

**Hoo St Werburgh Neighbourhood Plan
Regulation 14
Consultation Statement V1.3**

**Hoo St Werburgh Parish Council
September 2023**

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1. Introduction

This Consultation Statement accompanies the submission of the Hoo St Werburgh Neighbourhood Plan (Date). It summarises the community engagement programme and the Regulation 14 consultation. It shows how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) have been satisfied.

2. Summary of Previous Community and Stakeholder Engagement

2.1 Community and Stakeholder Engagement Activities

Hoo St Werburgh Parish Council has worked with a steering group to prepare the Neighbourhood Plan and has engaged with residents and other stakeholders from the earliest stages of the process. Activities have included:

- Community engagement activities and events held in different areas of the Parish, in order to gain the views of local residents.
- Meetings held at various times of day at the local Church and the Village Halls in both Hoo and Chattenden.
- Stalls at the Hoo Marina Summer Fayre and Christmas Fayre and in the village square (Saturday) to speak to shoppers.
- Schools events, including the local primary school provided written and illustrative feedback and a stand being set up at the local secondary school during a year 7 open evening.
- Contact with local businesses and landowners.
- A leaflet delivered to every dwelling in Hoo.
- The Plan being also publicised in the local village magazine.

2.2 Key Issues

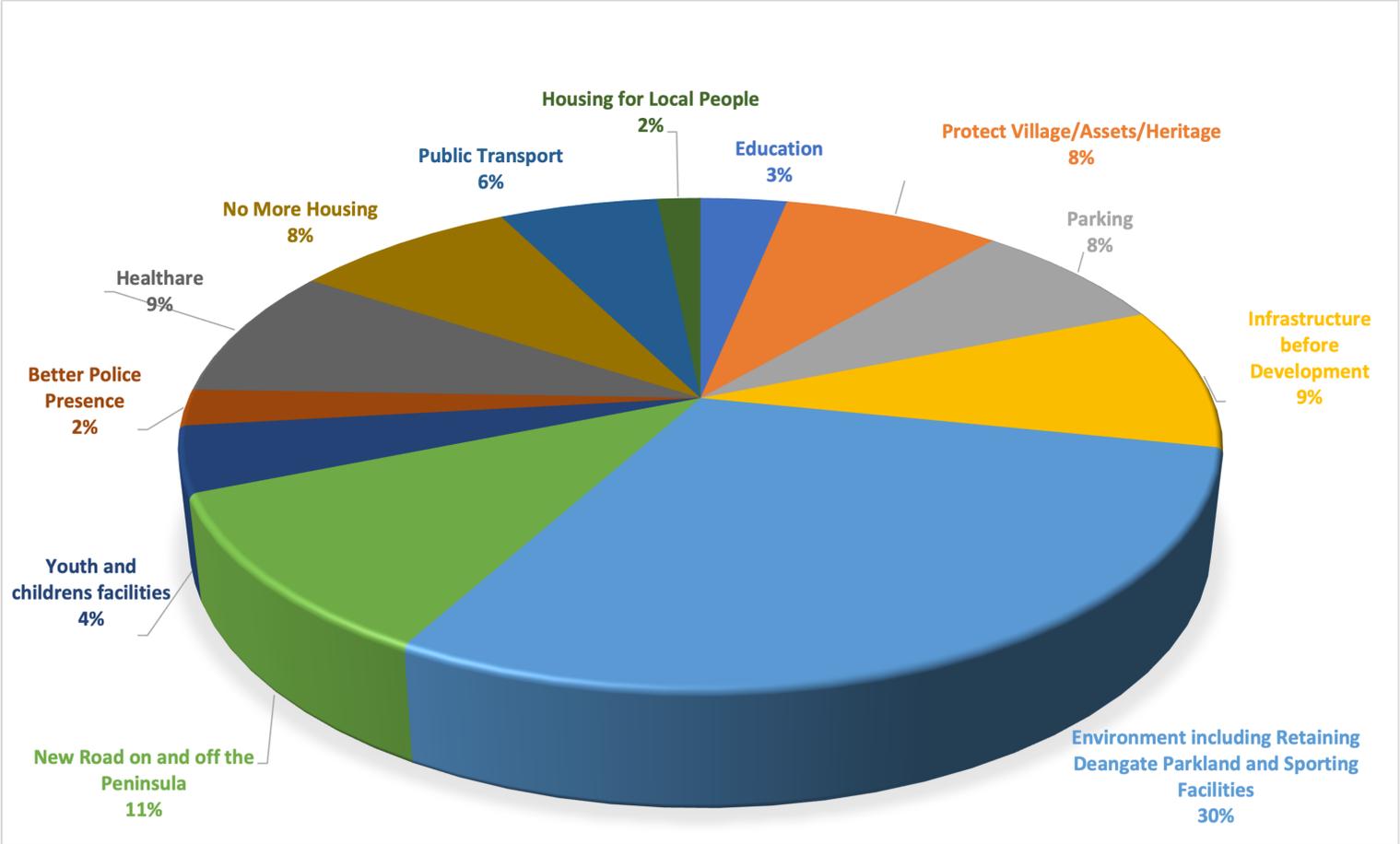
The main concerns for residents included:

- The local environment, including open space, wildlife and air quality.
- Housing requirements, including for first time buyers, older people looking to downsize, and extended families.
- The need to keep and expand on local community facilities, including sports facilities, and health and educational facilities to deal with an expanding population.
- Infrastructure, including the need for a new road to link the Peninsula.
- Village heritage and character.
- Lack of parking provision in new development.
- The need for more play and recreational facilities for children and youth.

These issues informed the policies of the Neighbourhood Plan.

A number of non-planning matters were also raised, including concerns over policing and utilities. These comments have been brought to the attention of the relevant bodies.

The following diagram indicates the levels of concern over different issues, with a particular focus on environmental issues and community and transport infrastructure.



3. Pre-Submission Consultation (Regulation 14)

3.1 How the Public Consultation Was Undertaken

Publicity

The regulation 14 consultation was advertised on the Parish Council web site and in Village Voices (which is sent to every home). The Parish Council contacted schools and local organisations to inform them about the consultation. Notices were placed in the library, village hall, working men's club, church and on the parish notice board. Details of statutory consultees are given in 3.2.

Accessibility

Copies of the Neighbourhood Plan were placed in the library, Chat community centre, village café and Council Offices. A link was provided on the Facebook page and the Plan was made available on the Parish Council web site. People were invited to respond on-line or in written form.

Legal Compliance

The consultation has undertaken against the context of Regulation 14 of the The Neighbourhood Planning (General) Regulations 2012 and also consultation case law, including compliance with Gunning Principles. The Plan is at a 'formative stage', so capable of amendment. The Plan was made available, with supporting information, to allow 'intelligent consideration'. The consultation as open for six weeks, so allowed 'adequate time for consideration and response'. Representations made have been given 'conscientious consideration', as set out in the fourth section of this statement.

3.2 Statutory Consultees

Details of the statutory bodies that were consulted. These are listed in the following table.

Organisation	Response received?
Rochester Airport Ltd	No
Medway Council (Conservation)	Yes, see below
Medway Council (Landscaping)	Yes, see below
Medway Council (Urban Design)	Yes, see below
Medway Council (Arboriculture)	Yes, see below
Medway Council (Flood Drainage)	Yes, see below
Medway Council (Integrated transport)	Yes, see below
Medway Council (Environmental Protection)	Yes, see below
Medway Council (Public Footpaths)	Yes, see below
Medway Council (Policy Development)	Yes, see below
Medway Council (Economic Development)	Yes, see below
Medway Council (Public Health)	Yes,, see below
Medway Council (Affordable Housing)	Yes, see below
Medway Council (Heritage)	Yes, see below
Medway Council (Youth Services)	Yes, see below
Medway Council (Chatham World Heritage)	Yes, see below
Medway Council (Social Regeneration)	Yes, see below
Medway Council (Library services)	Yes, see below
Medway Council (Waste Minimisation Team)	Yes, see below
Medway Council (Sport, Leisure and Tourism)	Yes, see below
Medway Council (Economic Development)	Yes, see below
Medway Council (Greenspaces)	Yes, see below
Medway Council (Education, Schools)	Yes, see below
Medway Council (Public Health)	Yes, see below

Kent County Council (Archaeological Officer)	No
Chatham Maritime Trust	No
Mid Kent Panning Services	No
Tonbridge & Malling Borough Council	No
Gravesham Borough Council	No
NHS Medway CCG	No
EDF Energy	No
Southern Gas Networks	No
Southern Water Services	Yes, see below
Highway Agency	No
Environment Agency	Yes, see below
Historic England	No
Natural England	Yes, see below
RSPB	Yes, see below
Kent Wildlife Trust	No
Medway Fire Service	No
Health & Safety Executive	No
Rural Planning	No
National Planning Casework	No
National Grid	No
Network Rail	No
Peel Ports	No
Sports England	Yes, see below
Kent County Constabulary	No
Kent Downs	No
Marine Management Organisation	No
Planning Gateway One	No
NHS CCG	No
Society for Protection Ancient Buildings	No

The Victorian Society	No
Historic Buildings & Places	No
The Twentieth Century Society	No
Council for British Archaeology	No
The Georgian Group	No
Cliffe & Cliffe Woods Parish Council	No
Frindsbury Extra Parish Council	No
High Halstow Parish Council	Yes, see below
Stoke Parish Council	No
Barton Willmore	No
Dean Lewis Estates (Hoo Consortium)	Yes, see below
Lichfields	No
Gladman (Hoo Consortium)	Yes, see below
Taylor Wimpey (Hoo Consortium)	Yes, see below
Redrow	No
Church of England (Hoo Consortium)	Yes, see below

3.3 Outcomes

Part 4 of this statement summarises representations made and describes how issues and concerns have been considered and where relevant, addressed in modifications to the proposed Neighbourhood Plan.

