Hoo Saint Werburgh Parish Council

Parish Clerk: Mrs Sherrie Babington.

[redacted]

A response to the consultation document published by Medway Council.

Planning for Growth on The Hoo Peninsula.

Produced by

Hoo St Werburgh Parish Council

May 2020

A New Vision for Hoo St Werburgh.

The consultative document states that the expansion of the area and population will secure demand for new services such as transport links, education, health services and leisure facilities. Why should this have to happen in the future, when the existing population have been demanding this for years?

The lack of an approved Local Plan has led to a number of predatory large developments being approved and built, with no improvements in any services, particularly noticeable in transport and health facilities.

What will come first, transport, education and healthcare developments or the building of new homes in an area without the facilities to support them?

How can we be sure of the funding available by way of the "successful" HIF bid when there are a range of conditions to be met before the money is released? Why are Medway Council not prepared to release what these conditions are?

At the moment, approximately 70% of the working population of Hoo commute to employment outside of the area. It will require a large expansion of local employment opportunities to reverse this trend.

The consultation document quotes "The Local Plan is our strategy of how we will carefully manage the growth needed in order to achieve a more successful, attractive Medway". During the years that consultation on the new Local Plan has been proceeding the Hoo Peninsula has suffered and continues to suffer with the building of large housing developments, which have increased pressure upon local services, with little improvement in the provision of services and facilities, to a point where they are unable to cope with demand.

The approval of new developments must be stopped until these issues have been addressed.

OPPORTUNITITES AND CONSTRAINTS

Constraints

Whilst the constraints are correct in as far as they go, they miss several important observations.

The air pollution has become an increasing problem due to the heavy increase in commercial and private vehicles using the only access road, Four Elms Hill, to the housing and commercial premises of Hoo St Werburgh and the remainder of the Peninsula villages. Minor interruptions to the flow at the Four Elms roundabout or on Four Elms Hill quickly leads to traffic blocking the local roads and, in many cases, causing delays as far back as The Medway Tunnel, and the Wainscott Bye-pass. This situation is exaserbated by the increased flow of Heavy Goods Vehicles (HGV) to and from the new commercial developments at Kingsnorth Industrial Estate and the sand and gravel excavations by Tarmac.

Opportunities

The diagram in the Consultation Document illustrates the route of the improved rail services and the location of the new rail station, whilst it shows several proposed new roads, these do not lead to anywhere in particular. They appear to be new roads on new housing developments, but do not appear to assist traffic movement on and off the Peninsula. There is no indication of the route of the new access road for the Peninsula, just the general statement that a new access road could "take some of the burden off Four Elms".

Whilst the location of the new rail station is identified, there is no indication of the footprint required for this facility, or the need for public transport that will be required to enable people to make use of it. There will also be the need for a substantial car parking facility, for many people will not be prepared to complete a thirty-minute walk, in all weather and at all times of the year, to reach the station.

Will the general quality of life be improved through major development of the Peninsula? These developments will lead to a large reduction in the existing green spaces and countryside.

THE PROPOSED FUTURE DEVELOPMENT

There are a great number of key principles proposed throughout the development portion of this document. However, recent developments that have been approved show, that the people designing and building the developments will put financial gain as their principle priority. The reality will not meet the rhetoric.

Recent developments on the Peninsula show that there are in fact narrow roads choked with parked vehicles, as insufficient parking has been allowed for each dwelling. A single off-road parking space does not reflect the reality that there will be a requirement for two plus spaces for each dwelling, more for some of the larger, multi-bedroom homes. Evenings and weekends present access problems for both residents and emergency vehicles, as the roads are too narrow and residents have little choice but to park on each side of the road, often blocking footpath access.

The consultation document states that a key principle of the development will be "landscaped, preserving and improving the existing natural environment". This will require very careful and sympathetic planning and development, something which past and present developments do not illustrate. We are shown a large number of pictures which pertain to illustrate the future developments. None of these illustrate what is currently happening with the developments currently being built and those recently completed.

We are also told that the developments will be sympathetic to the Hoo skyline with using few three storey buildings, but we are then shown a large number of artistic impression views, all of which show wide roads and with few parked vehicles, but most featuring three storey developments.

We are promised that there will be better access around the area for walking, cycling and public transport. How will the population be encouraged to change from the private car when all statistics show increasing car use? It is easy to state that an improved bus service has the potential to reduce commuting to 5 out of 10 in the future, but with a population increase of 35,000 at the end of the plan, there will still be approximately a 12,000 increase in car journeys.

The plans for creating vibrant and sustainable neighbourhoods are very vague and contain no information of how this is to be achieved.

There is a large reliance on the new rail station encouraging opportunities for business expansion, leading to employment opportunities in the area. Previously the railway was not well used which resulted in the station being closed in 1962.

There needs to be more information on the development of the facilities to be provided, to include Health facilities (including Doctors, Dentists and Health Centres), Schools, both Primary and Secondary, Shopping Outlets, Leisure and Recreation. We need to know, where, when and how they will be provided.

One of the many concerns of the existing population of the Peninsula is that the Villages of Hoo, Chattenden, Deangate and High Halstow become a single town, with no breaks between them, and the whole area joins with Wainscott and Frindsbury to become part of Strood. Each area is proud of its identity and would wish to retain it. The final version of the new Local Plan will have to ensure that this development is restrained to prevent this from happening.

COMMENT

This is a very professional produced document, which provides an artistic enhanced description of the perfect place for people and their families to live. It bears little resemblance to the way in which recent developments have shaped the area. The document lacks facts. There is no recognition of the views of local people, strongly expressed in the past, that they have no wish for this level of development of the area in which they live.

There is no detail of how Medway Council will influence and control the large numbers of predatory developments which will be involved in a scheme of this magnitude, to achieve the vision set out in this consultative document.

It is obvious from recent developments that commercial priorities will overrule design intentions, where additional facilities, quality of materials and funding of infrastructure proposals and requirements are concerned.

The published brochure does not address the existing problems of Air Pollution, the development of the infrastructure maintaining pace with the building of the new properties, or the development of Health and Social Facilities required to service the existing population, and if this development should go ahead to service the needs of the population as it grows.

Hoo St Werburgh Parish Council opposes a development of this size and complexity for the Peninsula. We would request that Medway Council takes the opportunity to revisit and review the proposals for the Hoo Peninsula and produce a plan which better reflects the wishes of the local population.

Hoo Parish Council – Supplementary Response
The Planning for Growth on the Hoo Peninsula Consultation 2020
Medway Council's Local Plan

Page 1. Hoo Parish Council's response:

1.1 We object to Medway Council's emerging Local Plan and Development Strategy with the creation of a "Small Rural Town" around Hoo and Chattenden. We welcome the planning for our fair share of growth and development on the Hoo Peninsula, particularly around Hoo and Chattenden. We of course prefer long term local master planning compared to the vulnerability of inappropriate development, in order to plan for and to fund local services such as health, education, leisure and community.

Page 2. Hoo Parish Council's response:

2.1 We believe that Hoo can already today be described as a "thriving rural town" due to there once being a good balance between housing, infrastructure, and local services. However, due to recent inappropriate development, the balance is now "off" whereby the demand and strain on local services and infrastructure has increased because of such recent inappropriate development.

2.2 We recognise that today Hoo is a large semi-rural village due to its post war development, particularly the 1960s and 1970s. However, it can be argued that Hoo has managed to still maintain many of the qualities of a traditional small village such as a low crime rate, general peace and tranquility outside of rush hour (AM and PM), agricultural surroundings, some historic buildings, a small vibrant high street, community fabric/spirit, sense of knowing many other residents and a connection to the land (farming, horses, fishing etc.).

2.3 Recent inappropriate development was seen as threatening to these local qualities unless the general consensus of new residents moving into Hoo was to enjoy and enhance these qualities. There is a chance for any unbalance to be corrected or improved but what Medway Council is proposing, over 12,000 homes and a "Small Rural Town", will result in a fundamental cultural change in Hoo which could negatively impact the qualities, mentioned above, beyond repair.

2.4 We do not want Hoo to become characterless and non-entity urban sprawl which mirrors local settlements and towns in the area. In terms of "thriving" as described by Medway Council, Hoo needs to also retain an identity and a sense of place. Hoo cannot simply just be a piece of urban settlement that forms a larger entity, the Medway Towns, and be overlooked.

2.5. We recognise that homes, jobs, and services must be built but be provided in the right and most suitable places. We believe that Medway Council's Development Strategy of concentrating a vast amount of greenfield development around Hoo and Chattenden, turning Hoo and Chattenden into a "Small Rural Town", is not justified. However, there are potential brownfield development sites in Hoo and Chattenden such as the footprint of the former Chattenden Barracks (500 homes).

