

Hoo St Werburgh and Chattenden Neighbourhood Plan
Planning Policy,
Medway Council,
Gun Wharf,
Dock Road,
Chatham, Kent, ME4 4TR

Gladman House
Alexandria Way
Congleton
CW12 1LB

BY EMAIL ONLY

16th February 2024

Dear Neighbourhood Planning Team

RE: Hoo St Werburgh and Chattenden Neighbourhood Plan Regulation 16 Consultation

This letter provides Gladman Developments Ltd.'s (Gladman) response to the Hoo St Werburgh and Chattenden Neighbourhood Plan under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman specialises in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to Neighbourhood Development Plan preparations across England.

Comments made by Gladman through these representations are provided in consideration of the Neighbourhood Plans suite of policies and its ability to fulfil the Neighbourhood Plan basic conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the Planning Practice Guidance (PPG).

Relationship to Local Plans

To meet the requirements of the Framework and the Neighbourhood Plan basic conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The Neighbourhood Plan will be tested against the Medway Local Plan 2003 as the overarching planning policy document for the area and form the current basis of the decision making process in relation to all planning applications.

This document is clearly considerably dated and the strategic policies within do not address identified needs of the district based upon relevant or up-to-date evidence. However, Medway Council are in the process of developing a new Local Plan and whilst this has been subject to delays, the Council have recently approved a new Local Development Scheme (LDS). The dates proposed in the LDS state that Medway will seek to consult on their Regulation 19 documents in January 2025 with Submission of the plan to follow in June 2025.

It would therefore be ineffective for the Neighbourhood Plan policies to rigidly align with the 2003 plan should it then not support Medway Council in delivering sustainable development opportunities in their emerging development plan documents.



Failure to align with the strategic policies of the emerging Local Plan would render the Neighbourhood Plan quickly out of date in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004.

To ensure the Plan remains sufficiently flexible, Gladman consider it would be necessary for the Neighbourhood Plan to take a positive approach to meeting housing needs and supporting sustainable growth opportunities in the Plan area. A similar approach was taken forward in the Cliffe and Cliffe Woods Neighbourhood Plan, which included the following text and was found acceptable by the Examiner:

Our approach to development of housing in the Neighbourhood Plan area is to accept that although Medway Council has not currently allocated sites in the Neighbourhood Plan area for housing, the future development of the Local Plan may result in some allocations prior to its final adoption proposed for 2025¹. In addition, applications are likely to be received and may be approved before the Local Plan is adopted. This means that Cliffe and Cliffe Woods will play its part in meeting the number of homes Medway Council needs. Whilst the need for new homes is recognised, any development within the Neighbourhood Plan area should be sustainable and achieve the Neighbourhood Plan Vision.

Page 19, Cliffe and Cliffe Woods Neighbourhood Plan (May 2023)

Vision and Aims

Gladman supports the overall vision of the Neighbourhood Plan notably the recognition that 'sustainable growth that meets diverse local needs will be supported, including enhancing facilities available to the local community'.

Employment and Community Facilities

The Neighbourhood Plan recognises that there are limited job options within the NP area, leading many residents to work outside the Parish, including a notable number that commuting further afield to London. Gladman support proposals aimed at safeguarding local job prospects and improving community amenities, with an interest in expanding them when possible.

Gladman therefore broadly welcomes the objectives of the Policies to support employment and Community Facilities (HOO1, HOO2 & HOO3) which aim to reinforce employment, community facilities, and industrial/distribution developments.

To ensure that the employment policies of the Neighbourhood Plan are not rendered out of date by the adoption of a new Local Plan, we believe that the wording of these policies should be in a flexible manner that allows for future alignment with the emerging Local Plan.

To this extent, the Neighbourhood Plan should support the principle of providing new employment opportunities and community facilities within reasonable walking and cycling distance of existing residents and future residents. This will assist in creating more sustainable live-work patterns, including reducing reliance on facilities outside of the Neighbourhood Plan

¹ Medway Local Development Scheme October 2022

area. Policy HOO2 broadly reflects this in point 1, supporting community facilities in the village centre and “in other locations”, including on “open land”.