4. Responses to Representations

4.1 Analysis of Representations

The following tables summarise representations, together with the Parish Council's response.

4.2 Organisational Representations

Ref.	Page No.	Policy/ Site Ref.	Representation	Response
Medway Council				
			It is not clear to what extent the plan has been informed by engagement with businesses, key services, such as health, education, transport and leisure, and environmental groups such as RSPB, Kent Wildlife Trust that have significant interests in the area. In terms of employment has the local business community been involved and inputted to the NP? The two policies are not particularly locally specific or detailed. What are the needs of local businesses.? Could certain sectors be supported for growth for example and this be included in a policy? Is there potential to create business opportunities via the NP?	The Parish Council approached and engaged with a range of stakeholders including businesses, local services, health bodies, schools, consultants/developers, environmental groups, Homes England, and the local authority. This included in-person meetings. This was essential in informing the content of the Plan. Reference to this has been added to the engagement section of the plan (2.2).
			The submission version of the materials to Medway Council need to meet accessibility standards for online documents.	Documents adjusted to meet accessibility standards.
			There are a number of references in the draft NP to the Medway Local Plan, 2003 policies being somewhat out-of-date given the age of the plan. This is accurate, but it should also be noted that the majority of	Where references are made to the adopted Local Plan, text adjusted as suggested.

			the policies are consistent with the NPPF, and have been recognised as such by a number of planning inspectors in appeal cases.	
			It may be appropriate to change the Hoo and Chattenden NP plan period to 2040 to align with the Medway Local Plan. This was a recommendation from the Cliffe and Cliffe Woods NP examiner.	Date changed, as suggested.
			The draft NP clearly states that it is not seeking to allocate development sites – provision for growth in the parish will be addressed in the forthcoming Medway Local Plan. The council understands this position, but there are questions on how the NP can perform as part of the Development Plan for Medway, in advance of greater certainty on the spatial strategy and the scale of growth that the parish may experience by 2040.	<p>The way in which the Neighbourhood Plan will function as part of the Statutory Development Plan is set out clearly in legislation, the NPPF and Planning Practice Guidance. It is understood that the spatial strategy for growth will continually change as national and local plan policy is reviewed. This is always the case.</p> <p>The Parish Council will continue to make representations to seek to influence future local plan policy.</p>
			The council questions the purpose and objectives of the draft NP in advance of the Medway Local Plan.	Medway is vague on the nature of these questions. The vision and aims of the Neighbourhood Plan fully reflect NPPF policies. The legal requirement (Basic Condition) relating to local policy refers to the adopted Local Plan. However, the evidence base underpinning the emerging Local Plan forms part of the evidence base for the Neighbourhood Plan and has been taken into account, where relevant.

			<p>Some of the policies, such as H004, and in conjunction with H008 appear to minimise residential development. The draft NP provides very limited locations in which housing development would be supported, so the enabling aspect of the policy is constrained.</p> <p>This questions the objective of the NP in planning positively to support local development. If planning applications come forward in advance of the Local Plan, what would be the objectives sought through the NP?</p>	<p>There is no compulsion for a Neighbourhood Plan to make site allocations and no requirement for a Neighbourhood Plan to be delayed due to an emerging Local Plan.</p> <p>Policy H004 makes explicit reference to strategic site allocations. In addition, it identifies other locations where residential development will be supported. It is unclear how this would minimise residential development. Policy H008 deals with the natural environment and reflects NPPF policies, also taking account of wider environmental legislation. Similar policies to both of these have been through examination and are now part of made plans in other areas.</p> <p>The Plan has been written to meet the Basic Conditions, including having regard to national policy and guidance. If a planning application is received at the examination stage or after, the Neighbourhood Plan would be a material consideration. The vision and aims of the Neighbourhood Plan are stated in chapter 3.</p>
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			<p>There is a risk that emphasising the village identity of Hoo underplays the importance of securing a better range of services locally which could avoid residents having to travel further or buy online, adding to traffic and taking spend out of the local area. The NP is clear about the importance of the rural context for Hoo St Werburgh and Chattenden, the strong links to the wider countryside and estuary. However there should be an opportunity to acknowledge the size of the parish, and the associated needs for services and facilities, whilst noting its rural location.</p>	<p>Policy HOO2 seeks to expand the range of local community facilities, to meet local need.</p>
			<p>The vision of the plan recognises the distinctiveness and separation between Hoo St Werburgh and (the two areas of) Chattenden. However much of the content in the ‘evidence and planning rationale’ in the topic-based chapters does not provide detail on their differences and distinctiveness. For example, Chattenden has a smaller range of services and does not have a defined centre, in the same way as Hoo. This lack of services and a defined centre may create different needs or opportunities in Chattenden, than the larger community in Hoo.</p>	<p>Planning rationale amended to make clearer the distinctive identity and importance of the landscape separation.</p>
			<p>The council has identified a number of evidence base documents, policies and reports, which may be helpful as context to the draft NP, for example on heritage and design standards. The council can also offer to provide additional mapping in some sections of the plan, if that would be helpful. There is a general point that the draft NP has been prepared whilst the 2021 Census data has been released in tranches, and hopefully there will be additional updates released before the submission of the NP to Medway Council for publication. A number of generalised comments are made in the NP, such as employment patterns in the parish, where the information source is unclear. If the parish council would like to discuss sourcing further information, the council will seek to support these requests.</p>	<p>References to additional documents added. Offer of additional mapping welcomed.</p> <p>The Plan has been updated to include 2021 census.</p>

			It is clear that this document (design code) was drafted much earlier than the Regulation 14 draft NP. Therefore some of the contextual information, such as the Medway Local Plan, planning applications and the HIF programme are now out of date.	Comment noted. The design code is an evidence document and has informed the content of various policies. Whilst we recognise that parts of the design code document are out of date, the Neighbourhood Plan itself reflects the current position.
		Section 1	It would be useful to note the range of local groups involved in the Consultation Statement when submitting the draft plan.	Comment noted. This Consultation Statement has been prepared to meet the requirements of Regulation 15.
		Section 1	It may be appropriate to change the plan period to 2040 to align with the Medway Local Plan. This was a recommendation from the Cliffe and Cliffe Woods NP examiner.	Date changed, as suggested.
		Section 2	<p>Would it be useful in this section to draw out the distinction and separation between Hoo and Chattenden? A key policy aim is to recognise the separate settlements. Perhaps just add a sentence or two describing the parish, and the main village, and hamlets.</p> <p>Update to 2021, in line with Table 1. As you now have more up to date information, the latter sentences in this paragraph may need editing.</p> <p>Typo in History section</p> <p>Page 10 - note that some 2021 Census information has been included, and there may be more recent datasets available in preparing the reg 16 draft plan. It would be good to use the most up to date information.</p>	<p>Planning rationale amended to make clearer the distinctive identity and importance of the landscape separation.</p> <p>Census data has been updated to 2021.</p> <p>It is unclear what this refers to, but any remaining typo could be corrected at the examination stage.</p> <p>Census data has been updated to 2021.</p>

			This was a recommendation of the examiner for the Cliffe and Cliffe Woods NP.	
	Pg 11		<p>There are opportunities to say more about the range of activities carried out, and over what timescale in the Consultation Report. This would give a clearer indication of how local people, groups and businesses were involved in the preparation of the plan.</p> <p>Page 12 (pie chart) - It would be useful to understand the size of the survey group behind this diagram. The Consultation Report could provide more information on the numbers of responses and how the comments were gathered.</p>	<p>Section 2.2 on page 11 has been expanded as suggested to include stakeholder engagement. In addition, this Consultation Statement includes a summary of engagement throughout the Plan preparation process.</p> <p>A caption has been added to explain the pie chart.</p>
	Pg 13		<p>There is an updated Local Development Scheme (LDS) from October 2022.</p> <p>The annual Local Housing Need is now 1667 homes (updated March 2023).</p> <p>Would it be useful to include any mapping showing how existing facilities/village and other neighbourhood centres relate to 15 minutes walking distance? Medway Council could help with this mapping.</p>	<p>Amended date to October 2022.</p> <p>Amended date to March 2023 and figure to 1667.</p> <p>The Neighbourhood Plan does promote active and sustainable travel. However, it is a rural community, so it is recognised that there are limitations compared to urban areas (as recognised in the NPPF).</p>
		Section 3	There is a tension between retaining references to Hoo as a village and not acknowledging the scale of population, over 12,000 people in the parish. The local facilities should cater for that size of community.	The population figure relates to the entire parish. Hoo village has the largest concentration of population,

			Settlements over 10,000 population are not generally categorised as villages. There are two distinct parts to Chattenden - north and south of the A228 - is this one or two hamlets?	but accounts for part of the population figure only. Importantly, the local community consider Hoo to be a village. For clarity, the vision and aims have been amended to make reference to the parish in addition to the village and hamlets. Wording amended to describe Chattenden as a hamlet.
		3.2 A	Is there sufficient information in the Design Guidance to give clarity to developers on defining distinctiveness?	This is dealt with in policies HOO1, HOO6, HOO7, HOO8 and HOO9.
		3.2 C	Would it be appropriate to mention, 'reducing the need to travel'?	Aims C and F address this. The Plan promotes more sustainable live work patterns in various places.
		3.2 D	This could be widened to include reference to people with disabilities, and other demographics?	'For all age ranges' delated so not to limit the scope of the aim.
		3.2 E	Conserve rather than 'preserve'?	The word 'preserve' relates to the special statutory duties for heritage and the statutory definition for Conservation Areas.
		Section 4	Should this be centres, or is this specifically for Hoo village centre?	The purpose has been re-ordered for clarity, Word 'Centre' changed to 'Centres'.
	Pg 18		"The emerging Local Plan also deals with economic development, rural economy and high streets, but even these now need to be updated" – Noted that this is the focus of work on the draft Local Plan.	Comment noted.