2.6 We are not "Nimbys", we are happy for the local community to take its fair share of housing to meet local demand as long as this is fairly dispersed on the best and most suitable sites across the Medway Towns. Because of recent inappropriate development in Hoo and Chattenden, we are advocating that other settlements and communities in the Medway Towns now also take their fair share where there is enough available and potential greenfield development capacity.

2.7 We believe that there should be a legal mechanism and organisation, with every local new development, for allocating affordable housing (rent and shared ownership) with a preference for local Hoo residents and particularly young people.

2.8 We recognise that there is potential for expanding job opportunities locally at Kingsnorth Industrial Estate. We have always supported job creating commercial development in this area as long as proper mitigation is in place, such as an adequate lorry park and facilities for drivers of lorries. Commercial development away from the main settlement of Hoo, if done correctly, does not undermine the local qualities of Hoo mentioned above.

2.9 We believe that local services, particularly health and education, are under increased pressure due to national circumstances as well as increases in local development recently. We expect a dramatic increase in local services provision to facilitate a "Small Rural Town" and 12,000 new homes as well as current residents. Increases in provision should not simply facilitate new homes but also aim to improve the quality of live for current residents and the current community. There needs to be a visible, long lasting, and obvious range of benefits to existing residents from the building of 12,000 homes in the local community.

2.10 We believe that Hoo already has a vibrant local community and already has the capacity to improve on this. We do not want to see Hoo simply turn into a dormitory settlement where its only purpose is to house people. There is potential for a moderate tourism and leisure industry in Hoo, giving the place an identity other than being just a settlement. This identity would recognise the history of Hoo including industry, military, engineering, environment, and art.

2.11 We recognise that the transport mix in Hoo is too heavily reliant on private car transport. However, because of the semi-rural location of Hoo, it would naturally be the case that private car usage would be a higher than average. Hoo already benefits from a moderately frequent bus service, although this is mostly interrupted by the amount of traffic on local roads (private cars). There should be improvements to bus provision now regardless of planned development, to ease congestion and to improve air quality, especially on Four Elms Hill (AQMA). Hoo already benefits from a good commuter coach service which depends on the capacity of local roads.

2.12 We believe that it is unrealistic that Medway Council's Planning Department wishes to introduce a new passenger railway branch line onto the Hoo Peninsula. At present, local commuters drive to Higham or Strood train station, park and then catch a direct train to London. Or, they make use of the local commuter coach service in Hoo itself. We believe there are better and more cost-effective ways of improving local railway provision for Hoo residents. This includes increasing bus provision to transport residents to existing train stations on direct railway lines, as well as increasing parking provision at such train stations and improving road capacity to handle increases in traffic. We believe this is a more realistic, viable, sustainable, and achievable local transport strategy.

2.13 We hope that Medway Council's Planning Department respects the past of Hoo in terms of protecting and enhancing local heritage, creating tourism opportunities, and adding to a sense of identity for Hoo. This includes securing and protecting listed buildings and community assets with heritage value. As well as reinstating architectural heritage, character, attractive historic street furniture and historic items which adds general attractiveness to the public realm in Hoo.

2.14 We do believe that Hoo can be a sustainable settlement for the future (without major housing development) with the improvement of existing local services as well as providing affordable housing for local people in the right location. Taking into account that Hoo itself has already absorbed its fair share of housing and all settlements in the Medway Towns need to do the same.

2.15 We are sceptical of the claim that expanding Hoo and Chattenden with the building of over 12,000 homes in the area will result in significant opportunities and benefits to the existing local community. We are concerned that any increase in infrastructure and local service provision will simply just aim to accommodate the building of 12,000 additional homes, and therefore there will not be any real increase in opportunities or benefits for existing local residents.

2.16 The building of over 12,000 homes and a new "Small Rural Town" around Hoo and Chattenden, with the required infrastructure and services, is equivalent to building a new settlement from scratch, such as Ebbsfleet Valley with around 15,000 homes (coordinated by the Ebbsfleet Development Corporation). We are sceptical that Medway Council's Planning Department has the means on its own to plan for and to enforce such a large scale and major housing project.

2.17 We are sceptical of the idea that there will be enough local demand, now and in the future, for a new passenger rail station and the use of a railway branch line on the Hoo Peninsula. Medway Council admits that the development of over 12,000 homes will take over twenty years to complete, we believe that there will not be the demand for such a new passenger rail station and railway branch line between year one and year twenty or more. We object to the potential idea of Medway Council, and local taxpayers, propping up and subsidising an unsustainable and unviable new passenger rail station, and railway branch line, until such a new service "breaks-even". It could be the case that if such a new service is allowed to go ahead, Medway Council and local tax payers could be propping up and subsidising the service for decades, way beyond the twenty-year period of building 12,000 or more homes.

2.18 We are sceptical that the capital cost of such a new service will remain within the allocated Housing Infrastructure Fund, and therefore it will be Medway Council and local taxpayers who would have to pay for and subsidise any financial overruns. The fact that there are these financial risks supports the argument that the proposed new service is unsustainable and unviable.

2.19 We accept that the only real viable improvements to transport infrastructure are upgraded roads and new roads to accommodate development. We believe that Medway Council's Planning Department's proposals could be more plausible if they stuck to road-based transport improvements. However, we understand that there has to be a "transport mix" including sustainable transport options in order to build the scale of housing which Medway Council's Planning Department is proposing. Because we believe that the railway option is unrealistic, this furthers our case that Medway Council's Development Strategy for the Hoo Peninsula is not sound or justified and should be scrapped.

2.20 We believe that Medway Council's Planning Department should look at improving and upgrading existing roads on the Hoo Peninsula, many of which are not currently maintained to a high standard. This includes roads such as Upchat Road and Upnor Road (heading from the Hoo Peninsula Towards the Medway Tunnel) and Dux Court Road, Cooling Road, Main Road Cooling, Town Road and the B2000 (heading off the Hoo Peninsula via High Halstow, Cooling and Cliffe/Cliffe Woods). By maintaining these roads at a good standard, and upgrading them in places, this would ease current congestion problems as well as to allow for some sustainable development - without the need to spend hundreds of millions of taxpayers' money on an unviable and unrealistic new passenger rail service.

2.21 We welcome the idea of improving the pedestrian and cycling network on the Hoo Peninsula. We believe that this can be achieved at a good quality level without the scale of development being proposed, the building of over 12,000 homes. In fact, in order to reduce traffic congestion now rather than in the future, Medway Council should already be investing in pedestrian, cycling and bus provision already.

2.22 We believe that the claim by Medway Council's Planning Department of "enhanced green and public open spaces that are easily accessible" is ironic when the department has already allowed the development of a large sports club with sizeable sports fields in Hoo (the former Peninsula Club) in a good accessible location, as well as the development of a large sports field in Chattenden (the former Arethusa sports field) also in a good accessible location. Medway Council's Planning Department will now be in a position to try and find suitable land to turn into green and public open space, including sports provision. This may cost considerably more than if the sites mentioned above were protected in the first place, taking into account their more central location.

2.23 We hope that Medway Council's Planning Department ensures that the proportion of green space to housing is maintained at a high degree and that the lost green space mentioned previously is compensated to the community by allocating the same acreage in a good location. With the building of 12,000 or more homes, we are concerned that a desirable proportion of green space to housing will not be maintained.

2.24 We welcome the view by Medway Council's Planning Department that they want to try and improve the overall quality of life for local residents (current and future), particularly health and education. Medway Council's Planning Department should recognise that the building of over 12,000 homes around Hoo & Chattenden poses a huge risk of fundamental change in our community as well as a rapid decrease in quality of life due to natural strains on local health services and education services (if they fail to keep up with the scale of development). Because of the lack of "joined up thinking" being demonstrated by the fragmented system and autonomy of health and education providers, we are not convinced that Medway Council's Planning Departments claims of improvements to quality of life are realistic and will actually come to be.

2.25 We believe that it is unacceptable for there to be in a sense of a gamble with regards to Medway Council's Planning Department hoping that service providers will keep up with the development of over 12,000 homes. Medway Council's Planning Department cannot guarantee that the overall quality of life for local residents (current and future) will improve as they have no control of or jurisdiction with some service providers such as health and education. This is why we believe that a dispersed greenfield Development Strategy, across the whole of the Medway Towns on the best possible sites (closest to existing infrastructure), will ensure that individual communities are better placed to accommodate and absorb additional housing, overall ensuring that this alternative Development Strategy is more sustainable than the current one being proposed.

