

Please contact: Catherine Smith
Our ref: CS/
Your ref:
Date: 25 April 2024



Andrew Matheson
Neighbourhood Plan Examiner for
Hoo St Werburgh and Chattenden

BY EMAIL ONLY

Culture and Community
Regeneration, Culture & Environment
Medway Council
Civic Headquarters
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR
(DX56006 STROOD)
Telephone: 01634 306000
Facsimile: 01634 331729
Direct line: 01634 331358

Email: [REDACTED]

Dear Mr Matheson

Submission of Hoo St Werburgh and Chattenden Neighbourhood Plan for Examination

Medway Council comments on Hoo St Werburgh and Chattenden Neighbourhood Plan

Medway Council is submitting the draft Neighbourhood Plan for Hoo St Werburgh and Chattenden for examination. The Council has engaged with the Parish Council and the Neighbourhood Planning Group in the development of this Neighbourhood Plan (NP) over recent years. The Council recognises the hard and lengthy work and commitment of local residents in preparing this NP, and the strength of community attachment to the villages of Hoo St Werburgh and Chattenden, and residents' aspirations for a sustainable future.

The Council considers that the NP meets the Basic Conditions, but does have reservations on some aspects of policy wording, which may restrict development beyond the provisions of sustainable development in the National Planning Policy Framework. Some wider representations have been made on similar matters, and we request that this is an area of focus in the examination, with consideration given to potential modifications on policy wording.

Publication of Draft Neighbourhood Plan at Regulation 16

Hoo St Werburgh and Chattenden Parish Council submitted its draft Neighbourhood Plan to Medway Council on 16 October 2023. The Planning Service presented a report to [Cabinet](#) on 19 December 2023, seeking Cabinet approval to publish the draft Neighbourhood Plan for a six week period for representations. The plan was published from 8 January to 19 February 2024. The Council publicised the draft NP through a public notice in the local media, direct notification to statutory consultees and organisations, businesses and individuals who have signed up to the Council's planning policy mailing list. The NP was also publicised through a high-profile link on the Council's website, use of the Council's social media bulletins on planning and regeneration matters, and in local

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libraries and community hubs. Materials for available to review on the Council's website and in local libraries.

21 representations were received to the consultation – these are attached in Information Pack 2.

Medway Local Plan

The current Medway Local Plan was adopted in 2003 and although somewhat dated, the majority of the policies are compliant with the NPPF. As the Council does not have a 5 year housing land supply, it does not rely on the settlement boundaries in the 2003 Medway Local Plan when considering planning applications.

The preparation of the new Medway Local Plan has been a protracted and complex process. The Council has a high level of Local Housing Need, at 1658 homes a year, and a range of constraints. There are various environmental constraints, including over 30% of the borough having designations of international or national importance for biodiversity or landscape, flood risk, a high proportion of best and most versatile agriculture land, designated Air Quality Management Areas; transport and wider infrastructure constraints – notably Medway sits on the strategic road network, served by four motorway junctions; built heritage of significance; and areas of challenging viability.

Many of these issues apply to the parish of Hoo St Werburgh and Chattenden and provide context for the Neighbourhood Plan.

Following the Elections in May 2023, the new administration of Medway Council has committed to getting the new Local Plan in place as a key corporate priority.

The Council has produced a revised [Local Development Scheme](#) (LDS) which was approved by Cabinet in February 2024. This sets out the programme for the preparation of the new Medway Local Plan. The new Local Plan will cover the period up to 2041. The key stages in the LDS are:

- Regulation 18 consultation – June/July 2024
- Regulation 19 Publication of Pre-Submission Draft Plan – January/February 2025
- Submission for independent examination – June 2025

The Council is preparing to publish additional information for consultation this summer. The Regulation 18 consultation will include details on emerging policies and options on how the Local Plan could meet the development needs over the plan period. The consultation document will include an indicative preferred spatial strategy, and reasonable alternatives to the growth strategy. An interim Sustainability Appraisal and Habitats Regulations Assessment will be published with the Regulation 18 consultation.