	Pg 18		<p>Page 18, 6th paragraph: Is this making reference to the Local Plan chapter 4 and 6?</p> <p>E class use class order includes a variety of uses some of which may not be appropriate for centres and definitely some which may not be appropriate for a centre in a rural location. In particular E(g)(ii) and E(g)(iii) may not be appropriate. In some cases E(d) may be more appropriate nearby rather than in the centre.</p>	<p>Subheadings added for clarity.</p> <p>The Parish Council shares concerns over the wide scope of use class E. However, government has made the decision to introduce the new use class E, so changes of use to other use class E would not require planning permission. The rationale already states that <i>“The local planning authority would need to decide whether conditions were necessary to restrict activities or hours in the interests of protecting amenity.”</i></p>
	Pg 19		<p>This section does not say much about Chattenden and its facilities, but some of the services are mixed into the longer list. The listing order could be reviewed, with village hall, educational and health facilities ahead of petrol stations for example. This policy area doesn’t seem to suggest there is a need for upgrade even though the aims/vision refers to enhancing local facilities. Detail on where there are short falls in facilities would be helpful in framing the policy.</p>	<p>The list does describe where certain facilities are, but reflects facilities across the parish. It is not the intention to make judgements on the relative importance of facilities through their order on the list. Policy wording amended to recognise enhancement or diversification of existing facilities. Chapter 2 amended to recognise shortfall or health and educational and transport infrastructure.</p>
	Pg 20		<p>Medway Council has produced work in the Hoo Development Framework consultation draft that shows current access to services</p>	<p>Some of the maps have been updated.</p>

			within 15 minutes walking distance. We are happy to share the mapping/graphic if helpful.	
		HOO1	1a. Are the centres defined in the NP, or will they follow the Medway Local Plan?	Maps amended.
		HOO1- HOO4	Economic Development support recognition of the main established employment areas and opportunities for local use retail/community in the villages.	Comment noted.
		HOO2	<p>Policy HOO2.1.a – how do you define sufficient and how would you expect that to be demonstrated? It is open to interpretation unless made explicit.</p> <p>Policy HOO2.2 – what about community facilities that comes forward with new development?</p> <p>2. How would this policy (<i>located near to existing built settlements and housing areas</i>) apply to development of recreation facilities at Deangate?</p> <p>3. Are these as listed on page 19? There are some businesses that you may not consider to be community facilities?</p>	<p>This would be a judgement for Kent County Council Highways department.</p> <p>If this comment relates to strategic site allocations, we expect the Local Plan to set requirements for supporting community facilities. The Neighbourhood Plan can't pre-empt potential future strategic site allocations.</p> <p>Deangate is now identified in the rationale as an existing community facilities. HOO2 amended to make explicit reference to enhancement or diversification of existing facilities.</p> <p>Interpretation amended to refer to community facilities listed on pages 19 and 20.</p>

	Pg 26		<i>'but as a generalisation would be less than one kilometre'</i> - Does this mean 1km from the existing site? The community facilities listed would have different scales of 'catchments'; ie a health or sports centre would likely draw from across the whole parish, and a 1km walking distance may not be appropriate, or the new location may be closer to a bigger proportion of the population.	Reference to walking distance deleted from the interpretation.
		HOO3	<p>Policy HOO3.1 – these locations can also be home to some E(g) uses like E(g)(ii) and E(g)(iii)</p> <p>Policy HOO3.2.a – again reference is made to sufficient capacity of highways.</p> <p>2. Would it be helpful to make reference to no significant adverse impact on the natural environment, given the proximity of the sites to the Medway Estuary environmental designations?</p>	<p>The policy specifically relates to B2 and B8 uses. However, it would not preclude certain E use class activities in the named locations.</p> <p>This would be a judgement for Kent County Council Highways department.</p> <p>HOO1, HOO2 and HOO3 modified for consistency all policies now refer to impacts on residential amenity impact of historic environment and natural environment.</p>
	Pg 30		Aerial view of Hoo – Typo	Typo corrected.
	Pg 31	Section 5	“Currently, based on the Medway Strategic Housing Land Availability Assessment process thirty-two sites were submitted for consideration for development” - This section/reference can be updated for the submission draft NP. The plan should clarify references to the Medway LP, 2003, evidence base work, such as the Land Availability Assessment, and information which will be published with the new draft local plan.	Reference to 32 sites added to rationale.

			There is more information available in the Strategic Housing Needs Assessment by area in terms of housing need by type and size for example.	Further extracts from HNA added to rationale.
	Pg 31		<i>Policy S14...</i> All policies in the Medway Local Plan, 2003 will be reviewed. This is currently a saved policy in the adopted LP.	Comment noted.
	Pg 32		<i>Para 4</i> - Is this referring to Hoo village centre specifically? Any consideration of Chattenden? <i>Future development needs to have cohesion and connectivity to ensure there is a sense of place throughout the village</i> - Is this an area for the NP or Design Code to provide more guidance on what is needed for good connectivity?	Text amended to refer to the parish. This is addressed in Policies HOO6 and HOO11.
	Pg 33	HOO4	1c. Suggest add text: 'and can provide satisfactory residential standards' 2c. This excludes development on higher quality agricultural land 3. Suggest add: or other specialist housing needs 4. This is a good principle, but can often be challenging to deliver, and there may be a justified need for off-site contributions. The policy should recognise the need for flexibility in specific circumstances. This seems to be noted in point 5, so maybe some minor wording changes in point 4 would clarify	Suggested text added to the policy. Proviso on loss of the best and most versatile agricultural land added. Reference to other specialist needs added. Clauses 4 and 5 merged, for clarity.
	Pg 33		Enabling policy - It is noted that the NP provides very limited locations in which housing development would be supported, and relies on the Medway LP to provide allocations, so the enabling aspect of the policy is constrained.	A neighbourhood plan is not required to provide housing site allocations and can leave this to the Local Plan. The policy explicitly recognises allocated sites and then describes

			Policy HOO4 – seeks to prevent housing in other areas other than those listed under 1. This does not accord with national policy or the Local Plan. Considerations could follow a priority order where greenfield is considered last, but cannot be excluded deliberately given the pressure for housing delivery, but will bring vital infrastructure needed.	additional sustainable locations for development. This clearly accords with national policy. This comment appears to promote development anywhere, which would not accord with national policy.
	Pg 34		First Homes- Would it be helpful to include a link to the MC position statement?	The interpretation makes reference to the position statement.
	Pg 35	HOO5	HOO5: 3b. Is this feasible, eg with a flat above a shop?. Would EV charging points for EV bikes work with shared storage?	Clarification added to the interpretation, suggesting a more flexible approach for conversions.
			Pg 35- The policy also seems to require EV charging for cycles in the storage facility, but this is not mentioned in the interpretation, just storage.	Wording amended for clarity and consistency.
	Pg 38		The NP clearly highlights the importance of the military heritage in Hoo, but there is scope to acknowledge the wider archaeological and historic environment interests and assets. Perhaps include a reference to the Hoo Peninsula Historic Landscape Report? https://historicengland.org.uk/research/current/discover-and-understand/rural-heritage/hoo-peninsula/	Reference to the Historic England report added to the rationale. The policy deals with specific aspects of heritage, but avoids unnecessary repetition of nation policy.
	Pg 38		Add link to report or reference in appendix.	As above.
		HOO6	It is noted that many aspects of this policy align with the principles for design of the built environment in the consultation draft Hoo Development Framework. The council welcomes shared ambitions for quality and sustainable design.	Comment noted. The Parish Council provided feedback on the draft Hoo Development Framework.
	Pg 41		Could also reference other MC policy and guidance documents, such as Air Quality Planning Guidance.	Policy HOO10 deals with air quality. Reference to Medway guidance

				added to interpretation of HOO10.
	Pg 39		Support reference to incorporating positive design features to reduce carbon use, support biodiversity and address climate change, local and recycled materials, and water permeable ground surface materials	Comment noted.
	Pg 40		Interpretation includes some of the suggested design features to reduce carbon usage	Comment noted.
		HOO7	Similar point as above - scope to acknowledge the wider heritage interests in the parish, eg industrial heritage.	Reference to 'industrial' added to the policy.
		HOO7	<p>Comments from Conservation Officer</p> <p>We have no concerns with the preamble to the 'HOO7: Local Heritage' policy other than that we feel it slightly misses an opportunity to better define Hoo's heritage significance and identify individual features and structures, with the current policy focussed on the Hoo Stop Line.</p> <p>Current legislation, the NPPF, and the Local Plan (both current and emerging) provide varying levels of requirements for the consideration of the historic environment in planning decision making. To complement this broader level of protection, the Hoo Neighbourhood Plan provides the opportunity for particularly tailored policies for the protection and enhancement of the heritage significance specific to Hoo.</p> <p>Historic England published a series of Historic Area Assessments for the other Parishes on the Hoo Peninsula, but for one reason or another, Hoo was not included. These Assessments provide a great deal of insight into the history and heritage significance of each</p>	<p>It is unclear what specific heritage assets are being referred to. The historic environment record describes local heritage assets.</p> <p>Policy HOO7 has been drafted to address specific local issues.</p> <p>The Parish Council would support this. Such an assessment could form part of the evidence base for a future plan.</p>