Policy HOO1 should be consistent with the approach of Policy HOO2 to not unduly constrain suitable employment opportunities outside of the village centre. As drafted the wording of Policy HOO1 would not meet the requirements of the basic conditions in that it would not contribute to the achievement of sustainable development and Gladman are seeking a modification as below (proposed new text in blue and underlined with deletions marked in red and struck through):

1. Employment development (Use Class E) will be supported in the village centres and in other locations where:

- a. The site has access to a highway with sufficient capacity;**
- b. There is no significant harm to the amenities of residential properties by reason of visual intrusion, noise, dust, disturbance, vibration, vehicle movements or other impacts; and**
- c. The type and scale of the new employment facilities complements any existing provision of similar facilities nearby.**

- ~~**a. Within the village centres;**~~
- ~~**b. Brownfield sites;**~~
- ~~**c. Redevelopment or improvement of existing employment sites.**~~

Housing

Gladman acknowledge the recognition that the Neighbourhood Plan does not seek to allocate sites for housing as the emerging Medway Local Plan which will address ‘strategic’ matters including housing allocations.

The neighbourhood plan notes that ‘*Sporadic house building has occurred over the past 60 years. More recently, housing development has produced separate communities within the village, due to very poor connectivity. This is clearly unsustainable. Future development needs to have cohesion and connectivity to ensure there is a sense of place throughout the village, with the village centre at the heart of our community.*’

Gladman acknowledge the aspiration to achieve greater community cohesion through development and recognise the benefit that an overarching strategy for future growth across the NP area and wider Hoo Peninsula would bring.

Landscape and Environment

HOO8: Landscape and Environment

Gladman support the general principles set out in the HOO8 Landscape and Environment policy, however we consider that the current wording is too prescriptive and restrictive in places. It also conflicts with the NPPF in several areas, most notably NPPF paragraphs 185 - 186 which protect areas designated as SSSI, SPA and Ramsar sites and irreplaceable habitats (such as Ancient Woodland).

Gladman therefore consider Policy HOO8 (Landscape and Environment) would currently not meet the requirements of the basic conditions in that it would not have regard to national policies and guidance and would not contribute to the achievement of sustainable development.

The policy should not seek to repeat national policy and guidance but instead focus on local considerations and concerns. Gladman recommend that the policy is modified to read:

1. Development should take opportunities to enhance, and avoid causing significant unacceptable harm to the area's landscape character, flora and fauna, and habitats, to achieve overall biodiversity net gain.

2. Development should avoid causing loss or harm to biodiversity, or:
a. where habitat loss or damage cannot be avoided, it should be minimised;
b. opportunities should be taken to restore damaged or lost habitat; or
c. as a last resort, habitat loss or damage should be compensated.

~~**3. Development should take opportunities to enhance and should not harm:**
a. Designated sites, including Ramsar, SSSI and Special Protection Area;
b. local woodlands, including ancient woodland;
c. lakes, chalk streams and other water features.~~

~~**4. Development adjacent to the Ramsar, Special Protection Area, SSSI and other designated and protected landscapes should include landscape buffer zones, where supported by evidence, to provide visual separation and avoid disturbance of habitats or adverse impacts on biodiversity.**~~

5. Trees and other natural features of value should be retained and be incorporated into the design and layout of development, where practicable.

6. Development that creates a new urban edge to the open landscape areas of Hoo should include landscape transition zones to avoid the creation of hard edges.

~~**7. Development should cause no harm to the open character of the landscape separation between Hoo and Chattenden.**~~

8. Landscape design and planting in development should use local native species or other species of high environmental value.

9. Development should take opportunities to enhance wildlife and nature conservation.

10. Development should not lead to a loss of ~~must have no adverse impact on~~ allotments, orchards and other facilities for local food growing, and new facilities for local food growing will be supported.

~~11. Development should not lead to the loss of the best and most versatile agricultural land.~~

HOO11: Sustainable Transport and Active Travel

Gladman support the Neighbourhood Plan aspirations to promote sustainable modes of transport. The Neighbourhood Plan seeks improved connections to footpaths and open space, improved public transport, provision of cycleways and improved safety and condition of roads within the Neighbourhood Plan Area. Gladman broadly support the aims of this policy but consider the below modification is necessary to Policy HOO11 (Sustainable Transport and Active Travel) bullet 3 to ensure it is consistent with the NPPF and planning legislation:

3. Development must be supported by adequate road infrastructure and/or financial contribution where necessary to mitigate the impact of development and to safely support additional traffic movements where it is evidenced there would be an unacceptable highway safety impact, and/or the impact the transport network would be severe, ~~with additional pedestrian crossings where necessary.~~

Conclusion

Gladman welcomes the opportunity to comment on the Regulation 16 Neighbourhood Plan consultation. As set out in these representations, we broadly support the aims and aspirations of the Neighbourhood Plan but consider there are a small number of policy changes required to achieve compliance with the basic conditions.

I trust that you will find these comments useful, but should you have any questions, please do not hesitate to contact me.

Yours faithfully,

[Redacted signature]

[Redacted contact information]