The Council has consulted on earlier Regulation 18 documents and has prepared a number of supporting documents to the Local Plan. These include an updated [Land Availability Assessment](#) in 2023. The published work shows that there is much interest in promoting major development on the Hoo Peninsula, particularly in the parish of Hoo St Werburgh and Chattenden. In earlier consultations, and wider planning and regeneration

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work, the Council has identified Hoo St Werburgh and neighbouring villages as potential locations for development allocations in the new Local Plan. Potentially this could involve the expansion of the parish by thousands of homes, together with new services, over the plan period. This potential growth was illustrated in a [Hoo Development Framework consultation document](#). Although this has no specific planning weight and any development proposals are subject to review and the progress of the new Local Plan, it does provide a useful overview of the context of the area around Hoo, including constraints and wider issues.

The Parish Council and Neighbourhood Planning group in developing the Neighbourhood Plan have been aware of the potential for strategic scale change in the parish that could result from the new Local Plan, but as the Local Plan has not progressed, do not have planning certainty. Medway Council recognises the challenges for the Neighbourhood Planning group.

As the Council will shortly be publishing the next stage of work on the Medway Local Plan for consultation, it is considered that the Examination of the Hoo St Werburgh and Chattenden Neighbourhood Plan would benefit from the updated context on the new Local Plan. The consultation will provide an indication of the spatial strategy for Medway's growth and key issues for the vision and strategic objectives for the Local Plan.

The Regulation 18 consultation document will be presented to Cabinet on 4 June, seeking member approval to publish for consultation from 17 June to 29 July. The Cabinet agenda and papers will be published on 24 May 2024.

The Council considers that Hoo St Werburgh and Chattenden NP should be examined in the context of the emerging Medway Local Plan, and the additional information to be published at Reg 18 consultation this summer.

Medway Council comments on the draft Hoo St Werburgh and Chattenden NP

The Council made representations at Regulation 14, which are provided in the package of examination materials (Information pack 3). The Neighbourhood Planning Group made some amendments to the draft plan following consideration of the comments made at Regulation 14. However many of the points made by the Council at that consultation stage still stand, as the NP group did not consider further amendments necessary to the plan to respond to all comments raised.

The Council's comments include those provided by a range of services across the authority. These are set out in detail in the attached appendix, with some additional points raised in the representations at Regulation 16.

The Council's key issues relate to the position of the NP in advance of further certainty on the Medway Local Plan, reflecting the date of the current 2003 Local Plan. The Council recognises the difficulties for local communities preparing their Neighbourhood Plans in the absence of an up-to-date Local Plan, and does not wish to delay this tier of plan making. However, the Council is concerned that the Neighbourhood Plan should provide an

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effective basis for achieving sustainable development both prior to and following the adoption of the new Medway Local Plan. There is potential for some modifications to the plan to allow for reference to policy and allocations in the new Local Plan, so that the NP is not at risk of becoming outdated in a short period of time.

The draft NP is largely silent on the potential for significant change in the parish, that may follow from the Medway Local Plan. Some of the policies, such as HOO4, and in conjunction with HOO8 appear to minimise the opportunities for sustainable development. The draft NP provides very limited locations in which housing development would be supported, so the plan is constrained in contributing to the achievement of sustainable development. The Council considers that there is scope to modify the wording of a few policies to address these concerns, and areas of potential conflict with the NPPF, and provide greater flexibility.

More detailed comments from the Council relating to clarification and wording of specific policy areas, supporting information and evidence are set out in the attached table. The examiner is also directed to review the comments submitted by Medway Council at Regulation 14, as many of these issues still stand as concerns as they were not viewed by the NP group as needing modifications in the Regulation 15 version of the plan.

We welcome your examination of this draft Neighbourhood Plan and are happy to provide you with any further information that would be helpful to this process.

Yours sincerely



Catherine Smith
Head of Planning Policy
Planning Service

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Hoo St Werburgh and Chattenden Neighbourhood Plan – Medway Council Regulation 16 consultation comments