		<p>parish, and the preparation of a similar assessment for Hoo would be of great benefit to the production of a Neighbourhood Plan, in-turn enabling the creation of focussed policies designed to protect and enhance Hoo’s heritage. A Historic Area Assessment provides the opportunity to both take a more strategic approach to the protection and enhancement of the historic environment, as well as producing specific policies that relate to particular assets, features, or typologies. The NHP group will also be able to define additional particular features and structures that they feel could be considered ‘Non-Designated Heritage Assets’ (NDHA) to those already identified on page 46 or features that contribute to the overall character of the NHP area; and may even identify other assets that require a greater level of protection, such as Listing or Scheduling.</p> <p>Alongside specific policies for the protection of the heritage significance of NDHA (such as their alteration, demolition, or development within their setting), the NHP could then include policies for their enhancement too – such as in the case of the Hoo Stop Line, means of interpretation, understanding, for example. Such enhancement policies could then tie into wider initiatives and projects for the Hoo Peninsula, or Medway.</p>	<p>All three clauses already make reference to enhancement. The suggested additions sound like projects rather than planning policy for development.</p>
	Pg 41	<p>Potentially unclear on the wording “The Hoo St Werburgh Design Codes document prepared by AECOM may be useful in securing compliance with the policy.”</p> <p>Does the language used within the interpretation section of the Neighbourhood Plan need to be more explicit in terms of the specific criteria against which planning proposals will be judged. This is a general comment against each of the policy areas (see previous comments against pgs. 39, 40, 50, 51).</p>	<p>The Design Codes document is an evidence document which has informed the policies.</p> <p>The interpretation should not set additional policy requirements.</p>

			<p>There could be scope to make reference to design features supporting wildlife that reflect the habitats and key species of the parish.</p> <p>Landscape character - what is the evidence base/reference for landscape policy?</p>	<p>The interpretation gives examples of wildlife features.</p> <p>The preceding rationale to the policy describes the evidence base. In addition, the various clauses relate to the specific features and landscape designations in the area.</p>
	Pg 54	HOO9	HOO9 2 (<i>take opportunities...</i>)- Does this need to be clarified, eg 'where appropriate'. Would this policy apply to a householder development not in proximity to a LGS?	The policy applies to development affecting LGS and this is also clarified in the interpretation.
	Pg 57	HOO10	Opportunity to reference MC Air Quality Planning Guidance and AQMA management plan.	Reference to planning guidance added to the interpretation.
	Pg 60	Section 8	<p><i>Relevant evidence on transport....</i>Is there some text missing here?</p> <p>Would be useful to mention Medway Rights of Way Improvement Plan: https://www.medway.gov.uk/downloads/file/5531/medway_rights_of_way_improvement_plan_2020_to_2030</p>	<p>Redundant text deleted.</p> <p>Reference to document added to rationale.</p>
	Pg 61		"The Peninsula Way is the only access road"- perhaps clarify term - it is a dual carriageway and an important part of the local highways network.	Client to clarify.
	Pg 63	HOO11	More consideration must be given to sustainable travel i.e. buses, car club/shares etc. Parking for private vehicles seems to be given some level of priority.	The rationale and the policy already address sustainable and active travel, including in four of the policy clauses. In addition, the policy cross-references to HOO6, which places

			<p>Could the plan seek to require contributions from developers to deliver infrastructure?</p>	<p>emphasis on pedestrian permeability and connectivity.</p> <p>Sustainable transport and active travel added to infrastructure priorities in Chapter 9.</p>
		HOO11	<p>HOO11 2 - note that this is not consistent with HOO5 3b, suggesting that is not intended that all cycle parking must include electric charging points. There is also a variation in policy wording. HOO5 3 states 'must', and HOO11 2 states 'should', but the policy areas are the same.</p> <p>Para 6 - perhaps could also mention provide safe and attractive walking routes.</p>	<p>Clauses in HOO11 amended to be consistent with HOO5. Wording in HOO5 amended to 'should'.</p> <p>Reference to 'safe and attractive' added to policy and interpretation.</p>
		HOO12	<p>Should this be blank?</p> <p>Given the proximity of the coastal path to the SPA/Ramsar designation, it may be useful to note the need to promote sensitive access, recognising the potential for bird disturbance, eg from dogs off leads.</p>	<p>Comment unclear.</p> <p>Sentence added to interpretation.</p>
	Pg 67		<p>List of Footpaths - would you like a map showing the location of the footpaths in the parish? Notations of the path numbers may be hard to read on a map, but it could show the extent of the network and illustrate the gaps mentioned in the evidence and planning rationale.</p>	<p>Footpaths plan substituted.</p>
		General comments	<p>The aims and objectives are clear but that the detail on the policies and interpretation doesn't match that clarity. The policies seem to focus on protecting Hoo St Werburgh as is, rather than looking to future opportunities. There is scope for the plan to be more ambitious and locally specific based on identified local need.</p>	<p>HOO1, HOO2, HOO3, HOO4 all deal with growth. HOO5 and HOO6 deal with standards of development. HOO7, HOO8, HOO9 and HOO10 deals with environment. HOO11 and</p>

				HOO12 deal with infrastructure. The plan creates a balance between growth, environment and sustainability.
			<p>Importance of people – plans general consider buildings and not people so there could be more of a focus on the people especially as Hoo is an area of visitor interest, as well as catering for residents. It is important to capture understanding of the people and (existing and new residents)</p> <p>Important to take a focus on how we recognise history and heritage as part of new development and how its reflected in architecture, infrastructure, active transport and how it brings people together and aids community cohesion.</p>	<p>The Neighbourhood Plan is very strong in this respect, with a clear 'people' focus.</p> <p>The Plan deals with heritage as an integral part of the wide social, economic and environmental planning of the area.</p>
			Need to provide narrative about why there is a need for particular uses and how it serves the community.	It is unclear which policies this comment applies to. The rationales to the policy provide justification.

Name	Page No.	Policy/ Site Ref.	Representation	Response
Homes England				
		Sites	Homes England is the freehold owner of the majority of the former MoD Chattenden site. The redevelopment of these parcels will be well-designed and sustainable, responding to local development needs, and will make a positive contribution to the local community whilst minimising the environmental impact in accordance with the objectives outlined in Homes England’s Strategic Plan.	Comment noted. Reference to Homes England’s land holdings added to the rationales in Chapters 4 and 5.
		Sites	<p>Government guidance contained within “Planning Practice Guidance” considers the relationship between adopted Local Plans and Neighbourhood Plans.: The guidance confirms that Neighbourhood Plans; “should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.” NPPG Paragraph: 070 Reference ID: 41-070-20190509. The above sets up a nuanced relationship between the adopted Local Plan and the emerging Neighbourhood Plan. The Neighbourhood Plan should reflect the provisions of the adopted Local Plan and should not compromise its strategic objectives. However, because the adopted Local Plan is out of date, the Neighbourhood Plan should only reflect strategic Local Plan policies to the extent that they accord with the provisions of the NPPF.</p> <p>Accordingly, it is maintained that the Neighbourhood Plan should support, in principle, the allocation of appropriate previously developed sites within the former Ministry of Defence Estate, Chattenden now Homes England’s Landholdings, i.e. the land at Lodge Hill Camp and Chattenden Barracks.</p>	<p>The Neighbourhood Plan has had regard to this and other national policies and guidance.</p> <p>Reference to Homes England’s land holdings added to the rationales in Chapters 4 and 5.</p> <p>The Neighbourhood Plan seeks to shape development and ensure that it is sustainable, but not to undermine strategic site allocations in the adopted Local Plan.</p>
		Sites	Homes England’s land at Chattenden Barracks and Lodge Hill Camp offer the opportunity to meet local development needs. Given their previously developed nature coupled with their sustainable location,	The Neighbourhood Plan makes reference to Local Plan Policy S14 of the Local Plan. Policy HOO4 explicitly

			we conclude that these land parcels represent a logical and sustainable location for development within the Neighbourhood Plan area. The sites can be identified and allocated in the Neighbourhood Plan without risk or prejudice to a new version of the Local Plan brought forward by the Council in due course.	refers to allocated sites in the Local Plan.
		Sites	<p>The HSW&CNP sets out the local community’s aspirations for the Hoo St Werburgh Parish over the period to 2038. This differs from the period proposed to be covered by the emerging Medway Local Plan. The Local Plan is expected to guide the development and use of land in Medway up to 2040.</p> <p>We suggest that two new policies be added that allocate Chattenden Barracks (Appendix 2) and Lodge Hill Camp (Appendix 3) for development. Suggested wording for the two policies is as follows:</p> <p>“HOOXXX: Chattenden Barracks – Land at the former Chattenden Barracks site is allocated for up to 500 new homes and associated infrastructure.”</p> <p>“HOOXXX: Lodge Hill Camp – Circa 9 hectares of land at the former Lodge Hill Camp site is allocated for a range of uses including employment (Use Classes E; B2, B8, C2, F1 and F2 and waste management) and residential uses (C2 and C3). Other uses, which fall outside the use classes identified, may also be suitable, subject to satisfactory resolution of technical matters.”</p>	<p>There is no requirement for Neighbourhood Plans to use the same dates as Local Plans. However, the Plan has been amended to 2040 in response to another representations.</p> <p>Strategic site allocations would be best dealt with through the Local Plan review process, especially given the existing policies in the adopted Local Plan.</p> <p>Waste is an excluded matter for Neighbourhood Plans, so the suggested policy would be unlawful.</p> <p>Reference to Homes England’s land holdings added to the rationales in Chapters 4 and 5.</p>

