



Hoo Saint Werburgh Parish Council

(Chairman: Cllr Lionel J Pearce)



Planning Policy Regeneration,

Community and Culture,
Medway Council, Civic Headquarters,
Gun Wharf, Dock Road,
Chatham, Kent,
ME4 4TR

Date: Feb 2016

Ref: New Local Plan Consultation Document

Hoo Saint Werburgh Parish Council is taking an opportunity to lodge their comments in respect to the above Local Plan Issue and Options 2012-2035

VISION

- 1) The document mentions establishing a vision to drive economic success at the same time as addressing inequalities. Whilst not denying that careful planning may have to be sought to achieve that vision however accommodating sustainability of the Hoo Peninsula for example must avoid harm to its natural environment of which folk are attracted. It has to be acknowledged that protecting the best of Medway's heritage and its natural environment is of paramount importance to the people it attracts. The Peninsula is not such that major change can take place without some consequence for its historic character and the way that character benefits the folk it accommodates.

STRATEGIC ISSUES

- 2) An important strategic issue would be the provision of an additional hospital perhaps a **cottage style hospital** to the West of the river Medway to accommodate folk resident in the outlying parishes who sometimes find it a challenge and a concern accessing the only facility of its type at Medway Maritime.
- 3) No comment.

HOUSING

- 4) The increase and supply of suitable and affordable homes is believed to be too open-ended. More detailed information would be most welcome on how you **define suitable and affordable**. It is quite often mentioned that the cost of housing is unaffordable for many people and that there is a lower supply of social housing in Medway. Again please explain affordable housing and how is it proposed to achieve such?

- 5) No comment.
- 6) 25% does seem reasonable but a developer providing suitable affordable housing on a site of say 15 units or more is really down to the developer having the financial will in creating a sustainable site for the future and its pressures therein.
- 7) Given the choice older folk generally opt for **single storey or ground floor living** with easy access to transport, community facilities, surgeries and shops. Ideally they should not be too close to noise and children's recreation.
- 8) There are also needs for rural housing especially for the lower end of the market (starter homes) for **locally born** and/or **locally employed** younger people. Again suitable dwellings for the older or retired folk within rural parishes would also be most agreeable where those folk have been associated and are comfortable with.
- 9) Development can make a positive contribution by creating open **recreational space** not only for the younger element and family members but for **the older element** where it tends to get forgotten.
- 10) Any large potential development site could have an element of starter homes built as part of the planning application.
- 11) Infrastructure needs vary from urban and rural areas. Rural areas are in the main remote from most major social attractions so better easy and **reliable public transport** access to the towns where most facilities are situated is necessary especially during late evening and at weekends.
- 12) No comment.
- 13) As Students are generally without personal transport they perhaps need to be amongst amenities are easily accessible where they can congregate without feeling isolated or threatened. There is belief that town centres can accommodate this type of phenomenon.
- 14) No comment.

ECONOMY

- 15) There are many opportunities for employment within existing areas which allow for growth. Office accommodation ideally requires good access with easy access to local town centre facilities whether it is for local or commuted employees. Heavy industry has to be located where space is available but again must have **good road or river access**. Light industry also has to be located where space is available but because of the nature of odd working patterns there must be allowances made for the use of private transport as public transport is generally not available during odd working hours. As a new employment site Lodge Hill was not the ideal area due to its rural remote situation which would have encouraged potential employees to commute by private transport leaving perhaps just service employees (shop staff etc due the nature of the work and poor pay) to live locally.
- 16) No comment.
- 17) All plans are only estimates and a very large crystal ball would be required to ascertain needs in 20 years time.
- 18) The creation of more local upmarket jobs emanating from **high-end employers** located in Medway may be attractive to those that already commute into London and the South-East or Maidstone.
- 19) Give employers an incentive to employ locally sourced college graduates.
- 20) The attraction to the high-end businesses must be achieved otherwise people live and work where it is financially practicable. These two do not necessarily go hand-in-hand.
- 21) It is noticeable that the river and its **wharves are under-achieving** and must be addressed by enabling some businesses to be attracted to such. Unfortunately some wharves can be quite remote from urban areas so perhaps reductions in business rates or

other financial inducement might help with relocation. It also mentions large sites on the Hoo Peninsula being well positioned where it is assumed Thamesport and LNG fall into this category. There is an opinion and therefore an assumption that large-scale industry creating movement of either workers or goods or both are presently and generally transported by road vehicles. The railway system to Grain is noticeably under-used and could open up to all types of possibilities for movement of freight or even perhaps as a **passenger link to the main railway network**.