Service	Reg 16 Officer Comment
Landscape	<p>Note that the Design Code document is dated November 2021 and has not been refreshed and some contextual information is now outdated.</p> <p>Note that Medway Council is preparing an updated Landscape Character Assessment for publication in June 2024 with the Local Plan Regulation 16 consultation. There would be scope for modifications to the NP to take account of new information.</p> <p>Proposals for development edges appear very linear, and are not reflective of a rural edge of settlement. Likewise, some typologies do not enable enough space for the creation of tree planting e.g., the 'Lane' typology and should be aligned with paragraph 136 of the NPPF.</p> <p>Enclosure analysis is not reflected within some street typologies. Streets will as a result be significantly more enclosed than the character analysis.</p> <p>The Design Code does not appear to meet accessibility guidelines with use of small font sizes, and images not providing supporting alt text. Image resolution is also low in places, and some diagrams are without accompanying legends to aid legibility and understanding.</p>
Urban Design	<p>Hoo St Werburgh & Chattenden Neighbourhood Plan Regulation 16 version December 2023</p> <p><u>General:</u></p> <p>Q1 – Local Plan: Question why the documentation is not connected to the emerging Local Plan. This would give the Neighbourhood Plan increased longevity and relevance.</p>

- 0.2 – Settlement Identity: There is no reference for how Hoo and Chattenden will be differentiated through Policies.
- 0.3 – Settlement Identity: It is unclear how coalescence will be avoided between the two settlements.
- 0.4 – The Neighbourhood Plan does not show any potential development sites, which is commonly included within Neighbourhood Plans that I have previously read.
- 0.5 – Settlement Classification: In my opinion Chattenden should be classed as a village and not a hamlet.
- 0.6 – Associated Imagery: Whilst images are helpful, the content of the image should be aligned with the associated Policy.
- 0.7 – Format: Will the Neighbourhood Plan be viewable online? If so, diagrams would benefit from being interactive and easy to view.
- 0.8 – Proof Reading: Would recommend that the document is checked for typo' (e.g., p36 storage etc.)
- 0.9 – Other Documents / Further Reading: The inclusion of this section is helpful. Can this be expanded across each policy chapter?

6. Place & Heritage - H006: Design

Page 40:

4. Give examples.

6. Amend to "Hard landscape materials"; provide examples.

7. Question what this will result in. Applicants will state that their proposals are innovative and well designed, regardless of quality.

8. Amend to "Sustainable Drainage Systems (SuDS) should be sensitively designed to form an integral part of new open spaces and green infrastructure, wherever possible".

Page 41 – Interpretation:

- 1st Paragraph: What is meant by green design – is this green and blue infrastructure?
- 4th Paragraph: amend to "public open spaces/ interfaces should enhance...".

Page 42:

- 2nd Paragraph: Add at the end of the sentence "and the effects of climate change".
- Water Infrastructure Guidelines: Provide text on tree planting and other soft landscape components.

7. Landscape and Natural Environment

Page 49 - Evidence & Planning Rationale:

- 1st Paragraph: Text is repeated.

Page 50 – Planning background:

- Notes Chattenden Valley as being an important green corridor that maintains the identity of Hoo and Chattenden as distinct settlements.
- Please provide a location map of this feature and the extents of separation desired between Hoo and Chattenden, as part of providing a strategic gap.
- At present open space is to come forward under planning applications within development.

H008: Landscape and Environment

- No reference made to the Medway Landscape Character Assessment (either current or updated), including relevant character area qualities and guidelines.
 - No information has been included regarding the benefit, ambition and requirement for tree planting, including in new and retrofitted environments.
 - There is no policy associated to the ambition and promotion of play within Hoo or Chattenden. Please refer to Greenspaces Officer for further information.
1. What is the threshold of significant harm? This will be open to interpretation from future planning applications.
 2. Tie into the wording of Biodiversity Net Gain.
 4. “protected landscapes must include landscape buffer zones”.
 6. Expand on what is meant by a “landscape transition zone”.
 7. Define and locate separation between Hoo and Chattenden.
 8. amend to “of high environmental and biodiversity value”.
 10. This could adversely impact upon any future development within the parish, if it is interpreted as referring to all agricultural land. This policy should be clarified.
 11. Note that much of the land within the Parish is the most versatile agricultural land and therefore this policy significantly restricts development.

Page 53:

- Interpretation – How does the parish recommend that habitat hierarchy is demonstrated?
- Design features: add green corridors, hedges and trees.

Page 54:

- 1st bullet: Do the Parish have a way of thinking for where new paths, green spaces and corridors should be located?