				<p>It should also be noted that inclusion of new site allocation policies would not be possible at this stage of the process. Such additions would require the screening for full SEA/HRA to be repeated, possibly triggering need for full appraisal. The Regulation 14 Consultation would also need to be repeated.</p>
		HOO1	<p>The support for employment development, under Use Class E, on brownfield sites is welcomed. However, there is potential for other appropriate uses on Brownfield sites within this neighbourhood plan area. We therefore conclude that this policy, or other policies in the plan, should provide in principle support for other uses on Brownfield land, including Use Class B2, B8,, C2, F1 and F2. In light of this, it is suggested that criteria 1 be amended to: “Employment development (Use Class E and any other appropriate employment generating use class) will be supported in the following locations...”</p> <p>Further to the above, we believe that the Neighbourhood Plan should confirm Lodge Hill Camp as an appropriate opportunity for sustainable development and should be allocated for a range of uses, including employment. A proposed allocation is considered appropriate and could be introduced as highlighted at paragraph 4.4 of these representations.</p>	<p>Policy HOO1 already supports F1 uses in the villages centres. Policy HOO4 makes reference to brownfield sites for housing development, in addition to strategic sites. Policy HOO3 deals with Class B2 and B8 uses. It would not be appropriate to have blanket support B2 and B8 uses for all brownfield sites, due to amenity and environmental considerations.</p> <p>Strategic site allocations would be best dealt with through the Local Plan review process, especially given the existing policies in the adopted Local Plan.</p> <p>Reference to Homes England’s land holdings added to the rationales in Chapters 4 and 5.</p>

		HOO3	<p>Policy HOO3: Industrial and Distribution (Page 28) – supports industrial (B2) and distribution (B8) development in two, named, areas: Kingsnorth Employment Area and Hoo Marina Industrial Estate. The draft policy does not identify other circumstances in which industrial and/or distribution development may be acceptable. The NPPF obliges decision makers to make as much use as possible of previously-developed land. In relation to economic development NPPF paragraphs 81 – 85 seek to ensure that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. This means that planning policies should “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth and be flexible enough to accommodate needs not anticipated in the plan”.</p> <p>We conclude that Criterion 1 of this policy should therefore be amended to: “Industrial (B2) and distribution (B8) development will be supported on appropriate previously developed land and in the following industrial estates.”</p>	<p>The Policy seeks to support B2 and B8 uses in existing areas where suitable infrastructure is in place. Any planning application involving other locations would need to be considered on its merits, against the context of NPPF and Local Plan policy. It would not be appropriate to have blanket support B2 and B8 uses for all brownfield sites, due to amenity and environmental considerations. Also, such development could compromise wider housing and economic development goals.</p>
		HOO4	<p>Policy HOO4: Housing Growth and Mix (Page 33) – establishes policy support for housing in addition to strategic sites identified in the Local Plan. It states that housing will be supported in the following locations where there is no significant impact on existing amenity, historic, landscape or natural environments: “a) Infill development within existing built frontages; b) Brownfield sites; c) Upper floors in commercial properties, providing there is no resulting conflict with existing commercial uses; d) Conversion of agricultural buildings.”</p> <p>Chattenden Barracks is being promoted for residential development to provide up to 500 homes. Lodge Hill Camp is being promoted for a</p>	<p>Strategic site allocations would be best dealt with through the Local Plan review process, especially given the existing policies in the adopted Local Plan.</p> <p>See also previous response to the suggested site allocation policies.</p> <p>Reference to Homes England’s land holdings added to the rationales in Chapters 4 and 5.</p>

			<p>range of uses that could include residential. As previously mentioned, both these sites are brownfield in nature so this policy provides in principle support. The allocation of these two previously developed sites for development in the Neighbourhood Plan would offer strong policy support for development outside the overarching provisions of an up-to-date Local Plan.</p> <p>However, we conclude that this is entirely appropriate. The two sites are not “strategic” in scale, hence their development would not prejudice or inform strategic decisions on new growth in Medway. Furthermore, the two sites have been developed previously. A planning application for their development would benefit from the provisions of the NPPF and the need to significantly boost the supply of new housing regardless of an allocation. The allocation of the two sites would therefore be a positive, proactive, step that would bring “planning certainty” and would deliver much needed development in the area in the short term.</p>	
		HOO7	<p>In relation to part 1 of this draft policy, it is noted that the Hoo Stop Line was an important part of the WWII anti-invasion defences and contains designated as well as non-designated heritage elements, which likely form part of the setting of the designated structures. The wording “should preserve or enhance and cause no harm” appears to be inconsistent with the NPPF. Government guidance categories “harm” to heritage assets as “substantial” or “less than substantial”. In circumstances where “less than substantial” harm would arise, this must be outweighed by “public benefits”. The Neighbourhood Plan policy should reflect this.</p>	<p>It is unnecessary for Neighbourhood Plans to repeat NPPF policies. Indeed, the NPPF makes clear that neighbourhood plans should not do this. The policy seeks to raise specific local heritage issues, rather than unnecessarily repeating national policy.</p> <p>The words ‘preserve’ and ‘enhance’ reflect the wording in the Planning (Listed Buildings and Conservation Areas) Act 1990, which includes special statutory duties for specified heritage assets. The word ‘should’ is</p>

			<p>Part 2 of draft policy HOO7 relates to non-designated heritage assets. Paragraph 203 of the NPPF requires a balance judgement when considering the scale of any harm or loss and the significance of a non-designated heritage asset. Therefore “no significant adverse impacts” goes beyond the requirement of the NPPF and should be deleted.</p> <p>A more appropriate wording should be as follows: “2. Development should have no seek to avoid significant adverse impacts on non-designated heritage assets and their setting and should take opportunities to enhance them.”</p>	<p>included in relation to ‘harm’. Whilst there can be a balancing of harm against benefits, the special statutory duties would suggest that should not be the starting point (harm should be avoided where possible).</p> <p>The suggested wording is a little confused, but also would be likely to be inconsequential. The existing wording includes the word ‘should’ so would allow flexibility in its application, against the context of NPPF policy. However, the words ‘seek to’ have been added to the clause.</p>
		HOO8	<p>This policy appears to go beyond the scope of the National Planning Policy Framework (NPPF). The wording “must not harm” should be deleted as it is not in accordance with the NPPF. NPPF para 180 states: “a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;”</p> <p>In contrast the policy attempts to establish a complete embargo on any harm. The words “must not harm” should be removed or replaced with “must seek to avoid significant harm to” so that it is consistent with the NPPF.</p> <p>Criterion 3: We also note from the NPPG that “sufficient and proportionate evidence” should support the choices made and the</p>	<p>The word ‘must’ has been modified to ‘should’ throughout the policy.</p> <p>A new clause 2 has been added to reflect this hierarchy.</p> <p>The criteria has been amended to include ‘where supported by evidence’.</p>

			<p>approach taken. Criterion 3 should be deleted as the Parish Council has supplied no evidence to justify inclusion of this proposed criteria.</p> <p>4.28 As such we would propose the following amendments to ensure the policy is consistent with National Policy:</p> <p>“2. Development should take opportunities to enhance and should seek to avoid harm to:</p> <p>a) Designated sites, including Ramsar, SSSI and Special Protection Area;</p> <p>b) local woodlands, including ancient woodland;</p> <p>c) lakes, chalk streams and other water features.</p> <p>3. Development adjacent to the Ramsar, Special Protection Area, SSSI and other designation and protected landscapes should consider the inclusion of landscape buffer zones where supported by evidence to provide visual separation and avoid disturbance of habitats or adverse impacts on biodiversity.</p> <p>7. Landscape design and planting in development should consider the use of local native species or other species of high environmental value where appropriate.”</p>	<p>See above modifications.</p> <p>This suggested wording merely requires consideration, rather than setting clear requirements for development to meet. So the clause would be inconsequential and ineffective. Use of the word ‘should’ creates sufficient flexibility. It would be for the developer to justify why they had not done this.</p>
		HOO11	<p>We would suggest that a minor amendment is made to the wording of this policy as it is noted that not all roads within development schemes, particularly tertiary streets, would be appropriate for public transport.</p> <p>We suggest this should be changed to:</p> <p>“new roads should be of sufficient width for the easy passage of emergency vehicles, and where appropriate, public transport and service vehicles”</p>	<p>Wording amended to ‘... service vehicles and emergency vehicles and, where appropriate, public transport’.</p>
	Design Codes		<p>The draft Neighbourhood Plan is accompanied by a set of “design codes” prepared by consultants, AECOM, on behalf of the</p>	<p>The Plan already identified this as a key evidence document, which has</p>

		<p>Neighbourhood Plan preparation group. It is understood that this document will support the Neighbourhood Plan policies on design and provide a framework for the assessment of future development proposals. Further clarity is sought as to how the document will be applied in the latter case.</p> <p>Having reviewed the draft design code we note that some requirements, when considered cumulatively, could be restrictive in design terms and not necessarily representative of good placemaking or of local character. Specific points relate to the requirements for building heights, street types (sections and details), car parking and built form. We therefore request that these principles are applied flexibly to enable individual sites to respond to site specific considerations.</p> <p>There are 6 key themes for the design code with 27 design principles that should guide the design of developments. We note that “all” of the criteria will apply to Local Plan growth sites within the Neighbourhood Plan area. We provide below comments on specific design principles that may be applicable to development at Lodge Hill Camp and Chattenden Barracks.</p> <p>The representation includes various comments on the design code evidence document.</p>	<p>informed several of the policies. It is poor practice for policies to rely on external documents for their implementation, so key principles from the design code evidence have been drafted into the policies themselves. Some policy interpretations state that the design code document may be helpful in securing compliance with the policy.</p> <p>These comments relate to the evidence document, rather than the actual policies in the Neighbourhood Plan. The actual policies address their concerns.</p>
	LGS	<p>The draft Neighbourhood Plan is also accompanied by a Local Green Space Assessment, dated July 2022. Homes England have reviewed this document and do not have any comments to make on its content.</p>	<p>Comment noted.</p>
	Basic Conditions	<p>The NPPF establishes that Neighbourhood Plans should have regard to National Policies and advice contained in guidance issued by the Secretary of State. We have identified several instances in which the policies of the emerging Neighbourhood Plan establish policy tests for the determination of planning applications which are fundamentally</p>	<p>See above detailed responses, including those against HOO7 and HOO8. Necessary amendments have been made to meet the Basic</p>

