**Medway Council response to Hoo St Werburgh and Chattenden Neighbourhood Plan Examiner’s Initial Queries**

Medway Council, as local planning authority, welcomes the opportunity to provide comment on your initial queries on the Hoo St Werburgh and Chattenden Neighbourhood Plan. The council is in general agreement with your comments raised, and suggestions for some modifications to the formatting and content of the plan.

**2. Background Information**

The council is publishing a Regulation 18b consultation document supporting the preparation of the new Medway Local Plan in mid July 2024. This consultation has been slightly delayed due to the General Election being called for 4 July. We are presenting the Regulation 18b consultation document and supporting information to our Cabinet meeting on 9 July 2024. We intend to start the formal consultation on 15 July.

The Regulation 18b consultation document will include details of proposed policies, and options for spatial strategies to meet Medway’s development needs over the plan period to 2041. As part of this work, further information will be available to view on potential development sites across Medway. The annual Local Housing Need in Medway is for 1658 homes, around 28,000 over the plan period. In providing for this level of need, significant growth will be required across Medway. Although the Neighbourhood Plan is clear that it is not seeking to allocate sites, reference to the scale of housing need across Medway is an important context in planning at the parish level. With the publication of the Regulation 18b consultation, there will be additional information on the options for growth in the parish and the scale of potential development allocations.

We will also be publishing a number of evidence base documents with the consultation, including on landscape, green infrastructure, transport and gypsy and traveller accommodation needs. Some of this work may be useful context for the Hoo St Werburgh and Chattenden Neighbourhood Plan.

In response to your specific policies queries, we would like to make the following comments:

 **4. Employment and Community Facilities**

***Village centres and Employment***

**HOO1: Village Centres and Employment**

1. *i) Where is the location/extent of the village centres defined?* Noted that a detailed map would make the policy more effective.
2. *Some remote brownfield sites may be poorly located in relation to the expectation of walkability?*

Agreed – for it to work, brownfield locations need to be within appropriate walking distances supporting sustainable travel. However, if the intention is for retail E use class to be located here, it goes counter to supporting healthy centres.

**Overall:** The Council would agree with the questions raised. There is a lack of definition of what E class uses would be acceptable in the listed locations. Each location is different and whilst some E use classes may be acceptable in some locations, some may not be in other locations, i.e. industrial uses would not be appropriate in a village or neighbourhood centre. The type of E class will need further consideration in these varied locations.

Separate but related to this is the scale of the proposal. This will also need consideration and is missing from the policy. Example – a 2500sqm supermarket would not be appropriate in a neighbourhood centre made up of 3 units no bigger than 100sqm and dispersed across the village. Such a provision would be disproportionate to the existing provision but possibly also to the existing village itself.

Furthermore, bullet 1 (in its current form) does not consider strengthening the existing centres. Locating a centre appropriate E class use in an employment location (for example) will divert trade away from the centre and dilute its offer. It will also have implications for the employment locations in that it will set a precedent for acceptable uses in an employment location. This will only exacerbate the health of centre and its long term sustainability. There is also no reference to a sequential approach or an impact test, which would help strengthen centres and support sustainable ambitions.

The latter part of bullet 1 makes reference to support ‘subject to compliance with the latter parts of the policy’. Can one interpret that as compliance to be met with bullets 2 to 5?

It comes across as if the first bullet of this policy was considering office use [E(g)(i)]. However, E(g)(ii) and (iii) and B2 would be acceptable in employment designations but not in centres. The intention behind bullet 1 needs to be made clear.

4. *Village centres have already been identified at element 1 as locations for Use Class E. It is unclear why Use Class F2 is excluded from support here?*

As above, a specification/clarification of the appropriate E uses classes would be beneficial here. Not all E use classes would be appropriate in a village centre. Additional considerations would be the scale of proposals as well as the rural setting. Agreed, F2 should be included. There are also some SG uses that would be appropriate, like a launderette, a pub etc.

***Community Facilities***

The settlement boundaries map at page 24 are taken from the Medway Local Plan 2003 policies map. These are subject to review in the new Local Plan, and as the council does not have a five year housing land supply, are not considered as constraint policies in determining planning applications for housing.

We have sought further information from our Education Service. Officers have confirmed that there is pressure on school places in the Hoo and Chattenden area, and demand is forecast to outstrip the places available in local schools. The council, as the Local Education Authority, is working with local schools to explore options for expansions of existing schools. This continues on from expansions in recent years. Longer term new schools may be needed.

The council is updating the Infrastructure Delivery Plan for publication with the Regulation 19 Draft Local Plan. The current Hoo Peninsula Community Infrastructure Project is engaging with local communities in gathering more specific information on the capacity of existing facilities and services, identifying deficiencies and the needs for new and improved provision. The council recognises that the service base in the rural area of the Hoo Peninsula is limited, and residents often have to travel to neighbouring towns to access services.

**5. Housing**

We note and support your comments.

**6. Place and Heritage**

We support your comments and clarification on the status of the Design Code and the identification of local characteristics, and the scope of the local heritage policy.

**7. Landscape and Natural Environment**

The council has liaised with the Neighbourhood Planning group to identify the local definition on the location of the Chattenden Valley. This is provided with these comments. However we note your comment that the opportunity for additional mapping has now passed.

We note and support your wider comments.

**8. Travel Infrastructure**

We note and support your comments.

**9. Infrastructure**

We note and support your comments.