2.26 We welcome the idea that any development in Hoo and Chattenden should be landscape led. This is welcomed because of the semi-rural character of the local community, including the current local qualities mentioned previously and the local impression and view that Hoo does maintain a village identity despite its large size. We support the view that any development site in the community should have a large proportion of green open space for the public's benefit, but also to maintain and improve the attractiveness and character of the settlement overall. We believe that improvements to the overall landscape attractiveness of Hoo and Chattenden can be achieved regardless of the proposals.

2.27 We recognise that there does need to be improvements to pedestrian and cycling access between communities on the Hoo Peninsula. For example, there is not adequate surfaced footpath access between Hoo and Stoke or Hoo and High Halstow. The roads between settlements on the Hoo Peninsula are also very poor, even for a semi-rural location. For example, between Hoo and High Halstow there is Dux Court Road which can only be described as appalling and unsafe. We believe that simple and substantially lower cost solutions can be found to rectify these problems without the requirement to build over 12,000 homes on the Hoo Peninsula and the £170m of Housing Infrastructure Funding.

2.28 We believe that Medway Council should already be investing in local pedestrian, cycling and bus network connectivity in order to reduce local traffic congestion and encourage more residents to use the private car less or not at all. There has already been a number of new developments built in recent years around Hoo and Chattenden, which of course will raise additional council tax income for the authority. Funding which should be reinvested into the local community such as improving pedestrian, cycling and bus network connectivity.

2.29 We believe that Hoo and Chattenden are already a vibrant local community with capacity to improve. Because of recent house building in Hoo and Chattenden the "sustainability balance" between homes, local services and infrastructure is "off". However, we believe that this can be put right over time without the need to build a "Small Rural Town". We welcome that new housing

should be an attractive and tailored build form for any new development in our local community. Any such new development must "blend in" well with the surrounding settlement envelope.

2.30 We recognise that there is a property mix in Hoo and Chattenden which is varied in terms of different architecture from different periods in time. However, we believe that this situation should not allow for a "free for all" in terms of relaxed design and "anything goes". We believe that local housing design should aim to improve the overall look of the area, respecting our semi-rural location, and it should even try to reinstate lost or desired former architectural design which is suitable to the history of Hoo and Chattenden.

2.31 We accept that any new housing or development has to be built for the future in terms of catering for need. We believe that Medway Council's Planning Department's capacity to reflect on or protect Hoo and Chattenden's past and rural character will be an afterthought and will not be a high enough priority when the authority "opens the floodgates" to developers and gives them the green light to start mass housing development.

2.32 We do not believe that concentrating the building of over 12,000 homes on the Hoo Peninsula which consists of only one major road on and off, which is already a AQMA because of the pollution generated from such a road already, will constitute sustainable development which addresses climate change.

2.33 We do not believe that Medway Council already well maintains the natural landscape around Hoo and Chattenden, which could already have its accessibility improved now if Medway Council wanted to. Hoo Parish Council does not believe that Medway Council will all of a sudden start to maintain the natural landscape to a decent standard just because there would be 12,000 homes built on the Hoo Peninsula.

2.34 We believe that Medway Council's Planning Department is misguided to believe that local residents (present and future) will have suitable access to local services and facilities (present and future) in order to not need to travel into other settlements (such as Strood or the rest of the Medway Towns). Medway Council's Planning Department cannot guarantee that local service provision will "keep up" with house building around Hoo and Chattenden. Therefore, there is a risk of overall sustainability not being achieved and a situation where the building of a "Small Rural Town" will add huge strain to services and infrastructure in nearby settlements such as Strood, because local residents will have to travel. Medway Council's Planning Department needs to demonstrate where there is "joined up planning" with services such as health and education providers showing that they can "keep up" with demand as house building commences. We believe that Medway Council's Planning Department does not have this reassurance or "joined up planning" with local service providers.

2.35 We believe that Medway Council's Planning Department's plans for a new passenger rail service, which is a railway branch line, is not a credible option. The proposed railway branch line is not sustainable or financially viable and Medway Council's Planning Department should instead consider a transport infrastructure alternative, such a road, or even more credible, completely change their Development Strategy and come up with a more viable and sustainable plan.

2.36 We welcome the creation of a community hub and a new or expanded business centre at Kingsnorth Industrial Estate, which can be achieved already regardless of the proposals.

2.37 Medway Council's Planning Department's claim of a "direct access to London", in terms of a new passenger rail service, is not realistic. The fact is that what Medway Council's Planning Department is proposing is a railway branch line which is attached to a railway main line. We do not believe it is sustainable or viable to run a direct passenger railway service from the Hoo Peninsula into London when such a direct railway service already exists on the railway main lines through the Medway Towns. This is why Medway Council's Planning Department's Development Strategy of not developing land close to the existing railway main lines, across the Medway Towns, is misguided.

2.38 What is concerning is the suggestion by Medway Council's Planning Department that local residents in Hoo and Chattenden, present and future, will get the train into the rest of the Medway Towns. We cannot see any evidence that present local residents will use the proposed passenger rail service either into London or into the rest of the Medway Towns, has Medway Council's Planning Department surveyed local residents?

2.39 We believe that local residents already have the ability to work from home using technology and that with the upgrading and small expansion of Kingsnorth Industrial Estate, working physically closer to home can be achieved already regardless of the proposals. We believe that Hoo and Chattenden is already a sought after place to live and work and welcome the idea of thoughtfully designed homes and neighbourhoods with attractive streets and public spaces, all of which can be achieved already by Medway Council.

Page 3. Hoo Parish Council's response:

3.1 We welcome any new development being set and well designed in a rural character. We welcome a decent network of local parks with sustainable urban drainage systems (SUDS), which also have local wildlife benefits. Because of the local topography, and particularly our heavy clay soil composition, Hoo and Chattenden does suffer from surface water problems and is especially prone to flash flooding in certain lowland areas. We welcome the maintenance and upgrading of existing public spaces for community events and gatherings, as well as the creation of new areas as long as they are maintained to a high standard also.

3.2 We welcome new vibrant and walkable neighbourhood centres and the improvements and upgrading of existing ones. We welcome the improvements to existing transport, particularly local bus services and the general improvements and basic maintenance of existing roads. We believe that Medway Council's Planning Department should concentrate on more realistic and viable transport methods such as the improvements to local bus provision, commuter coach provision and local roads. We welcome the improvement to existing green infrastructure and existing footpaths which should already be maintained to a high standard.

3.3 We welcome the provision of high quality, strong character and well built homes on any development site within the local community. We are sceptical of how Medway Council's Planning Department will enforce such high quality when we believe their track record so far has been poor in terms of existing and recent development sites. We welcome many of the measures mentioned above, all of which can be implemented now. We do not believe that Medway Council's Planning Department will suddenly change their standards and quality of service overnight with the building of 12,000 homes on the Hoo Peninsula, therefore we are sceptical of such claims.

Page 4 and Page 5. Hoo Parish Council's response:

4/5.1 We do not accept Medway Council's Planning Department's claim than there is a challenge with finding land for housing. We have identified over 500 hectares of available greenfield development sites, outside of Hoo and Chattenden, which would provide for over 15,000 homes. Meaning that the development of Hoo and Chattenden into a "Small Rural Town" is completely avoidable, especially as these identified more suitable sites are a reasonable alternative collectively.

4/5.2 We will be presenting our own assessment of potential development sites and an alternative Development Strategy to that of a "Small Rural Town" around Hoo and Chattenden. This alternative Development Strategy will identify the most appropriate development sites, many of which are close to existing infrastructure which can be upgraded or have its capacity increased. For example, development sites in North Rainham which are present right next to an existing railway main line (with direct access to London).

4/5.3 We believe that Medway Council's Planning Department has been too ambitious with regards to the proposed transport mix infrastructure with the creation of a "Small Rural Town" around Hoo and Chattenden. Particularly the attempt to introduce a new passenger rail service onto the Hoo Peninsula which is the fundamental flaw to the sustainability of their Development Strategy and the creation of a "Small Rural Town" with over 12,000 homes.

4/5.4 We believe that Medway Council's Planning Department's current plans would be a lot more credible if they removed their unrealistic proposed new passenger rail service on the Hoo Peninsula. Medway Council's Planning Department could instead increase further the road transport infrastructure out onto the Hoo Peninsula. However, we understand that in order to produce sustainable development on the scale of what Medway Council's Planning Department has proposed on the Hoo Peninsula, you have to have a mix of sustainable transport infrastructure (rail, bus, coach, taxi, shared car etc.). Therefore, as the proposed new passenger rail service is not viable or sustainable, Medway Council's Planning Department should scrap and re-think their entire Development Strategy and move away from the proposed "Small Rural Town" around Hoo and Chattenden. The scale of development proposed for Hoo and Chattenden, and the rest of the Hoo Peninsula, is unsustainable.