TOURISM

- 22) The major tourist attractions are well supported by various types of accommodation around the towns but smaller sized of the more genteel type guest accommodation could support those occasional tourists rather than the larger hotels. **Riverside accommodation** could be most attractive to some tourists.
- 23) The river has an appeal which is mostly under used either for commerce or for tourism. Possibly connecting the Medway via the Thames with perhaps 2 or 3 day events by way of Southend, Greenwich and the Tower all of which have piers and local accommodation may perhaps be attractive to some.
- 24) Developing the river for commerce will perhaps see tourism as a positive and natural progression to Medway's strength.

RETAIL

- 25) Chatham is still Medway's major retail centre but in some respects is rather tired with too many charity shops. The new bus station is a large improvement on the old but can be **unpleasant to access** from the Pentagon and High Street shops during inclement weather so perhaps a covered in walkway? Chatham needs an injection of major department stores to compete with out of area centres but unless it is financially viable for those stores there is doubt that it will happen. Perhaps a need is there for a **tram service** which could connect Rainham to Strood via Rochester, Chatham and Gillingham. This could take in Gillingham's centre and the University complex through to the Dockyard and its retail centre then through to Chatham town centre then on to Rochester's tourist attractions by day and its culinary attractions by night. Parking facilities could be made available at the Dockyard. Other parking facilities are already available at the Rochester and Strood ends whereby **combined parking and travel tickets** could be made easily and reasonably available.
- 26) See above.
- 27) See above.
- 28) No comment.
- 29) All of Medway's out-of-town **retail parks should be encouraged** to flourish as **on-line retail** with its recently improved sale figures suggests it is not going away.

ENVIRONMENT

- 30) The document mentions protection throughout the Hoo Peninsula for habitats and species together with the many protected areas of different guise. It even mentions the potential of a green infrastructure planning project. At this early stage it does seem rather disjointed especially when we need to avoid **inappropriate predatory development** into our pleasurable environment. Maybe now is the chance to pursue a policy to protect the Hoo Peninsula by pushing for **National Park Status** which on the face of it seems a way forward in protecting and developing a rare and historical area of national importance which in time would encourage more visitors onto the tourist trail.
- 31) Promoting the areas valued environment with possibly visual information display boards in public areas but more especially around the rural villages. Urban areas could have (if not already) changing information displays on bus information boards. At train stations a similar stance might be apt. Perhaps '**Medway Matters**' but still retaining its

usual information could have a makeover with likely finance coming from independent advertisers would help pay for production. There are many free advertising magazines which abound in and around North and East Kent which convey much article interest for everyone. Why not Medway?

32) No comment.

BUILD ENVIRONMENT

33) A very careful approach is required to prevent mistakes being made which could become costly for future generations. If riverside locations are to be developed they must reflect the importance of its **historic significance**. Building high-rise buildings along or close to the river foreshore hides one of the pleasurable things that attract visitors but unfortunately high-rise living has already happened at the Gillingham Pier area. Infrastructure must also be sound and safe reflecting the way folk wish to live.

34) Homes with gardens perhaps suit most families and are preferable but homes without gardens require **communal recreational space** even more so. Having convenient and easy access to points of socialising interest could be an advantage.

35) All areas within Medway especially those that fall into 'of historic value' must be protected but not necessarily reflected within new development. Some run-down areas call for **improvement and revitalisation** but not to the extent of extending low-density suburbs closer to the many rural and semi-rural villages that have their own identity and as such form part of Medway's historic legacy.

36) No comment.

37) Developments need a distinct character for folk to be comfortable with however some developments are just a compromise. Land is at a premium so developers tend to squeeze in as many dwellings on a site as it is feasibly possible without trying to displease the planning process. It has been observed that some new developments within Medway are already becoming worse for wear such as the low-rise properties with **wooden cladding** that are situated to the rear of 'the Ship and Trades' hostelry beside the Dockyard Outlet. Is it perhaps ironic that most Architects do not reside in the properties they design?