			<p>different to those contained in the NPPF, for example (but not limited to) H007 and H008.</p> <p>We conclude that if these policies are not amended to accord with National Policy there is a significant prospect that the basic conditions will not be satisfied. Accordingly, we recommend that the highlighted policies be amended to ensure compliance.</p>	Condition relating to national policy and guidance.
	Basic Conditions		<p>National Planning Guidance establishes that Neighbourhood Plans must contribute to the achievement of sustainable patterns of development. We acknowledge that the Neighbourhood Plan achieves this objective in broad terms. However, we maintain that the Neighbourhood Plan, as currently drafted does not go as far as it could in this regard.</p> <p>We conclude that the Neighbourhood Plan could make specific reference to Homes England's land at Chattenden Barracks and Lodge Hill Camp being "previously developed" and capable of making a significant contribution to housing, employment and other development needs in the short term.</p> <p>Whilst we acknowledge that the Neighbourhood Plan refers to previously developed land it could deliver additional planning certainty by making specific reference to Homes England's land holdings.</p>	The Plan helps to achieve sustainable development without the suggested sit allocations. See also previous comments on the proposed site allocations.
	Basic Conditions		<p>It is a fundamental premise of Neighbourhood Plan making that the provisions of the plan should be in general conformity with the overarching Local Plan. However, in this instance, the overarching, adopted, development plan is out of date. The preparation of its replacement is at the early</p> <p>Saved Policy S14 of the adopted Medway Local Plan is unusual in that it seeks to discourage development on Homes England's land, pending the adoption of detailed advice in a subsequent incarnation of the Local Plan.</p>	<p>Strategic site allocations would be best dealt with through the Local Plan review process, especially given the existing policies in the adopted Local Plan.</p> <p>inclusion of new site allocation policies would not be possible at this stage of the process. Such additions would require the screening for full</p>

		<p>The policy was adopted prior to the designation of a significant part of HE's land as a SSSI. Accordingly, it has now been superseded by ecological and environmental constraints. Nevertheless, the policies acknowledgement that Homes England's land has been developed previously and can make a significant contribution to development needs in the future remains valid and merits further consideration in subsequent incarnations of the local policy.</p> <p>We conclude that the specific reference and allocation of Homes England's land at Chattenden Barrack and Lodge Hill Camp for development in the Neighbourhood Plan, as outlined in Section 4, would not conflict with strategic policies of the adopted Local Plan, because these have long since been superseded by changes in circumstances.</p>	<p>SEA/HRA to be repeated, possibly triggering need for full appraisal. The Regulation 14 Consultation would also need to be repeated.</p> <p>The suggested site allocations could create difficulties in terms of general conformity with strategic policies in the adopted Local Plan.</p>
	General	<p>In summary, we conclude that the emerging neighbourhood plan takes a positive and proactive approach to development. We maintain that with some appropriate modifications it can establish a robust framework against which planning applications, including for the redevelopment of Homes England's land can be assessed. We would welcome the opportunity to work collaboratively with the Neighbourhood Planning Group to explore and develop the proposals for Homes England's land at Chattenden Barracks and Lodge Hill Camp in further detail.</p>	<p>Comment noted. The Parish Council would welcome the opportunity to engage with Homes England, other developers and Medway Council over any future development proposals.</p>

Name	Page No.	Policy/ Site Ref.	Representation	Response
National Highways				
	Roads		Responsible for the strategic Road Network (SRN), in this case the M2 and A2 in the vicinity of the area covered by the Plan. Given the distance of the Plan area from the SRN (over 5 miles from M2 junction 1) and the fact that the Plan does not allocate sites for development, we are satisfied that the Ho St Werburgh and Chattenden Neighbourhood Plan would not have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN. Our formal response to this consultation is No Objection.	Comments noted.

Name	Page No.	Policy/ Site Ref.	Representation	Response
Natural England				
	General		No specific commence. Guidelines attached on Neighbourhood planning and the natural environment: information, issues and opportunities.	Comment and guidelines noted.

Name	Page No.	Policy/ Site Ref.	Representation	Response
Southern Water				
		H006	<p>H006: Design We would support the inclusion of water efficiency targets and SuDS in this policy. Although the Design Principles contained in the Design Guide for the Neighbourhood Plan are positive regarding the need to include sustainable drainage measures within all development, we could find no aligning policy wording within the Plan. Nor could we find any water efficiency targets.</p>	<p>The aligning policy wording in H006 is “Development should incorporate positive design features to reduce carbon use, support biodiversity and address climate change”. The interpretation provides guidance on how this can be achieved.</p>
	Water Efficiency		<p>Regarding water efficiency; The south east is classified as an area of ‘serious water stress’, and a variety of factors such as an increasing need to limit surface and groundwater abstractions, increase drought resilience, meet the needs of a growing population and adapt to climate change, all combine to present both challenges and opportunities to change the way we manage water. Whilst tackling this challenge will require a multi-faceted approach, there is an opportunity for all levels of the planning system to play their part, by ensuring through policy that new development is required to meet higher standards of water efficiency. High standards of water efficiency in new developments equate to greater long-term sustainability – with the potential to delay or reduce the need to increase abstraction or find new water resources. We therefore recommend as a minimum the tighter Building Regulations optional standard for water efficiency of 110 litres per person per day be incorporated within your Neighbourhood Plan policies. This standard is appropriate to the ‘serious water stress’ status of the South East. We would also welcome tighter targets than this for the following reasons –</p> <ul style="list-style-type: none"> ☑ Growing populations combined with climate change impacts over time mean we need to look towards significantly reducing water 	<p>These comments appear to relate mainly to Building Regulations matters. However, a guidance note on water infrastructure has been added after the interpretation of H006, including the recommendation of the tighter Building Regulations optional standard for water efficiency of 110 litres per person per day.</p>

			<p>consumption into the future. Adopting targets would help to achieve this, and ensure the adaptability of homes to meet the longer-term environmental impacts of climate change.</p> <p>☑ The South East region incorporates many environmentally sensitive areas. Significant challenges and environmental improvements need to be addressed, while at the same time enabling some of the highest rates of growth in the country.</p> <p>☑ Southern Water is already working to reduce per capita consumption by customers across its region to 100 litres per person per day.</p> <p>.</p>	
		SuDs	<p>Regarding SuDS;</p> <p>The risk assessments completed for the Medway catchment wastewater systems as part of our Drainage and Wastewater Management Planning* show that climate change is expected to have an impact on the risk of flooding in several wastewater systems in the Medway catchment in locations where there is already a significant risk from rainfall related flooding. The risk of flooding is likely to increase with climate change and ‘urban creep’ (the gradual expansion of impermeable areas from development) in all wastewater systems by 2050 unless measures are taken to manage and reduce these risks.</p> <p>* https://www.southernwater.co.uk/dwmp/medway-catchment/problem-characterisation-medway</p> <p>Through our work with stakeholders on the Drainage and Wastewater Management Plan process, we have considered the following options to address surface water flooding:</p> <p>1. Continuously upsizing the sewer network to accommodate existing and new development</p> <p>as well as surface water for future climates, whilst working to address the impact of CSOs by removing these from the network - all of which will require bigger treatment works to treat the greater volumes of at times highly diluted wastewater. This option would be expensive,</p>	

		<p>inefficient, disruptive and unlikely to future-proof our society from evolving climate change challenges.</p> <p>2. Reduce the amount of rainfall getting into the sewer system, to create more capacity for foul sewage. This is the adaptation required in urban developments and environments in order to manage surface water differently, and to respond to the impacts of climate change in a sustainable way. We will need to move away from impermeable surfaces, tiled roofs and rapid rainfall runoff, towards permeable paving, green roofs and measures to “slow the flow” at source. Making space for water in the urban environment will be critical too – green spaces, urban forests etc – will reduce the need for drainage infrastructure whilst at the same time creating places for people to access to improve their health and wellbeing.</p> <p>The NPPF (2021) paragraph 161 requires that plans (after applying the sequential test to locating development sites) manage any residual flood risk by:</p> <p>(c) using opportunities provided by new developments and improvements in green and other infrastructure to reduce the causes and impacts of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management).</p> <p>Well-designed sustainable drainage systems help to reduce the volume of surface water entering the foul sewer system – which could help to reduce localised flooding and, in turn, help to minimise pollution events. Sustainable drainage systems will therefore be key to helping neighbourhoods respond to the impacts of climate change into the future.</p> <p>Since 2019, water and sewerage companies have been able to adopt certain types of SuDS. On the basis of this, and the evidence provided above, Southern Water is strongly encouraging SuDS for all development, to help reduce pressure on the existing sewer network. More detail along with Southern Water’s criteria for SuDS adoption can be found here -</p>	<p>A guidance note on water infrastructure has been added after the interpretation of HOO6, including Southern Water’s advice on development.</p>
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		<p>https://www.southernwater.co.uk/media/4532/suds-outline-guidance.pdf.</p> <p>Although water companies are not statutory consultees on planning applications, we would recommend Local Planning Authorities consult with us on all major development applications within our wastewater service area.</p> <p>Proposed amendments</p> <p>To ensure consistency with the NPPF and ensure sustainable development that considers the impacts of climate change into the future, we recommend considering the following changes to the Design policy HOO6 (additional text underlined):</p> <p>4) Development should incorporate positive design features to reduce carbon use, support biodiversity and address climate change. Proposals for development must incorporate measures to support a water use target of 110 litres per person per day, and to manage and minimise flood risk and surface water run-off.</p> <p>SuDS should be incorporated in and form an integral part of new open space and the network of green infrastructure wherever possible. These should be designed in line with guidance from Medway Council and Design Guide for the Neighbourhood Plan.</p>	<p>A guidance note on water infrastructure has been added after the interpretation of HOO6, including encouragement for early engagement with Southern Water.</p> <p>The proposed requirement for water efficiency deals with Building Regulation matters. Rather than amending the policy, this has been included in a guidance note on water infrastructure, been added after the interpretation of HOO6. Additional clause added to HOO6, dealing with SuDs.</p>
	Utilities Infrastructure	<p>We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2021) paragraph 28 establishes that communities should set out detailed policies for specific areas including 'the provision of infrastructure and community facilities at a local level'. Also the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'.</p> <p>Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.</p> <p>Proposed amendments</p>	