	<ul style="list-style-type: none"> - 2nd bullet: Amend to “Opportunities to use appropriately and sensitively designed SuDs schemes to augment landscape and biodiversity”. <p>Page 55:</p> <ul style="list-style-type: none"> - Map 7: Ancient woodland is not easily legible. <p><u>H009: Local Green Space:</u></p> <ul style="list-style-type: none"> - Does the NP wish to create new designations for protected open space, such as Deangate Ridge etc. <p>2. Restructure sentence.</p> <p>Page 59: Preference would be for the paddock at the southern end of Elm Avenue to come under Hoo Common ownership and long-term management.</p> <p><u>H0012: Paths</u></p> <p>3. Amend National Coastal Footpath to King Charles III England Coast Path.</p> <p>Interpretation:</p> <ul style="list-style-type: none"> - 2nd Paragraph: Typo: amend ‘black’ to ‘blank’. - 2nd Paragraph: Amend to “blank elevations or inappropriate and high boundary treatment flanking a path”. - 3rd Paragraph: Reword. - Page 69: Mapping would benefit from separate maps for promoted routes and cycle paths e.g., King Charles III England Coast Path, Saxon Shore Way etc.
Principal Transport Planner	<ul style="list-style-type: none"> • H0011 <ul style="list-style-type: none"> ○ A requirement for all developments to include electric vehicle charging is supported, but there is no need to extend this provision to electric cycles for all developments. While some provision would be good at large developments, electric cycles can typically be charged at homes without the need for specific infrastructure, and requiring developers to make special accommodations is likely to be an unnecessary obstacle. ○ The policy generally does not appear to prioritise active travel and public transport movements over private car use, instead opting for language that favours a balance between private vehicle use and other modes of transport. It would be better to see the policy state that pedestrian, cycle and public transport provision should be favoured over private car use.

	<ul style="list-style-type: none"> ○ Developments should of course be accommodated by adequate road infrastructure to support them, but (similar to the above) building more car/road infrastructure this should not be the first port of call – instead it would be preferable to see developments seek to improve access by other modes of travel before constructing wider roads or junctions. This is again a matter of priorities between car-use and other modes of transport. ○ It is requested that new homes provide parking bays to accommodate modern vehicles, but it is not stated explicitly what sizes these bays would be. It is assumed this would be 2.5m x 5m bays – if this is the case, it would be best to ensure this is written into the policy, for the avoidance of doubt. Else this risks being overlooked. ○ New roads already have to ensure that they can accommodate service and emergency vehicles – this policy does not appear to offer much more apart from requiring ‘easy passage’, which has the potential to encourage building of wider roads than necessary, which will encourage speeding and thus potentially lead to more serious traffic incidents. This part of the policy also seems to identify public transport as an after-thought. If there is a specific issue that is trying to be resolved by this policy, it should be better targeted. <ul style="list-style-type: none"> ● H0012 <p>No comments – these appear to be mainly PROW matters</p>
Greenspace Development Officer Page 17	<ul style="list-style-type: none"> ● This sentence is a bit confusing. Need a bit of clarity of who owns what and the sites etc - Says "<i>Parish Council own Council also owns and manages recreation and burial grounds.</i>" ● Is there a waiting list for the existing allotments? ● Then lists just 3 sites beneath. Also need to include all public open space sites here such as Hoo Common and Hoo Village Green here. ● Reference Deangate Ridge former golf course and sports facility; - is owned and managed by Medway Council
H005	<p>Housing Standards:</p> <p>4c. <i>Public space in very close proximity to the site</i> – amend to "Public <u>open</u> space.."</p> <p>5. <i>Housing schemes should include or have access to adequate play and recreational facilities in easy walking distance.</i></p> <p>This needs to be strengthened and I would suggest this is changed to: "New housing schemes should include on site open space facilities within easy walking distance to address the needs of new residents such as play, allotments, outdoor sports. These should follow the recommended NPPF and Fields in Trust guidance. "</p>

H009	Local Green Space: Is there a reason just these two sites have been included and not other green space sites such as the allotments, Pottery Road and Kingshill Recreation Grounds?
9.1	Planning Infrastructure Priorities: New major developments should also be providing new outdoor sport facilities (such as football and tennis) on-site so they are more accessible, rather than just all facilities focused at Deangate. These should be in line with NPPF and Fields in Trust guidance. This should be cross referenced with Policy H005 – Housing Standards to make the case.