RURAL ISSUES

38) **Hoo Parish Council's Village Infrastructure** Audit has already provided much information as to why Hoo St Werburgh cannot at present effectively act as a service centre for the wider Hoo Peninsula as there are many concerns that need to be addressed especially banking and better post office services, transport facilities, community amenities and not forgetting police contact points.

39) Additional leisure facilities in and around the Deangate complex could possibly bring office, retail and service employment. Hoo Marina Park and its peripheral marine activities has the space to expand its employment provision but although privately owned there may be a need for some guidance in how to achieve such. Again Kingsnorth Business Park has the potential to expand and is going ahead with expansion at present on 'Plot 4'. The whole site has **'railway network access'** on its flank which for the site to be sustainable to transport needs there must be utilisation of every option open to it. On the wider aspect of the Peninsula alternative public transport provision must be made available. To compensate for the loss of jobs perhaps the site of the now non-operational Kingsnorth Power Station in conjunction with its German owners could be utilised for **other employment need**.

40) Access to services as already stated must either be with public transport or by private car. With the former, urban type public transport because of its operational limitations does not in some circumstances suit the rural area. The Hoo Peninsula as a rural remote area may benefit from a system similar to the **'Turkish Dolmus'** whereby a series of mini-buses could be utilised on a 'round-robin' single fare basis located/centred

in Hoo and used to access all areas of the Peninsula stopping and picking up on an ad-hoc basis. A small covered **transfer waiting area** in Hoo centre could possibly allow folk access to the normal public transport to the urban areas of Medway and beyond if required.

- 41) Areas of rural Medway have witnessed tremendous development during the last local plan period notwithstanding the Hoo Peninsula where it has seen more than its fair share. The parish of Hoo has always welcomed a **certain amount of infill** but not to the extent of what can only be classed as **development over-kill** as what is currently planned to the West and to the North of Hoo off the Peninsula Way (A228). Within rural villages certain types of infrastructure might well include nursing homes in addition to starter homes for young folk. These types of homes should unquestionably be prioritised to favour local residents.
- 42) Strategic and local needs being addressed within parish areas working towards Neighbourhood Plans with an aim to include a policy giving all parishes' comparable support is encouraged within the new plan.

INFRASTRUCTURE AND SERVICES

- 43) Not a change as such but an improvement on Medway's existing leisure services in particular the **Hoo Leisure Centre** is imperative because of its captive clientele. Whilst trying to create a healthier lifestyle choice any reduction or removal to this type of service would cause a **disservice** to those it facilitates.
- 44) Healthy food options and therefore food growing opportunities can be achieved by giving support and guidance to developers in creating **allotment facilities** especially on larger developments where 'garden' space is now generally at a premium.
- 45) Allotments can create a certain physical activity combined with in some cases enjoyable **social interaction**. Leisure centres can also provide physical activities for the older generation especially those which contain swimming pools and only if they are realistically priced and are welcoming.
- 46) Perhaps consideration could be given for **complementary healthcare facility provision** to the west of Medway as access to the Medway Maritime Hospital is time consuming for patients and visitors alike for those who are remotely placed to the west of rural Medway. The provision of a **cottage style Hospital** could perhaps alleviate those disadvantaged folk in remote rural areas by having a separate healthcare facility which can be easily accessed.

SOCIAL AND COMMUNITY INFRASTRUCTURE

- 47) Schools or school places ideally have to keep up with new communities as soon as they are created not after. In the case of rural communities (with the aid of section 106s or CIL) those **school places** should preferably be ring-fenced for local children to prevent excessive and cross-travelling.
- 48) Community centres or village halls create health and social well-being across many facets of the community and therefore financial contributions could be included as part of the section 106 or CIL agreement. Some schools are already well used for extra-curriculum use but those that do not could be **tailored for community and social facilities**. To take pressure off major hospitals surgeries there is a need to keep up with new communities with perhaps hours of activity increased and weekend working. As mentioned in '46' a **supplementary healthcare facility/hospital** could also take the pressure away from the 'A&E' at Medway Maritime.

OPEN SPACE

- 49) If rationalisation meant that green buffer zones shall be reduced allowing development encroachment onto our rural villages beyond their present 'envelopes then

preservation of those open spaces are paramount to the multiple benefits that they offer to the present incumbents of Medway.