			<p>To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows: New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.</p>	<p>A guidance note on water infrastructure has been added after the interpretation of HOO6, including text on improved utility infrastructure.</p>
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Name	Page No.	Policy/ Site Ref.	Representation	Response
Environment Agency				
	General		The Environment Agency representation includes generic guidance on neighbourhood plans.	Guidance noted. Additional requirements for SuDs have been added to Policy HOO6, in response to this and other representations.
	Ground water and contaminated land	HOO2	Groundwater and Contaminated Land Page 19 under heading Evidence and Planning Rationale makes reference to Prospective Burial Ground, Vicarage Lane. We require permits for new cemeteries that present a high risk to the environment or require active mitigation measures or burial controls to protect groundwater. Groundwater may be shallow at this location and the underlying geology may pose challenges to maintaining dry graves. An appropriate depth of unsaturated ground below the base of the grave is required in order to protect groundwater from contamination. Detailed information including the size, number of graves and a site-specific investigation of underlying ground conditions should be submitted to us at an early stage should this proposal be taken forward.	The rationale mentions the prospective burial ground, but does not include a specific policy. Policy HOO2 deals with community facilities in general, so could apply to any application for a burial ground. The Environment Agency's requirements for burial grounds are noted. Text has been added to the interpretation of HOO2, recommended early contact with the Environment Agency.
	Brownfield land	HOO3	Page 22 states Employment Development will be supported on brownfield sites. We welcome bringing brownfield land back into use. The National Planning Policy Framework guidance recommends that any brownfield site submits a Preliminary Risk Assessment to support a planning application, to ensure that the requirements of paragraph 170 can be met and the Local Planning Authority (LPA) make an informed judgement on the safe development of any site, with regard to past use, proposed use and site setting.	Comments noted.
	Flood Risk		We note that the Neighbourhood Plan does not make reference to flood risk, or the need for development and land use planning to adhere to national flood risk planning policy.	Flood risk is already adequately covered in national and local policy. It is unnecessary for the

			<p>We should be consulted as early as possible where plans may be impacted by flood zones 2 and 3, as published online.</p> <p>The Neighbourhood Plan should also be aware of the Medway Estuary and Swale Flood and Coastal Risk Management Strategy. This sets out how we plan to manage risk over the coming 100 years. Proposed management options within the Strategy may impact on future land use opportunities.</p>	<p>Neighbourhood Plan to repeat these policies.</p>
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Name	Page No.	Policy/ Site Ref.	Representation	Response
High Halstow Parish Council				
	Vision and aims.		<p>Hoo St Werburgh and Chattenden represents the greater part of Medway’s rural community made up of 11 very separate and distinct villages:- Hoo St Werburgh, Chattenden ,High Halstow, Lower Middle and Upper Stoke, St Mary Hoo, Allhallows, Cooling, Cliffe and the Isle of Grain. We agree that maintaining the separation and distinction of the Peninsula villages is paramount to foster its rural feel and communities. We welcome this being set out as part of the vision of the neighbourhood plan. The plan’s other aims strengthens and supports this vision.</p>	<p>Comment noted. Separation of settlements is also addressed in growth policies, which focus on existing settlements and developed sites, and in Policy HOO8.</p>
	Para. 2.1		<p>Under 2.1 The Area - Key Characteristics the plan points out that “The Parish sits on the Hoo Peninsula in the Greater Thames Estuary, which is one of the most important areas for birdlife in Europe. Located between the River Thames and River Medway, the Neighbourhood Plan area has rich heritage and historic assets....”</p> <p>In Medway Council’s last attempt to produce a Local Plan, Hoo St Werburgh & Chattenden along with High Halstow were singled out for large scale development in the Hoo Development Framework a developer consortium document favoured by Medway Council. This formed part of the evidenced base for the Regulation 19 Local Plan emerging in 2021 until it was withdrawn in October of that year. It was predicated on £170m secured from Homes England via the Government’s Housing Infrastructure Fund which has recently been withdrawn by the Department for levelling up Housing and Communities.</p> <p>The Preparation of a new Local Plan is underway and is currently working towards its regulation 18 consultation “Call for Sites”. In the light of the importance of the Hoo Peninsula importance to birdlife and the potential damage that may be caused to it, we suggest that</p>	<p>Comments noted. Hoo St Werburgh Parish Council shares these concerns and has made past representations and intends to make further representations on the emerging Local Plan.</p> <p>Protection of the natural environment and landscapes is addressed in HOO8. Reference to the SSSI added into the policy rationale for completeness (it is already mentioned in Policy HOO8 itself).</p>

			<p>the Neighbourhood Plan references and expands upon the recent RSPB comment made following the withdrawal of a MOD planning application for 5000 houses at Lodge Hill “Although Homes England have announced that they no longer intend to promote land within the SSSI for housing, there is still pressure to build thousands of new houses on large High Halstow Parish Council areas of land around the SSSI which could lead to damaging levels of urban pressure that could have a serious impact on the nightingales and other wildlife interests.”</p>	
	Local Green Space	HOO9	<p>Deangate Ridge, adjacent to Lodge Hill, lies on the boarder between Hoo St Werburgh & Chattenden and High Halstow. This former village golf course and Sports facility was closed by Medway Council in 2018. It followed the sale of the BP sports and social club in Bells Lane and the privately owned Sturdee Sports and Social club along Stoke Road as development sites for housing. These three facilities provided the bulk of provision for Peninsula’s health and well being and places for social interaction. The closure of Deangate Ridge remains a very emotive subject of dissatisfaction with the local Authority’s commitment to Peninsula residents, who formed an unincorporated body and successfully applied to have the whole site registered as an Asset of Community Value. We strongly recommend the designation of Deangate Ridge as a Local Green Space to provide a similar provision for the heath and well being of the residents of Hoo St Werburgh & Chattenden and the wider Peninsula.</p>	<p>Hoo St Werburgh Parish Council shares these concerns over key local facilities. Local Green Space designation can be over-restrictive for sports facilities, preventing them from improving and adapting. This could be problematic if the golf course was brought back into use. Policy HOO2 seeks to protect existing community facilities, so would apply to the golf course and the other facilities mentioned. Deansgate Ridge has been added to the list of facilities on pages 19/20. The designation as an asset of community value would also be a material consideration.</p>

Name	Page No.	Policy/ Site Ref.	Representation	Response
Hoo Consortium - Taylor Wimpey, Dean Lewis Estates, The Church Commissioners for England and Gladman (Stanec)				
	General		<p>The Consortium has significant land interests within the Neighbourhood Plan Area, alongside other land outside of it.</p> <p>The Consortium is working closely with Medway Council to achieve the Council’s vision for the Hoo Peninsula over the next 30 years, seeking to secure the major growth opportunities around Hoo, High Halstow and Chattenden. The Consortium controls land, including land outside of the Neighbourhood Plan Area, extending to over 1,500 acres and able to accommodate 8,000-10,000 new homes and new employment opportunities, alongside the accompanying schools, retail, community health, sports and leisure facilities, strategic highway and sustainable transport infrastructure. This would be complemented by major areas of strategic green space including community parkland, strategic environmental mitigation and biodiversity net gain.</p>	<p>Designation of strategic sites would be a matter for the emerging Local Plan. Hoo St Werburgh Parish Council has made past representations and intends to make further representations on the emerging Local Plan.</p>
			<p>In the main, the Neighbourhood Plan has been positively prepared, however there are policy changes required in order to achieve compliance with the basic conditions. Whilst it is recognised (at section 2.3) that the Neighbourhood Plan has been drafted “during a period of great uncertainty” in respect of Medway Council’s Local Plan preparation, there will be a need for general conformity with the emerging Local Plan. The Neighbourhood Plan should not undermine the strategic policies of the emerging Local Plan, which will identify how housing, employment and other needs are to be addressed across the whole of Medway, including within the Neighbourhood Plan Area.</p>	<p>This is an error. General conformity relates to adopted strategic local policies, not emerging policies. Planning Practice Guidance recognises that the evidence base behind an emerging local plan may form part of the evidence base for the Neighbourhood Plan.</p>