4/5.5 We support Medway Council's Planning Department's vision that the main focus of a Development Strategy should be the regeneration of urban waterfronts and town centres as a priority. We also support the view that Medway Council's Planning Department does need to look more widely across the whole of the Medway Towns to find potential development land. This includes areas such as North Rainham, East Rainham, Capstone Valley and Hempstead. We do not believe that Medway Council's Planning Department is seriously considering potential development in these areas and therefore they only propose the creation of a "Small Rural Town" in Hoo and Chattenden.

4/5.6 We do not believe that Medway Council's Planning Department is fully following the guidance set out in the NPPF. Guidance which states that sustainable development can also be achieved across a range of sites, that are the most suitable to develop, which are attached to existing villages and towns, supported by suitable infrastructure. The former Independent Examiner, Laura Graham, confirmed this and hinted that Medway Council's Planning Department should move away from a single site mass housing project ("Small Rural Town"). Medway Council's Planning Department has not learnt the lessons from Lodge Hill.

4/5.7 We recognise that the Hoo Peninsula can only sustain small increases in incremental development on the most suitable development sites. The scale of development currently being proposed by Medway Council's Planning Department is unsustainable and unviable. We welcome that Medway Council's Planning Department recognises that the Hoo Peninsula is a distinctive place which is an important area for wildlife as a whole. As well as very limited services and infrastructure with only a small capacity for any potential growth.

4/5.8 We welcome that Medway Council's Planning Department recognises that there would need to be a substantial and significant upgrades to transport to facilitate any major development in order for it to be sustainable. We believe that Medway Council's Planning Department does not recognise that there is only so much transport infrastructure on the Hoo Peninsula that you can upgrade or improve before the proposals become unviable and unsustainable. Therefore, the capacity for housing development on the Hoo Peninsula is fundamentally limited.

4/5.9 Even though that Medway Council's Planning Department's Housing Infrastructure Bid has been initially successful, we understand that there are many complicated obstacles and conditions that Medway Council's Planning Department need to meet in order for any of the proposals and funding to come to fruition. Medway Council's Planning Department's Local Plan and Development Strategy can be ultimately "thrown out" by the Independent Examiner, this would also "throw out" the Housing Infrastructure Fund bid and proposals. The Housing Infrastructure Fund does not predetermine the outcome of the Independent Examination and in fact, Medway Council's Planning Department is at

fundamental risk of wasting taxpayers' money on such proposals which may not be formally signed off in the end.

4/5.10 The suggestion by Medway Council's Planning Department that the infrastructure improvements, both rail and road, will be in place by 2024 is not credible**.** We believe that what reduces even further the credibility, viability, and sustainability of a new passenger rail service on the Hoo Peninsula is the location of the proposed new railway station. The proposed new railway station is on the outskirts of the new settlement to the East which means that users of such a new railway station are most likely to drive from residence in the West all the way through the "Small Rural Town" in order to park up and use such a new railway station.

4/5.11 We are not convinced that residents, present and future, will use sustainable transport methods (pedestrian, cycle, bus, taxi etc.) if they live more than 10 minutes walk to such a new railway station. Train stations normally are found in the centre of a settlement and what Medway Council's Planning Department is proposing is not the norm, which discredits their theory that the majority of local residents, present and future, will simply walk, cycle or use busses to get to the proposed new train station.

4/5.12 We believe that it is unrealistic for Medway Council's Planning Department to suggest that local residents, present and future, will use the train from Sharnal Street to travel to Strood or any of the other Medway Towns. It is also unrealistic to suggest that such a new passenger rail service would be viable and be able to provide direct passenger services to London without changeovers at Gravesend etc., especially as the new passenger rail service would be operating from a railway branch line (and not a railway main line). There is also the unjustified physical interruption to consider, from a railway branch line, of the railway main line caused by Medway Council's Planning Department's proposals.

4/5.13 We welcome the proposals to increase capacity on the local road network and to improve road transport in general. We believe that this is the only realistic and viable transport option for Medway Council's Planning Department to consider. Such improvements to road transport could facilitate increases in bus, commuter coach, pedestrian and cycling provision and capacity. It would also be more realistic to upgrade the existing train stations of Strood and Higham, such as increasing car parking capacity, in order to facilitate some development on the Hoo Peninsula. This is because at present, many local residents drive to these train stations, park, and then board direct train services to London.

4/5.14 We believe that with the building over 12,00 homes on the Hoo Peninsula, the problems with the AQMA will get worse and we could even see the extension of the management area itself because of increases in local pollution. There could even be the creation of new AQMA's on the Hoo Peninsula due to the bottleneck effect on local road infrastructure, even with the upgrading of local roads and increases in capacity due to the shire volume and increases in traffic.

4/5.15 We welcome the improvements to local green infrastructure including the creation of new green spaces, accessibility, allotments, parks, playgrounds, the planting of thousands of new native trees and hedgerows and the creation of fruit orchards. We believe that a suitable level of these measures can be achieved without the need to build over 12,000 homes.

4/5.16 We welcome the improvements to existing and the creation of new cycling and walking routes around Hoo and Chattenden, of which can be introduced now. We believe that Medway Council's Planning Department has no credibility with their claim that they would provide new sports pitches due to the fact that they have allowed development recently on a number of sports pitches in Hoo and Chattenden.

4/5.17 We cannot see how suddenly Medway Council's Planning Department will start to deliver such green infrastructure measures when they have not done so previously even with recent local

incremental development. Medway Council's Planning Department's suggestion of a "green pedestrian bridge" shows that the authority is being unrealistic**.** This type of ecological and green ambition by Medway Council's Planning Department is not consistent with their local track record, which includes the destruction of sports pitches, woodland, hedgerows, and trees etc.

4/5.18 Medway Council's Planning Department's idea of creating new wetlands, close to the River Medway, is a more realistic green infrastructure prospect, due to the existing local topography. We welcome this prospect due to the positive impact it would have on the local environment and wildlife, due to wetlands being very rich in biodiversity and a means of absorbing carbon. The Hoo Peninsula is well known for its wetlands and its wildlife habitat, particularly for birds. However, we are sceptical to believe that such improvements will be in place by 2024.

Page 6. Hoo Parish Council's response:

6.1 We welcome Medway Council's Planning Department's view that public transport, predominately busses, on the Hoo Peninsula is infrequent, underused, and generally poor and as such this leads to traffic congestion, poorer air quality, pollution and AQMA's as a result. We believe that its already within Medway Council's powers to improve such bus provision on the Hoo Peninsula if they really wanted to.

6.2 We believe that Medway Council has already failed with their promises of improving Four Elms Roundabout and Foul Elms Hill. There was supposed to be millions of pounds spent on improving this area of the road network already, regardless of the emerging Local Plan and Development Strategy, or the Housing Infrastructure Fund. These improvements were to facilitate development in Hoo and Chattenden which has already happened recently or is in the pipeline to be built.

6.3 We welcome Medway Council's Planning Department's view that the existing pedestrian and cycling network is fractured in many places across the Hoo Peninsula. However, it is already within Medway Council's power to improve and upgrade this provision which they have failed to do so. We welcome Medway Council's Planning Department's view that Peninsula Way requires multiple safe crossings as it is a very dangerous and busy road, particularly for walkers and cyclists who wish to access Deangate Recreation Ground via Dux Court Road (which is also a very dangerous road). However, again, it is already within Medway Council's power to ensure that roads are safe for pedestrians and cyclists. Medway Council has failed to introduce significant safety infrastructure so far on dangerous and busy roads on the Hoo Peninsula. We are not confident that Medway Council's Planning Department will actually deliver such infrastructure improvements.

6.4 We believe that Lodge Hill should be utilised and turned into a country park (Hoo Country Park), incorporating the former Deangate Golf Club site as well. Such a country park could be one of the best and largest in the South East, and a rival to Kent County Council's Shorne Woods Country Park. We would of thought that Medway Council's Planning Department would see this as a fantastic opportunity for Medway Council. We believe that improvements to provision mentioned above and a Hoo Country Park (Lodge Hill and Deangate Golf Club) can be achieved already. So far Medway Council has not done the most within its power to improve such provisions already on the Hoo Peninsula.

6.5 We welcome Medway Council's Planning Department's view that SSSI sites should restrict nearby development. We believe that Medway Council's Planning Department has not considered the impact on all local SSSI sites by the proposals.

6.6 We believe that the centre of Hoo does have the capacity to provide key services and employment opportunities to the existing population. However, the building of over 12,000 homes on the Hoo Peninsula would not be sustainable for just the centre of Hoo to try and cater for key services or employment opportunities.

6.7 We accept that the A228 is a physical divider which needs to have safety improvements (for pedestrians and cyclists) made anyway regardless of the proposed "Small Rural Town" around Hoo and Chattenden.