- 50) The document mentions that Medway has a low level of provision of open space compared with adjacent council areas. To sustain the present level or to rise above, it must surely be addressed as a policy alongside of any housing growth.
- 51) No comment.
- 52) All new development sites can incorporate **on-site open spaces** if the will of the developer is strong enough. Reliance and therefore contributions into existing open space is always a cheaper option for a developer.
- 53) Management of open space provision can generally be a better option if controlled by the authority even though this would have a cost whereby standards would be met and delivered hopefully in the best interest of the community it serves. The mention of a multi-functional model of open space provision seems unclear at this stage but rationalising the open space estate suggests using vacant sites for housing developments?

SPORTS FACILITIES

- 54) All types of sport indoor or outdoor can be encouraged by extra provision either through **increased use of school facilities** and existing facilities or from S106 monies generated from new developments for new additional or enhanced amenities.
- 55) A larger capacity **new stadium for the Gills** would be an asset to the Medway Towns as the only major football club in the southeast so a new location would be ideal but is there an area big enough for it to locate to? Redevelopment of the site could possibly go somewhere in rejuvenating Gillingham Town centre.

NATURAL RESOURCES

- 56) Medway has had a rich history of agriculture especially fruit and arable farming. Land over the years has fallen foul of unwarranted development on Greenfield sites even though the present local plan policies tended to protect such areas. Enormous weight must be given to the **retention of high quality land around Medway** where it must be protected against needless and predatory development especially on the Hoo Peninsula particularly around our rural villages. Once this land is concreted over it is lost forever.

AIR QUALITY

- 57) The document mentions 3 AQMA's within Medway. **Monitoring of air quality** seems minimal in comparison with the size of Medway. There is concern that additional monitoring ought to occur in and around Medway with two areas coming to mind – the tunnel area on the Frindsbury side and in and around Strood town centre. Another area of concern would be in and around the congested Wainscott area (A228/A289) and Brompton Farm Road. Any increase to traffic in particular HGV's having access to the Hoo Peninsula due to the prospect of more development may also exacerbate levels of nitrogen dioxide along the A228 corridor.

MINERALS

- 58) There is no denying that Minerals are a finite resource and are recognised as such but if they are to be excavated then every effort must be made to either transport those minerals wherever possible by the rail network or by wharfage. The Hoo Peninsula although surrounded by water has **access to the railway network** whereby it ought to be utilised. Any planning applications submitted must be conditional in prioritising mineral movement away from the road network onto alternative transport if practicable.
- 59) Again wharves and their suchlike are paramount in their importance of receiving and transporting heavy aggregate. Maintenance of wharves ought to continue to have adequate access and must **not** be allowed to be run down. The more minerals we import

creates an importance in the upkeep and enhancement of existing infrastructure thus sustaining safe movement of those minerals to their destination.

WASTE

- 60) There seems to be a disparity between what Medway produces in household waste (120,000 tonnes – 2014) and what Medway handles in waste (650,000 tonnes – 2013). If this is the case **should Medway handle its own waste** therefore by processing its own waste that may perhaps go some way into reducing cross-border waste movements as the mention of an option in relocating waste transfer stations to the wider region is not a sustainable option. There would not be any mileage either in creating **a waste to energy** disposal facility as there are no guarantees that this 'Incinerator' would facilitate only Medway's waste.

SUSTAINABILITY AND CLIMATE CHANGE

- 61) Social sustainability has to start by giving access to services, something that has been an issue for some time. It is already mentioned that **access from the Hoo Peninsula** to Medway Hospital can be and generally is abysmal. Because of the time factor involved at present some folk are obliged to use private transport or Taxis. Both are expensive in their own way (Taxi fares or car-parking charges). Secondly a reliable broadband and mobile phone signal must also be available to all remote areas and not just for urban communities.
- 62) Inequalities exist not only in Medway but exist in other towns and other counties. Inequalities exist with crime levels but unfortunately the **level of visual policing** to tackle certain types of crime (anti-social behaviour) is governed by crime statistics. Employment also has its own inequalities as those folk who have easy access to faster transport (railway and commuter coaches) can often commute more easily and more quickly therefore obtaining access to better paid jobs.
- 63) There should be set standards with regard to **energy efficiency** whereby we agree that those standards could be reflected within planning applications on all new developments within the new plan.
- 64) We also agree to existing developments business or otherwise being encouraged to adapt to energy efficiency by way of useful and easily obtained information. Trees are a useful adaptation for heat loss so again support could be provided to obtain and grow. Everyone including children could be encouraged to **grow food at home** if a suitable space is available or if not obtaining where possible an allotment which could either be used solely or shared.
- 65) Again all new developments should be water friendly. Water is another finite commodity whereby new building regulations will be possibly imposed with regard to water usage. **Rainwater transfer facilities** as a matter of urgency must be incorporated not only on new sites but may well be encouraged on existing sites. Whether water metering is perhaps the best way forward in using less water the water utilities can and will increase the price of water as it suits but in practice does not generally restrict its use.

