region, the context of Medway and the context of the Hoo peninsula. Medway itself is at the heart of a rapidly changing growth corridor in the Thames Estuary, extending from Greater London to the South East.

The proposed growth in Hoo requires a major upgrade of the transport networks, including the introduction of additional bus services and routes, better pedestrian accesses and cycle lanes. Furthermore, the re-introduction of a passenger railway connection be a great benefit to the sustainability of transport links to and from the peninsula.

Taylor Wimpey is supportive of the overall aims and aspirations of sustainable development growth on the peninsula.

Section 2.5 of the HDF sets out an overview of landscape character and sensitivity as part of the contextual analysis of the study area. It goes on to state that "much of the contextual information is taken from work on a Hoo Peninsula Landscape Sensitivity and Capacity Study".

As a general comment, there is concern that reference is being made to a specific document, that was prepared as part of the evidence base for the previous Local Plan at Medway. This document was unpublished and remains in draft, has not been tested and therefore cannot be attributed any weight.

Whilst reference is made to previous assessment work undertaken to understand the landscape character of the area, it is suggested that specific reference to the Landscape Sensitivity and Capacity Study, a draft document with no weight, is removed.

iii) **Vision and Guiding Principles**

Section 3 of the HDF sets out the overall vision and guiding principles, noting that Hoo St Werburgh will be a sustainable rural town, sensitively integrated into the landscape and heritage of the peninsula and designed with the current best practices for sustainable and attractive neighbourhoods.

Taylor Wimpey is supportive of the overall aims and aspirations of sustainable development growth on the peninsula.

iv) **Framework Plan**

The overall Framework plan combines a new vision for Hoo, aspirations and key principles into an illustrative plan. Figure 4.2 provides a summary framework diagram.

The additional new homes will bring various infrastructure improvements, including a new passenger rail station, road improvements, improved bus services, and the enhancement of both blue and green infrastructure.

New homes will also bring an increased number of new services, employment and retail/commercial opportunities set within the distinctive neighbourhood centres and local hubs. Each neighbourhood will have a unique character defined by the surrounding landscape and built form.

Taylor Wimpey supports the principles as set out with the HDF, but it is imperative at this stage to ensure that flexibility is retained for future development. The precise location of housing development and supporting infrastructure will be the subject of detailed technical assessment work, and the Framework Plan should therefore be treated as "illustrative only" (ie. not set in stone).

v) **The Neighbourhoods (West of Hoo St Werburgh)**

Section 5 of the HDF presents more detail of the Framework design objectives at the local level, with the aim of developing the distinctiveness of each neighbourhood and how they connect with and complement the existing settlements.

Taylor Wimpey's interest in Land West of Hoo, which is situated within the West of Hoo St Werburgh neighbourhood. The HDF sets out that this neighbourhood will be home to a new neighbourhood centre, catering to the western part of Hoo St Werburgh, without competing with the existing centre of Hoo.

Retail and Community Uses

The West of Hoo St Werburgh neighbourhood overview sets out that other new facilities are planned at this neighbourhood, such as a new primary school at the eastern end, with a new healthy living centre and leisure centre with outdoor pitches proposed at Vicarage Lane, also in the east.

Figure 5.33 provides a Community facilities diagram, setting out existing and proposed facilities. With specific regard to Land West of Hoo, commercial and retail provision have been indicated within the site, but located towards the northern boundary, well within the site.

Taylor Wimpey supports the provision of future non-residential uses on the site, to provide facilities for future residents and existing residents within Hoo. Such facilities could comprise community facilities, retail facilities and other such supporting services and infrastructure.

However, these facilities need to be located in the most appropriate place within the site, to ensure maximum visibility and usage. Therefore, it is envisaged that any non-residential uses would likely be better placed towards the entrance of the site close to Main Road, which is not the reflected position within Figure 5.33.

Therefore, whilst supportive of such uses, Taylor Wimpey would seek to ensure that maximum flexibility is provided within the HDF when considering any future planning applications on the site, and not be so prescriptive to the location of future community or commercial uses, which will need to be assessed as part of an application and the relevant technical assessment work accompanying it.

Transport and bus links

As part of the overview of the West of Hoo St Werburgh neighbourhood, a key aim is that new bus links are proposed to ensure that the new development areas connect to Hoo St Werburgh and reduces car dependency in the Hoo Peninsula.

Figure 5.31 provides an infrastructure and public transport diagram, which also sets out existing and proposed bus routes. It should be noted that Taylor Wimpey have had initial positive discussions with bus operators in order to ensure that Land West of Hoo is served by future bus provision.

However, Figure 5.31 should be updated to include a proposed bus link through the Site, north of Main Road, which seeks to link Main Road through the Site and connect to Ratcliffe highway to the west (first phase) and to the north in the future, serving the future residential properties in this area.

Overall, Taylor Wimpey is supportive of seeking to improve and facilitate public transport to the benefit of the wider area, and future residents of Land West of Hoo specifically.

Residential Density

The HDF provides general commentary on proposed residential density and Figure 5.35 provides specific detail on density distribution within the West of Hoo St Werburgh neighbourhood. The neighbourhood overview notes that the northern part of the neighbourhood will consist of mainly 'low density' housing that is suited to the steep topography.

Low density housing is defined as 'up to 35 dwellings per hectare' and covers the majority of the land to the north of Main Road, with a small area considered for medium density 'up to 45 dph'. It is considered that this separation of low, medium and high density is too prescriptive, and flexibility will need to be provided in the use of the HDF in any future determinations of planning applications.

This flexibility needs to be maintained, given the variable topography of the site, and acceptable designs and densities will only be forthcoming following the undertaking of detailed assessment work. For example, there will be specific areas of the site that will be sensitive to a higher density, and others less so.

Density in itself is not a function solely of height and massing or dwelling mix. These detailed elements will come out of various future technical assessment work to establish the acceptability of residential dwellings on the site and the HDF at this stage should not be so rigid to determine density levels.

Therefore, it is considered that the suggested density thresholds should be included within supporting text, but made clear that they are approximate guides, rather than prescriptive requirements for the density of a site. Appropriate densities will be determined at the future planning application stage through a detailed design process.

Conclusion

In summary, Taylor Wimpey is supportive of the overall vision and principles of sustainable growth on the Hoo Peninsula, as set out within the Hoo Development Framework.

There are comments and concerns raised with regards to the status of the HDF itself, along with the reference to the Landscape Character Study, along with other more detailed comments relating to the future provision of community and retail facilities, transport links and residential densities.

Taylor Wimpey welcome further engagement with the Council in relation to the future growth on the Hoo Peninsula and the HDF.

Please do not hesitate to contact me or my colleague Huw Edwards, should you require any additional information or have any queries.

Yours sincerely



PETE TANNER
Planning Associate

cc: John Kelly, Strategic Project Director, Taylor Wimpey Strategic Land