6.8 We believe that Medway Council's Planning Department has not contemplated that the building of a train station, car park, facilities, homes and a hub at Shanal Street would have to result in the complete movement and redesign of overhead power line cables across the whole of the Hoo Peninsula, something National Grid may not be in favour of. There are also significant high pressure fuel pipes running underground close by to the proposed train station site. We believe the location of the proposed train station is also not realistic.

Page 7. Hoo Parish Council's response:

7.1 We will only support development and the creation of a new neighbourhood centre in Chattenden, as part of the development of the former Chattenden Barracks (500 homes). Such a new neighbourhood would need to include shops, a doctor surgery (to serve Chattenden), a pharmacy, an upgraded community centre, an additional primary school, a sports field, play parks, allotments and a public centre. As well as new bus links and provision, and adequate pedestrian and cycling links and provision.

7.2 We recognise that Chattenden lacks its own neighbourhood centre which could provide services for its own community, reducing demand on Hoo and the need to travel into Hoo to access services. We believe this can all be achieved already regardless of the proposals. We also support the idea of an improved pedestrian and cycling crossing at the top of the dangerous and busy Four Elms Hill in order the safely link South Chattenden and North Chattenden together. Again, we believe this can be achieved already.

7.3 We recognise that the communities of South Chattenden and North Chattenden feel separate and distant and there should be measures and facilities put in place to correct this in order to create a united, well designed and single community of Chattenden. We would support incremental development in North Chattenden if this meant that new services for Chattenden could be created and a new a road could be built to link up Main Road Roundabout to Kitchener Roundabout (outside the former Chattenden Barracks). This would be supported regardless of Medway Council's Planning Department's plans for a "Small Rural Town" around Hoo and Chattenden. We believe that this simple linking of roads would facilitate a diversion and increase general capacity (via Cliffe Woods and via Upnor) if Four Elms Hill was blocked due to an accident or slowed due to congestion. This is without the need for a major relief road and junction being proposed as part of the Housing Infrastructure Fund.

7.4 We believe that the roads surrounding the former Chattenden Barracks (such as Woodfield Way and Upchat Road) should be adopted and maintained by Medway Council anyway. We believe that additional housing in Chattenden can constitute sustainable development with the original proposals and funding (not the HIF) to upgrade infrastructure at Four Elms Roundabout and Four Elms Hill as well as new service provision mentioned above.

7.5 We believe that the settlements of Hoo and Chattenden should remain separate and continue to be identified as such. We are sceptical based on Medway Council's Planning Department's proposals that this separation will be maintained and protected. We are not convinced that Medway Council's Planning Department will put in place measures and legal or environmental protections to enforce such a separation in order to prevent development in the future from undermining such "gaps" between Hoo and Chattenden.

7.6 We believe that Medway Council's Planning Department made a crucial error with regards to allowing development on the former Arethusa sports field, in South Chattenden, when Chattenden itself lacks such sports facilities and pitches. We fundamentally believe that the community of Hoo

has already absorbed its fair share of housing development, for natural growth and some external demand, for the foreseeable future. We recognise that there is capacity in Chattenden for some housing development (particularly the former Chattenden Barracks with 500 homes) in order to allow for the creation of a neighbourhood and local services specifically for Chattenden. Apart from this, we believe that Medway Council's Planning Department's Development Strategy should instead consist of dispersed greenfield development across the whole of the Medway Towns, developing the best sites which are closest to existing infrastructure, such as major motorways and railway main lines, which can be upgraded or capacity increased (sites in North Rainham, East Rainham, Capstone Valley and Hempstead).

7.7 We welcome the idea of upgrading local roads for vehicles and bicycles and the enhancement of local bus services and infrastructure. We believe that some improvements to these can be made now. Medway Council's Planning Department's proposals for a new relief road is the only credible part of their transport infrastructure plan.

7.8 We welcome Medway Council's Planning Department's view that there needs to be a reduction in the volume of traffic using Four Elms Hill and Four Elms Roundabout. This can be achieved with more viable transport infrastructure such as upgrading existing roads as well as increasing bus and commuter coach provision, and, the upgrading and provision of pedestrian and cycling networks. Medway Council also needs to get on with already secured improvements to Four Elms Hill and Four Elms Roundabout which have not come to fruition yet, this is regardless of the Housing Infrastructure Fund proposals. Medway Council's Planning Department cannot guarantee that the general quality of life for existing residents will be greatly improved, taking into account that there is no evidence of "joined up planning" and thinking with local service providers such as health and education.

7.9 We welcome the view that the local pedestrian experience needs to be improved in terms of access and a network of connectivity, as well as the creation of additional green spaces such as parks. We believe that improvements to these can be achieved already. We do not believe that existing local green space for wildlife and people is at its full potential. Medway Council has not invested in and made the most of existing green spaces to date and we are not confident that this will all of a sudden change. They have instead undermined and allowed development on key and potential green space sites around Hoo and Chattenden.

7.10 We recognise that Hoo and Chattenden has a mixed housing design but we believe that this should not allow for a housing design “free for all” with new housing developments. We believe that there should be an attractive and heritage led housing design standard for Hoo and Chattenden and this can be achieved already. Medway Council’s Planning Department has recently allowed out of keeping housing designs on new developments in Hoo and Chattenden. We are not confident that Medway Council’s Planning Department will all of a sudden start to properly plan for and administrate a desired housing design for Hoo and Chattenden.

7.11 We welcome the view that walking and cycling routes should be identified or enhanced. However, we believe that Medway Council should already be identifying and enhancing walking and cycling routes around Hoo and Chattenden as well as across the Hoo Peninsula. We believe that improvements to walking and cycling provision can be achieved already. We welcome the view that improvements should be made to blue infrastructure locally such as the expansion of wetlands and biodiversity. We believe that Medway Council should already be making improvements to blue infrastructure and biodiversity now. We are not confident that Medway Council will all of a sudden start to invest in and improve local blue infrastructure and biodiversity.

Page 8. Hoo Parish Council's response:

8.1 Our full response to these statements are outlined in detail previously, see pages 1 to 6 of this report concerning page 2 of the consultation presentation. We support any development being landscape led. This is should respect the semi-rural location of Hoo and Chattenden and also look to

enhance the overall appearance and feel of the two settlements. However, Medway Council's Planning Department should already be applying landscape led design to any new development in Hoo and Chattenden, regardless of the proposals.

8.2 We welcome sustainable access and movement including improvements to road, bus, coach, cycling and walking provision. However, we do not believe that the proposed new passenger rail service is viable or sustainable and therefore the scale of Medway Council's Planning Department's proposals are overall unviable and unsustainable. We believe that some improvements to access and movement across the Hoo Peninsula can be made now.

8.3 We welcome an attractive and tailored build form which we believe that Medway Council's Planning Department should be applying to new developments already, regardless of the proposals. The design of new developments should respect and celebrate the heritage and history of Hoo and Chattenden, including allowing for the reinstatement of former historic architectural designs and features.

8.4 We welcome the view that any new development needs to be sustainable and contribute to the vibrant-ness of a local community. We already believe that there is a vibrant local community with room to improve and that the sustainability of the local community is at full capacity. However, the building of over 12,000 homes on the Hoo Peninsula could have the opposite effect of reducing vibrant-ness and sustainability of the local community.

Page 9. Hoo Parish Council's response:

9.1 We welcome the view of preserving and improving the existing natural environment for local people and for local wildlife. However, Medway Council's Planning Department has a local track record of allowing development on former sports pitches in Hoo and Chattenden as well as the destruction of hedgerows, trees and most recently woodland. We believe that this statement from Medway Council's Planning Department is ironic. We welcome better accessibility to local natural assets throughout Hoo and Chattenden. However, we believe that improvements to accessibility can be made now.

9.2 We believe that one of the best and largest natural assets on the Hoo Peninsula is Lodge Hill. We believe that Lodge Hill should be turned into a large country park, a rival to Shorne Woods Country Park, in order to utilise such a vast natural asset on the Hoo Peninsula. We welcome improvements to local biodiversity. However, the building of over 12,000 homes on the Hoo Peninsula will have a significant negative impact on local biodiversity and close by SSSI sites.

9.3 We welcome the view that local key viewpoints and landscape identity needs to be protected and enhanced. However, the building of over 12,000 homes on the Hoo Peninsula will dramatically change the local landscape and undermine attractive and key viewpoints around Hoo and Chattenden.

9.4 We welcome the view of a careful approach to the physical, environmental, and visual impacts of any new development, in Hoo and Chattenden, to ensure for resilience and sustainability. However, we do not believe that these factors have been applied with recent development in Hoo and Chattenden and therefore we are not confident that such factors will be applied in the future.

9.5 We believe that the capacity of local services has already been reached and any expansion of services is limited, therefore any new housing development, without significant upgrades to local service provision, will always be unsustainable.