FLOOD RISK

- 66) There are many examples and in hindsight where SuDs have been incorporated on sites whereby some are adequate some are not but in general all drainage systems drain somewhere and with respect to the parish of Hoo that means the 'Brook'. Any increase to this natural drain has a potential for **flooding** elsewhere (downstream). All SuDs should be incorporated on new sites as conditional and not as an afterthought. It also mentioned flood defences on a site may create the risk of flooding elsewhere therefore certain areas at risk must be thoroughly investigated before any suggestion of development close to a flood plain or a flood risk area.

- 67) Certain areas in and around Medway must be identified, if not already as being at risk of flooding but within the Marsh areas of the Hoo Peninsula a compromise may have to be sought with regard to continually defending against flooding.

ENERGY

- 68) A substantial amount of productive agricultural land of Medway lies on or adjacent to the Hoo Peninsula. It would be foolish not to protect this once only asset by the **over-provision of wind farms**. Without subsidies wind farms are far less attractive. The now derelict River Medway's Islands could have potential for a wind farm lying just offshore between 'the Strand and Hoo Marina'.
- 69) Although Solar Farm technology is perhaps an alternative energy source it is also land hungry and as such cannot be afforded to dominate the Peninsula landscape. It deemed to be an attractive option but with Government subsidies now ending that now may be not so.
- 70) Taking advantage of waste heat from fossil fuel power stations is now history in relation to coal-fired Kingsnorth that only leaves gas-fired stations which have their limitations but whereby their waste heat perhaps could still be utilised to an advantage on small developments.

TRANSPORT

- 71) There are deficiencies in the transport network. At present bus services are without competition allowing one company to dictate. There perhaps is a possibility that the bus company could **create selected routes** to where its customers on the Peninsula desire to travel without having to interchange at Chatham? Those routes could include e.g. Hempstead Valley, Bluewater and more importantly Medway Hospital. Encouraging folk away from their vehicles only tends to alienate which gives an opposite response. To encourage people to use the towns firstly an alternative has to be applied, not less car-parking spaces with increased charges.
- 72) It could be considered to increase public transport usage and convenience that a flat fare be introduced and associated with an **Oyster Card type system** something that has already been suggested. Those folk living in the extremities of the rural areas because of longer journeys they have to endure would not therefore feel penalised.
- 73) More expansion within the towns potentially creates more vehicle miles. Those vehicles need reasonable car-parking but perhaps with more **park and ride facilities** particularly to the west of town as what was promised on the Medway City Estate may go somewhere in reducing this phenomenon.
- 74) There has always been concern with non-use of waterfront activities. There is mention within the document of a reported demand for **river usage** of which it is believed encouragement should be given.
- 75) The two **aviation facilities** mentioned are surely poles apart but can both play a major part for Medway one in leisure and the other in leisure and commercial. The latter at Rochester could be encouraged as part of the towns integrated transport system to allow e.g. business people an alternative for faster travel. The other at Stoke although confined could be expanded for social and domestic pleasure.

DELIVERABILITY

- 76) Surely local plan policies can only remain deliverable and sustainable if new development infrastructure conditions and requirements **are identified and made available** as soon as planning applications with associated Section 106 or CIL agreements are finalised. This should be a foresight and not a hindsight requirement.
- 77) The move to CIL on the face of it can possibly have an advantage rather than collective Section 106's only if that CIL is ringfenced to the local area especially within

rural remote areas. We have seen in the past **piecemeal infrastructure** from various housing developments proving to be abysmal and fortuitous and not accommodating the local needs as one would expect.