9.6 We welcome the view for a comprehensive green infrastructure network consisting of both natural green assets and public open spaces which will provide a seamless journey to key destinations for pedestrians and cyclists. However, we believe that improvements to this should be made now.

9.7 We welcome the planting of 1000s of new native trees and shrubs, the planting of kilometres of new hedges and acres of new fruit orchards. However, we believe that this statement from Medway Council's Planning Department is ironic when the authority has allowed the destruction of local trees and hedgerows on recent new housing developments. We believe that improvements to tree and hedgerow provision can be made now without the need to build thousands of homes. We believe that the creation of a green pedestrian bridge over the A228 is unrealistic and will not come to fruition.

9.8 We welcome the designing of new walking and cycling routes which connect the open space network across the Hoo Peninsula. However, we believe that this should already be a priority for Medway Council regardless of the proposals.

9.9 We welcome the idea of creating new biodiverse wetland habits south east of Hoo. Because of the local geography and proximity to the River Medway, this is an existing opportunity regardless of the proposals. We recognise that wetland habitats are an excellent way to capture carbon as well as providing a home for a variety of species.

9.10 We believe that Medway Council should be already seeking to enhance the natural environment of the Hoo Peninsula anyway, regardless of the proposals. We welcome the view that green corridors should be created between all existing settlements on the Hoo Peninsula. Particularly the green corridor gap between Hoo and Chattenden and Hoo and High Halstow. However, we do not believe that Medway Council's Planning Department will stick to these principles and will not put in place the legal protections of these green corridors ensuring they remain in place.

9.11 The green corridor between Chattenden and Strood (Wainscott/Frindsbury) is naturally enforced by the vast woodland around Four Elms Hill. We would like to see woodland created between Hoo and Chattenden and Hoo and High Halstow in order to provide and enforce a natural separation of those settlements. When such woodland has fully matured it will be very difficult for developers to want to build on woodland areas which would undermine the green corridors separating settlements.

9.12 We believe that if Medway Council's Planning Department ultimately gets their new passenger rail service and train station, which we highly doubt, this would put huge amount of development pressure on land surrounding the train station, including most of the green corridor between Hoo and High Halstow. We are not confident that the green corridor between Hoo and High Halstow will be protected and maintained indefinitely.

9.13 We believe that all green corridors across the whole of the Hoo Peninsula should be linked up with suitable walking and cycling provision, we believe that this can be achieved already. If all green corridors were adequately linked together it could form a greater country park across the whole of the Hoo Peninsula, centred around Lodge Hill and Deangate.

9.14 We believe already that the Hoo Peninsula has a wildlife rich future which can be worked on regardless of the proposals. We do not believe that Medway Council has already made the most of the Hoo Peninsula's natural qualities and provided the investment that the Hoo Peninsula community deserves.

9.15 We welcome the view that local blue infrastructure should be connected up and enhanced to improve biodiversity. We believe that this should be achieved already. The Hoo Peninsula is famous for its blue infrastructure and wildlife which Medway Council has not made the most of and provided the investment for so far. We are not confident that their approach will suddenly change with the building of over 12,000 homes on the Hoo Peninsula.

9.16 We welcome the view of improving key view points and creating opportunities to access and enjoy new vistas. However, the construction of over 12,000 homes on the Hoo Peninsula will have a detrimental effect on existing local view points and vistas, removing many entirely.

9.17 We welcome the view of bringing nature closer to people with an extensive and comprehensive green infrastructure network. We believe that improvements to this can be made already. Medway Council's Planning Department have not implemented many of these ambitions with recent housing development in Hoo and Chattenden, therefore we are not confident that there will all of a sudden be a dramatic change in their approach.

9.18 We would like to see Medway Council and Medway Council's Planning Department officially and properly acknowledge and recognise the natural landscape importance of the Hoo Peninsula as a valuable resource to be cherished, protected, and enhanced.

9.19 The Hoo Peninsula is a vast mosaic of intertidal wetland habitat as well as inland SSSI sites and nature reserves, the qualities of a national park. The Hoo Peninsula has the potential to be a major tourism draw for the Medway Towns if Medway Council cherished, protected and invested in the Hoo Peninsula rather than potentially cause tremendous harm with the construction of over 12,000 homes as they are proposing.

9.20 Medway Council needs to promote the sense of distinctiveness and uniqueness of the Hoo Peninsula, which encompasses the tranquility of the area including its nationally and internationally protected wildlife sites, as well as the agriculture, historic sites and village settlements which intertwine the peninsula.

9.21 Medway Council and Medway Council's Planning Department should join the bid and campaign with the Hoo Peninsula's Parish Councils in order to have the Hoo Peninsula formally join the Kent Downs AONB - the Hoo Peninsula is actually geographically part of the Kent Downs but is not included as part of the formal Kent Downs AONB jurisdiction.

9.22 We would also like to see Medway Council and Medway Council's Planning Department fully support the England Coastal Path that will run around the Hoo Peninsula, ensuring that there is investment for facilities and services for walkers and potential tourism from such a new coastal path - making sure that the Hoo Peninsula fully benefits from the England Costal Path.

Page 10. Hoo Parish Council's response:

10.1 We welcome the view that Hoo and Chattenden need to be better connected with transport. However, we do not believe that the choice of travel will include a viable and sustainable passenger train service. Therefore, the only viable and sustainable choice of travel is road which facilitates bus, coach, cycle, and walking.

10.2 We disagree with the view that any route within Hoo will be more convenient and safer by walking, cycling and public transport compared with the private car. We believe that this view is misguided by Medway Council's Planning Department. In fact, the building of over 12,000 homes on the Hoo Peninsula will mostly attract predominately private car users who will not be convinced to use public transport or walking/cycling provision.

10.3 We disagree with the view that the only opportunity to significantly increase rail capacity in the Medway Towns is on the Hoo Peninsula. We believe this is complete nonsense. We disagree with the view that the "new relief road" will address congestion on Four Elms Hill in the long term along with the proposals. The scale of Medway Council's Planning Department's proposals is too great for the new road transport provision being proposed to facilitate such development on that scale. However, we recognise that road transport provision upgrades are the only viable and sustainable option for Medway Council's Planning Department to consider. The congestion and AQMA at Four Elms Hill could be made worse and be extended further along the A228 by the proposals.

10.4 We welcome the view for new, improved, and safer routes in Hoo for walking, cycling and bus transport to discourage and reduce private car usage. We believe improvements to this can be made

now. We believe the use of walking distances to determine access to services and the density of development is misguided. We believe there will always be a majority of private car use usage in Hoo and Chattenden even though we have to encourage and improve the use of public transport as much as possible to reduce the impact of private car usage. We believe that a proportional mix of transport usage should be used instead, including private car.

10.5 We welcome the view that any development site has to be well connected the adjacent settlement envelope. New residents moving into such developments have to feel fully part of the community physically and not be cut off or be separate from the rest of the community.

10.6 We welcome the view of an enhanced bus service for the Hoo Peninsula, which can and should be achieved already. However, we are sceptical with the claim that locally half of all commuting trips in the future will be by public transport, we believe this view is misguided. We welcome the view that safe street layout design can improve walking and cycling, and we believe that this can be achieved already.

10.7 We welcome highly and well designed places as part of new and existing development and we welcome the view that 'Home Zones' can encourage more street and community activities through the integration of play, socialising and car parking. However, Medway Council's Planning Department has not demonstrated this recently with recent housing development sites, so we are sceptical that their approach will suddenly change.

10.8 We welcome the view that parking for bicycles and larger vehicles including commercial vans is a vital part of the key design process and not introduced as an afterthought. However, and again, Medway Council's Planning Department has not demonstrated this approach previously and therefore we are sceptical that they will suddenly change their approach.

10.9 We welcome the improvement and offer of local services to facilitate the existing population and new development. However, we are sceptical of the claim that existing and new residents will not need to travel outside of Hoo and Chattenden in order to use services. In fact, this contradicts Medway Council's Planning Department's view that local residents will use the new passenger rail service to access Strood and the rest of the Medway Towns. We believe that existing and new residents will continue to travel, mostly by private car, into Strood and the rest of the Medway Towns, therefore Medway Council's Planning Department's views and Development Strategy is misguided.

10.10 We welcome the view of an improved and extended road network. We believe that road infrastructure is the only viable and sustainable transport option for Medway Council's Planning Department to consider which should result in a reduction in the scale of the development proposals for the Hoo Peninsula.

10.11 We welcome more efficient and better connected bus services for the Hoo Peninsula which should already be a priority for Medway Council and Medway Council's Planning Department, regardless of the proposals.

10.12 We welcome an integrated and easily accessible pedestrian and cycling network for the Hoo Peninsula, of which should also be a priority for Medway Council and Medway Council's Planning Department, regardless of their development proposals. We believe improvements to bus services, cycling and pedestrian networks can be achieved already.

Page 11. Hoo Parish Council's response:

11.1 We believe that the Hoo Peninsula can be a vibrant and sustainable place to live, work and socialise locally without the need to build over 12,000 homes. We believe that Medway Councils Planning Department's view on what constitutes sustainable development on the Hoo Peninsula is misguided.

11.2 We believe that Medway Council's Planning Department has not properly demonstrated evidence of "joined up planning" with local service providers to ensure that service provision keeps up with the increases in homes and population, ensuring that overall sustainability is achieved as promised. We believe that Medway Council's Planning Department's view that local residents will not need to travel far or travel outside of Hoo and Chattenden in order to use services is misguided. In fact, the building of over 12,000 homes on the Hoo Peninsula may put additional pressure on services and infrastructure in Strood and the rest of the Medway Towns.

11.3 We believe that Hoo is already a hub for the rest of the Hoo Peninsula and that there is limited capacity for improvements to be made in order to accommodate a much smaller scale of development compared with over 12,000 homes currently proposed which is unsustainable.

11.4 We welcome any improvements to walkable neighbourhoods which are well connected. As well as a comprehensive pedestrian friendly green infrastructure network and improved public transport. However, we believe that improvements can be made to existing settlements now.

11.5 We believe that the creation of community hubs around Hoo and Chattenden, apart from one in Chattenden itself, will have a detrimental impact on existing businesses and shops within the centre of Hoo, many of these have served their local community for decades. We do welcome the view of creating high quality public spaces to encourage and provide room for community activities. However, we believe that improvements can be made regardless of the proposals. Medway Council already has within its powers to ensure that they are providing high quality public spaces and we are sceptical that the authority will all of a sudden start to do this. The creation of a business hub, around the proposed train station, will have a seriously detrimental impact on existing small local businesses and shops which have served their local community for decades.

11.6 We welcome the view of new fundamental services such as health and education that will serve Hoo and the rest of the Hoo Peninsula, located conveniently with good and easy access by walking, cycling and public transport. However, we are very sceptical of such claims when Medway Council's Planning Department has not shown evidence of or demonstrated "joined up planning" with local service providers in order for them to keep up with demand as housing increases on the Hoo Peninsula.

11.7 We believe it is confusing when Medway Council's Planning Department is calling their overall plan and creation a "Small Rural Town" but also describe settlements within this "Small Rural Town" as villages, such as "Village Living In Chattenden" and then bizarrely "Rural Town Living In Hoo". We are also concerned that High Halstow is now being included in the proposals which add to our fears that in time the green corridor between Hoo and High Halstow will be undermined.

11.8 We welcome the view that any development should be of mixed tenure homes and housing types, regardless of the proposals. We would like to see a preference for local resident's needs and requirements such as affordable housing for local young people and local young families. We would also like to see housing for local older people, such as flats and sheltered housing, which in turn frees up housing for other local residents. There also needs to be affordable housing for local single people and local couples without children. New housing in Hoo and Chattenden should not simply just accommodate for inward migration, particularly from London.

11.9 We welcome the view of new schools and healthcare as part of essential services. We welcome the creation of new and upgraded community and open spaces that encourage social interaction. We believe improvements and provision can be made now.

Page 12. Hoo Parish Council's response:

12.1 We believe that Hoo is already a desirable place to live and it already has the ability to correct the imbalance to make the settlement sustainable regardless of the proposals. We welcome the view that any development needs to have careful and thoughtful design and built environment. However, Medway Council's Planning Department has not demonstrated this previously with recent housing developments.

12.2 We welcome the view that any development needs to provide a mix of housing types to meet the needs of the local community. New housing should not just be designed to just attract inward migration from areas such as London. We welcome the view that young families, older people, and people with disabilities should be priorities, as well as single people and couples with no children.

12.3 We welcome the view that the build form of Hoo's existing rural character will be preserved by thoughtful density distribution. However, Medway Council's Planning Department is not concerned that the construction of over 12,000 homes on the Hoo Peninsula will result in the urbanisation of the area and therefore we are sceptical of such claims. We also believe it is ironic by Medway Council's Planning Department to say that building heights will be controlled and be in keeping as they have previously allowed multi storey blocks of flats to be built East of Bells Lane and most recently at the top of Bells Lane on a ridge. Therefore, we are not confident that Medway Council's Planning Department will stick to such principles.

12.4 We believe that the creation of a high density neighbourhood around the proposed train station, which we do not believe will come to fruition, will result in a sense of separated communities between Hoo and this proposed area. The higher density will also add development pressure around the proposed train station which will undermine the green corridor between Hoo and High Halstow. We fear that the area around the train station would become its own settlement in its own right.

12.5 We welcome the view that affordable housing in the form of low rise flats and terraced homes should be included on any development across Hoo and Chattenden, in keeping with the historic Victorian terraced houses around Hoo and Chattenden. We welcome the view that any new homes should be both attractive and inclusive, including the use of high-quality materials and harmony with existing neighbourhoods. However, this has not been the case with recent housing developments in Hoo and Chattenden. Therefore, we are not confident that all of a sudden Medway Council's Planning Department will change their approach.

12.6 We believe that Medway Council's Planning Department has already undermined Hoo and Chattenden's rural identity by allowing inappropriate recent housing developments. The claim that Medway Council's Planning Department has the ability to strengthen the rural identity of Hoo and Chattenden is not convincing.

12.7 We are sceptical of the claim and do not believe that the development of Hoo and Chattenden into a "Small Rural Town" will be gradual and controlled, we feel this is idealistic and contradictory. This statement also adds to our view that the proposed new passenger rail service is not viable and suitable do to the fact that it will take decades to even attempt to provide the demand for such a new service. In the meantime, while housing is being built, such a new passenger rail service would be running at a loss for the first twenty years or more - therefore the proposal is unviable and unsustainable.

12.8 We believe that the statement by Medway Council's Planning Department that the development of over 12,000 homes on the Hoo Peninsula will have a minimal impact on the local environment is misguided. We believe it does not require the construction of over 12,000 homes on the Hoo Peninsula in order to increase the environmental credentials and sustainability of a property or a group of homes. Medway Council's Planning Department has not demonstrated previously with recent developments the environmental and sustainability credentials they claim to want to put in place.

12.9 We disagree with the view that Hoo should allow for custom and self-build housing which delivers quality and sustainable design. We do not want Hoo to become a "sand pit" for Medway Council's Planning Department. We do not want a housing design "free for all" which could have a detrimental effect on the overall build environment of the area.

12.10 We welcome the view of healthy streets and public spaces. However, Medway Council's Planning Department has not demonstrated this principle previously with recent housing developments. We are sceptical of such claims. We welcome the view of attractive and inclusive design, but this has not been demonstrated previously by Medway Council's Planning Department and we are not confident that this approach will suddenly change with the construction of over 12,000 homes on the Hoo Peninsula.

Page 13. Hoo Parish Council's response:

13.1 We welcome the view of maintaining the existing village character at Chattenden. However, the village character at Chattenden needs to be greatly improved, particularly in North Chattenden (North side of Four Elms Hill). We welcome the view of a compact development on the former Chattenden Barracks to protect the SSSI. We would like to see a mix of housing types to cater for all groups in the community, such as affordable housing for young singles and couples with or without children. As well as housing for older people in order to downsize such as sheltered housing or low rise flats.

13.2 We believe that there are a number of green spaces in Chattenden that need to become part of the public realm and put to good use, such as sports pitches and play parks. We welcome the view of protecting the existing green gap between Hoo and Chattenden. However, we are sceptical of how Medway Council can legally enforce the green corridor to stop development going ahead in the future that would undermine the gap between both settlements. We would like to see woodland planted between the two settlements which when mature will make it harder for development to take place within the green corridor.

13.3 We support the view of a new local neighbourhood centre for Chattenden and a village square for community events and activities, surrounded by local services. We would support incremental development in North Chattenden, subject to creating a village centre for Chattenden itself (including services and infrastructure) regardless of Medway Council's Planning Department's current proposals for over 12,000 homes to be built on the Hoo Peninsula. We welcome the view of protecting the vast majority of existing mature vegetation. We would like to see Medway Council's Planning Department plant new woodland between Hoo and Chattenden in order to compensate for any loss of trees and vegetation from previous local developments.

13.4 We welcome the view of providing a housing typology of mostly terraced and semi-detached homes which will accommodate affordable housing for local young people and older people of all requirement types. Such housing needs to be attractive and in keeping with the historic Victorian terraced homes within Hoo and Chattenden, respecting the history of the area. We also welcome the view of encouraging communal uses and activities. We agree with the view of promoting a home zone approach and preserving the existing green buffer and woodland between Hoo and Chattenden and Chattenden and Strood (Wainscott/Frindsbury).