- 78) As mentioned nearly all infrastructure has to be recognised and prioritised before the event and not afterwards principally those areas which would affect the **wellbeing of the community** such as surgeries, expanded health and hospital facilities, sufficient school places, sports facilities all with the potential for adequate access and public transport.
- 79) Unlocking development potential should not alienate the need of **adequate planning process**. There ought **not** to be any shortcuts to the planning process however attractive a site may look to a prospective developer or to the planning authority. There is still a need for **public consultation** on most important planning applications especially controversial sites. **Public opinion** must be taken into consideration and the time factor for consultation ought not to be reduced just to ease and speed up the planning process.

DEVELOPMENT STRATEGY

- 80) There are five development principles mentioned in the document. The first may be difficult to achieve. In an ideal world the permeability idea is perhaps workable but not all people are mobile although to have a vehicle free neighbourhood in a shopping area is a wonderful notion if it can be achieved. Of course bus-stops should be well planned and therefore accessible to most people but private cars are still required to carry anything larger than a carrier-bag from high street facilities. High density housing could be considered futuristic and trendy and maybe a way forward but high-rise development is not the way forward as the 1960's witnessed. Firstly why not take advantage of all run-down **empty property space** above shops in High Streets and shopping areas. With a bit of encouragement and financial support empty spaces could be developed into small compact apartments.
- 81) Again the development type options are fine as long as people can see the advantage of **shopping and socialising** close to where they reside. Although it may be the will of the authority it is the developer with the purse-strings that has to be convinced not the people.
- 82) **Lodge Hill** is mentioned that it was central to the Medway's development strategy but during the consultation process it was made quite clear from overwhelming public response it was not the right development for that site. *If the site instead of being approved and then 'called in' had initially been compromised to accept a **smaller development** of say around 1000 dwellings but without its peripheral nonsense it is believed the site would have now been up and running and somewhere in achieving a useful asset for Medway to be proud of and would have therefore had the advantage of being close to larger existing free-standing settlements.* Having said that it is clearly mentioned that the Hoo Peninsula needs consideration to secure the sustainability of all of its historic rural settlements which as suggested must be included within the new plan. There is mention that growth is incremental whereby it can be more difficult to plan for improvements e.g. roads. The only access and egress to the Hoo Peninsula the **A228 at Four Elms Hill** has not seen any improvement since it was duelled even though many hundreds of dwellings have been allowed to develop over the last few years on the Peninsula and especially in Hoo. Even the 'Sharnal Street Bypass' was privately funded by business. **Four Elms Hill is the gateway to the Peninsula** and when it is closed (which is quite often) the Peninsula is closed to the outside world. With regard to accommodating a level of future growth making Hoo into more of a 'Market Town' rather than a village may be a step too far. Again it is mentioned that a larger scale of planned growth would come with improvements to existing facilities and provision of new – that did not really happen during the old plan and our members are sceptical with the suggestion that it will happen within the new plan. There is also much concern where it is mentioned 'there is scope for freestanding settlements on the Hoo Peninsula'. **We are incensed that**

there is seemingly a determination to create at any cost free-standing settlements within the countryside. Protection of the countryside is crucial in Medway's vision of the future.

- 83) Redevelopment of existing employment areas for residential use is a radical step. Those employment areas then have to be moved – where?
- 84) If anything the **green belt boundary** needs to be extended to protect the over-spill of urban areas otherwise towns and their villages will lose their identity entirely.
- 85) Building high-rise/density developments on the riverside creates a **loss of a riverside vista** which is the attraction for tourists. A riverside landscape is something we need to develop and maximise if we are to build a high quality, urban style of living.
- 86) Creating apartments in and around Chatham and the Waterfront is fine but there must not be a **tendency to over-develop** to the extreme by perhaps creating areas that may be regretful in the future.
- 87) Again town centres other than Chatham possibly need a **complete makeover** so they can become more attractive to the larger retailer with less emphasis on charity shops which abound. Again as mentioned all the towns have similar problems as with some areas there is much empty space above retailers that could be tidied up and utilised for accommodation.

<End>

Signed
Cllr Lionel Pearce for and on behalf of Hoo Parish Council