Page 14. Hoo Parish Council's response:

14.1 We are concerned that Medway Council's Planning Department previously promoted the creation of a country park at Deangate which seems to now be absent from the proposals. There were two country parks to be created, now there seems to only be one proposed to the South. We are not confident that Medway Council's Planning Department will keep promises of services and infrastructure and this situation shows the insincere behaviour of the authority.

14.2 The term "parkland" is used but it is unsure if this means the same as the country park that was proposed previously. Medway Council's Planning Department is possibly suggesting that housing is built within a country park setting at Deangate which would be unacceptable. We believe that the community asset of Deangate should form a large country park with Lodge Hill. We believe that it is unacceptable for any development to take place on the former Deangate Golf Club site. Medway Council's Planning Department needs to recognise that Deangate ultimately belongs to the local community and it is not a potential development site for the authority to profit from.

14.3 We believe that any new development's design should be influenced by the local natural landscape. We strongly oppose a "free for all" and "anything goes" approach to housing design. We are also concerned that "innovative design" could result in "tatty" and "bad taste" housing.

14.4 We are concerned that the proposed indicative neighbourhood centre on Dux Court Road is very close to the existing Deangate Recreation Ground. We believe it would be unacceptable if Deangate Recreation Ground was developed and Medway Council's Planning Department needs to be reminded that Deangate Recreation Ground is a separate site to the former Deangate Golf Club, and therefore the recreation ground is protected by the NPPF. We believe that Medway Council's Planning Department is being unclear with what it means by "parkland setting" and they need to confirm if Deangate is going to be a country park or not.

Page 15. Hoo Parish Council's response:

15.1 We recognise that Hoo is the most densely populated neighbourhood already, out of the proposed new neighbourhoods. We believe that the centre of Hoo can facilitate and serve the current population but will be undermined and harmed by what Medway Council's Planning Department is proposing, the construction of over 12,000 homes on the Hoo Peninsula and the creating of numerous neighbourhoods.

15.2 We believe that any new development needs to work harmoniously with the existing village setting and be sure to be in keeping with the rest of the settlement. We welcome the view that any new dwellings will be mostly comprised of terraced, low rise flats or semi-detached homes with tree lined streets. We believe that Medway Council's Planning Department has not demonstrated this previously with recent housing developments and we are sceptical of such claims. We are concerned that if neighbourhoods are too distinctive then this will lead to a fragmented community which will harm community cohesion.

15.3 We welcome the view of walking and cycling provision to allow easy reach of new and existing communities. We believe that this is important in order to keep in place a sense of community between all the proposed neighbourhoods. We welcome attractive and healthy streets which can be applied to any housing development and we welcome active neighbourhood centres. However, so far Medway Council's Planning Department has not demonstrated this previously with recent housing developments, so we are sceptical of such claims. Medway Council already has not made the most of existing neighbourhood centres in Hoo and Chattenden.

Page 16. Hoo Parish Council's response:

16.1 We believe that development North of the inland Saxon Shore Way will have a detrimental effect on some of the best viewing points and vistas of Hoo and Chattenden. We believe that one of the key reasons for sparing most of the land which is South of the inland Saxon Shore Way is because the topography of the land is not preferred by developers. This is because of the steep hills and inclines along this stretch of land which make development here more difficult and more expensive. We are sceptical to believe that the predominate reason for the exclusion is due to the proximity to sensitively woodland and the estuary areas because the construction of over 12,000 homes on the Hoo Peninsula will have a detrimental impact on all SSSI sites and all sensitive estuary sites collectively.

16.2 We welcome the view that any open space should be managed to a high standard for people and for wildlife and that such management should reflect local farmland connections. However, Medway Council has not demonstrated previously that they can manage open space to a high standard for people and for wildlife, particularly with reference to the former Deangate Golf Club. We are sceptical to believe that all of a sudden Medway Council will begin to manage open space to a high standard for people and for wildlife just because of the construction of over 12,000 homes on the Hoo Peninsula. We welcome the improvements to any footpaths and walkways, this can should and could be achieved anyway regardless of Medway Council's Planning Department's proposals.

16.3 We believe that one of the only sensible locations for any new services is opposite the Hundred of Hoo Academy, this location will provide a mid-way point between Hoo and Chattenden. However, local service development needs to be sensitive to the surroundings in this area and be of high quality design. We believe that any new development needs to reflect local farmland connections and be in keeping and sensitive to the surrounding settlement.

Page 17. Hoo Parish Council's response:

17.1 We strongly disagree with the view of creating a "new town quarter" based around the proposed train station. We feel this would seriously undermine local businesses and the centre of Hoo. This could result in a fragmentation and separation of the communities of Hoo and this new neighbourhood by the train station which would damage community cohesion. We do not believe that this proposed new neighbourhood, by the proposed train station, is in keeping with the rest of the settlements on the Hoo Peninsula.

17.2 We do not believe that the high density and high building heights being proposed for this area is in keeping with the rest of the settlements on the Hoo Peninsula. We welcome the view of providing affordable homes for local singles and young families, although this can be achieved already. However, we strongly reject any attempt of gentrification on the local community with the provision of homes to attract external young professionals, predominately from London. We are very concerned that this proposed new neighbourhood around the proposed new train station is an attempt of gentrification on the local community.

17.3 Medway Council's Planning Department has stated that the future success of the "rural town" at Hoo overall depends on the creation of this new neighbourhood around the proposed new train station. We do not believe that the proposed new passenger rail service is viable or sustainable and we believe the proposed service will not come to fruition. Therefore, the creation of the proposed new neighbourhood around the proposed new train station is void and in turn the overall viability and sustainability of the "Small Rural Town" is also void. We are concerned with the view of a creative approach to housing design in this proposed new neighbourhood would most certainly result in the proposed neighbourhood being out of keeping with the rest of the settlements on the Hoo Peninsula. We believe the creation of this new neighbourhood around the proposed train station would seriously undermine and threaten the countryside and the green corridor between Hoo and High Halstow.

Page 18. Hoo Parish Council's response:

18.1 We believe that it would be inappropriate for us to comment on the individual proposals for High Halstow. Medway Council's Planning Department should seek the feedback from High Halstow Parish Council regarding the individual proposals for High Halstow.

Page 19. Hoo Parish Council's response:

19.1 We support improvements made to Kingsnorth as a commercial centre and employment hub. However, such improvements and increases in commercial activity need to be supported by viable, sustainable, and adequate provision and improvements to infrastructure. This does not include the unviable and unsustainable proposal of a new passenger rail service on the Hoo Peninsula. We are

concerned with the physical expansion of Kingsnorth into surrounding agricultural fields when the brownfield footprint of Kingsnorth has not yet been fully utilised and occupied. We would like to see a regular bus service to Kingsnorth established which would allow local residents and residents from the Medway Towns be able to commute to Kingsnorth for work.

Page 20. Hoo Parish Council's response:

20.1 We believe that the scale of Medway Council's Planning Department's proposals is unviable and unsustainable. The proposals are not justified and are not sound. We are very sceptical that Hoo, Chattenden and High Halstow will retain their rural character and unique identities, in fact, we concerned that such proposals will have a disastrous consequences for the local community. The proposed new passenger rail service is unviable and unsustainable, and we believe will not come fruition in the end, this is a fundamental flaw in Medway Council's Planning Department's proposals. We accept that the only viable and sustainable upgrades in infrastructure are road, bus, coach, cycle, and pedestrian. However, these improvements will only allow a limited amount of housing development on the Hoo Peninsula.

20.2 We believe that Medway Council should already be performing a number of improvements to green and blue infrastructure on the Hoo Peninsula and we are not confident that their approach will suddenly change with the construction of over 12,000 homes. We sceptical of the promise of new and improved local service provision when Medway Council's Planning Department has not demonstrated "joined up planning" with local service providers. We believe that overall sustainability of the "Small Rural Town" will not be achieved to plan which will result in disastrous consequences for the local community. We do not believe that the fragmentation and range of neighbourhoods will create a sense of a united and singular community and it will in fact undermine community cohesion.

Page 21. Hoo Parish Council's response:

21.1 No detailed response is needed by Hoo Parish Council for this section. However, because of the coronavirus pandemic, we would like to see reassurances that there will be a full and comprehensive consultation, with local residents and organisations, on Medway Council's Planning Department's proposals, including the draft Local Plan and the Development Framework for Hoo and Chattenden. It is unacceptable to just apply the legal minimum 6-week time frame for consultations when Medway Council's Planning Department's proposals are of a considerable scale.