	Vision and Aims		<p>We support the vision and aims as set out in the Neighbourhood Plan, notably the recognition that sustainable growth which meets local needs will be supported, including enhancing facilities available to the local community.</p> <p>The Consortium is keen to work alongside the Parish Council, and in accordance with the visions and aims of the Neighbourhood Plan, to deliver its aspirations for its landholdings including addressing housing needs, delivering new employment and community facilities and promoting sustainable travel, whilst respecting the natural and historic environment of Hoo St Werburgh and the Chattenden Parish.</p>	<p>Comment noted.</p> <p>Comment noted. Hoo St Werburgh Parish Council is keen to work towards sustainable growth that is proportionate to the scale and character of the existing settlements and particularly notes the commitment to respecting the natural and historic environment.</p>
	Employment and Community Facilities	HOO1 HOO2 HOO3	<p>The Neighbourhood Plan recognises that employment opportunities within the Neighbourhood Plan Area are currently limited with most travelling outside the Parish for work and a large proportion of residents travelling further afield to London. We support the proposals to maintain local employment opportunities and community facilities, and to expand these where opportunities exist. This approach aligns with the Consortium’s own proposals which seek to provide new employment opportunities and community facilities for existing and future residents to make the most of.</p> <p>In this respect, the intentions of Policies HOO1 – HOO3 to support employment, community facility and industrial / distribution development are broadly welcomed.</p> <p>However, to avoid the employment policies of the Neighbourhood Plan being rendered immediately out-of-date on adoption of a new Local Plan, we recommend that the wording across these policies is flexibly drafted to accommodate the emerging Local Plan by acknowledging that new employment allocations included within the</p>	<p>Comments noted.</p> <p>The Neighbourhood Plan can’t pre-empt possible future site allocations. Hoo St Werburgh Parish Council will make appropriate representations on any employment site allocations in the emerging Local Plan.</p>

		<p>emerging Local Plan will be supported where they accord with employment allocation and other relevant policies of the 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 area. Policy HOO2 broadly reflects this, supporting community facilities in the village centre and “in other locations”, including on “open land”.</p> <p>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 Policy HOO1 would not meet the requirements of the Basic Conditions in that it would not contribute to the achievement of sustainable development.</p> <p>We suggest Policy HOO1 should be amended as below (deleted text in red and struck through, proposed new text in blue):</p> <p>HOO1: Village Centres and Employment</p> <p>1. Employment development (Use Class E) will be supported in where:</p> <p>a. The site has access to a highway with sufficient capacity;</p> <p>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</p> <p>c. The type and scale of the new employment facilities complements any existing provision of similar facilities nearby.</p> <p>the following locations:</p> <p>a. Within the village centres;</p>	<p>Policies HOO1, HOO2 and HOO3 have all been amended to provide greater consistency of wording. The neighbourhood plan policies meet the Basic Condition relating to achieving sustainable development (see accompanying Basic Conditions Statement).</p> <p>The deletion of the locations where the Neighbourhood Plan would support employment development and the other suggested amendments to the wording would create less clarity and more ambiguity and could potentially be interpreted as supporting harmful development in unsustainable locations. The suggested wording would fail to meet the Basic Conditions relating to achieving</p>
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			<p>b. Brownfield sites; c. Redevelopment or improvement of existing employment sites.</p> <p>2. Support for employment development is subject to there being no significant adverse impact on:</p> <p>a. the amenities of residential properties;</p> <p>b. the historic environment, meeting the requirements of HOO7; c. the landscape and natural environment, meeting the requirements of Policy HOO8.</p> <p>3. Within the village centres, Use Class E and F1 activities will be supported, including recreational, cultural and other community facilities.</p> <p>4. Within the village centres, shop fronts must be retained on ground floor frontage units.</p>	<p>sustainable development and also having regard to national policy and guidance.</p>
	Housing	HOO4	<p>Policy HOO4(1) provides general support for development additional to those strategic sites to be allocated by the Local Plan on infill plots, brownfield sites, etc.. This alone will not deliver the housing or affordable housing needs of the area, and it will therefore be vital wider strategic opportunities are supported to address this.</p> <p>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. This again supports the identification and delivery of strategic opportunities for housing and other needs through a comprehensive</p>	<p>The Neighbourhood Plan does not make site allocations. The policy intends to enable sustainable housing development in sustainable locations. It is accepted that additional sites may be necessary to meet local need proportionate to the scale and character of the existing settlements.</p> <p>Comment noted. However, such growth should be proportionate to the scale and character of the existing settlements.</p>

		<p>and cohesive strategy for growth across the Neighbourhood Plan Area (and wider) as is being promoted by the Consortium. Such a strategy can create a framework against which the members of the Consortium can successfully bring forward (either together or individually within that framework) much needed development within their landholdings.</p> <p>The Neighbourhood Plan does not seek to make housing allocations, instead reflecting the emerging Medway Local Plan which will address ‘strategic’ matters including housing. Nevertheless, the Consortium are keen to work with the Parish Council and alongside the Neighbourhood Plan to maximise the significant opportunities on offer for existing and future residents available within their landholdings.</p> <p>We consider the Neighbourhood Plan should include a stronger recognition of the role the Neighbourhood Plan Area (and wider Hoo Peninsula) will play in meeting local and wider housing needs across the Plan period. In this respect, the neighbouring Cliffe and Cliffe Woods Neighbourhood Plan (adopted 2022) state the following: 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 20252. In addition, applications are likely to be received and may be approved before the Local Plan is adopted.</p> <p>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</p>	<p>Hoo St Werburgh Parish Council would welcome the opportunity to work constructively towards growth proportionate to the scale and character of the existing settlements.</p> <p>Hoo St Werburgh Parish Council recognises the need for growth proportionate to the scale and character of the existing settlements. However, the disproportionate level of growth previously proposed would clearly not be supported.</p>
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		<p>The Cliffe and Cliffe Woods Neighbourhood Plan thereafter sets an objective for housing in Cliffe and Cliffe Woods to meet “Local and Wider needs” and sets a Policy framework (Policy H1) which requires major housing developments on greenfield sites to contribute to “sustainable development by including uses other than housing that are appropriate to the size and location of sites and where they do not conflict with other policies in this plan”.</p> <p>The Neighbourhood Plan should replicate this approach, recognising the established housing and other needs of the Borough thus creating a framework which strategic growth opportunities, such as those brought forward by the Consortium, can work alongside to deliver sustainable growth.</p>	<p>The vague wording used in another neighbourhood plan would be ill-advised and could be interpreted as supporting harmful development in unsustainable locations.</p>
	Place and Heritage	<p>Whilst we support the requirement for new development to be well designed to create sustainable and locally distinctive places, Policy H006 (Design) is overly prescriptive and does not reflect that major developments, especially those of the strategic-scale, could have their own distinctiveness to aid placemaking and good design. This could include variations from the prevailing character, scale and massing where considered appropriate.</p> <p>We consider Policy H006 (Design) would currently not meet the requirements of the Basic Conditions in that it would not assist in setting a positive framework for the achievement of sustainable development, and as such, recommend bullets 1 and 2 are amended as set out below:</p> <ol style="list-style-type: none"> 1. Development must be well designed to create sustainable and locally distinctive places, to complement Hoo’s historic and rural character. 2. To achieve this, new-build development must: <ol style="list-style-type: none"> a. Complement the predominantly 2-3-storey character of the area 	<p>The policy is not prescriptive on stylist matters, but does recognise predominant townscape characteristics and other aspects of character. It takes account of the NPPF and National Design Guide. Similar policies have been successful at the examination stage in other areas.</p> <p>The suggested rewording fails to take account of the National Design Guide or the AECOM design code evidence document. It removes locally specific and meaningful elements of the policy and replaces them with a</p>

			<p>b. Complement the surrounding townscape in terms of scale, massing and degree of set-back of building frontages from the road;</p> <p>a. Respond positively to, and where possible, enhance the local character of the area, including having regard to scale and massing;</p> <p>c. Provide active frontages (containing windows) facing public roads and spaces, to provide natural surveillance;</p> <p>d. Provide boundary treatments to road frontages to complement traditional boundary treatments, including low flint or brick walls and hedges.</p> <p>The relationship between the Neighbourhood Plan and the Hoo St Werburgh Design Codes document (AECOM, November 2021) is currently unclear. The latter is referenced in the supporting text for Policy HOO6, which notes it has “informed the design policy and its interrelation” and the document, alongside the National Model Design Code, “may be useful in securing compliance with the policy”. If any material weight is to be given to the Hoo St Werburgh Design Codes document this should be subject to its own consultation, informed by responses and remaining a ‘live’ document which in turn reflects the Neighbourhood Plan and emerging Medway Local Plan.</p>	<p>bland and vague requirement. It is unclear why the consortium wants to remove text relating to complementing the historic and rural character or surrounding townscape. The whole point is to avoid generic ‘anywhere’ development and to promote good urban design.</p> <p>The Plan identifies the AECOM design code as a key evidence document, which has informed several of the policies. It is poor practice for policies to rely on external documents for their implementation, so key principles from the design code evidence document have been drafted into the policies themselves. Some policy interpretations state that the design code document may be helpful in securing compliance with the policy.</p>
	Landscape and Environment	HOO8:	<p>Policy HOO8 (Landscape and Environment) is cross referenced in other policies of the Neighbourhood Plan, requiring compliance with the policy to allow support for types of growth (e.g. employment, community facilities, housing, etc.), it is therefore an important policy. Whilst the intention of the policy is supported, the policy as drafted is too prescriptive and / or restrictive in places. It conflicts with the NPPF in several areas, most notably NPPF paragraphs 180 - 181 which</p>	<p>The policy has regard to and complements national policy, as confirmed by Paragraphs 180-181 of the NPPF.</p>

		<p>protect areas designated as SSSI, SPA and Ramsar sites and irreplaceable habitats (such as Ancient Woodland). Further, a conflict with the NPPF and national guidance relating to Best and Most Versatile (BMV) Agricultural Land, which must be considered against the strategic context against which this policy will sit (i.e. the balance of loss in the context of prevalence of BMW across Medway against the significant public benefits). We therefore consider Policy H008 (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. It should not seek to repeat (or as currently drafted go beyond) national policy and guidance but instead focus on local considerations and concerns. Our proposed amendment is as below:</p> <ol style="list-style-type: none"> 1. Development should take opportunities to enhance, and avoid causing unacceptable harm to the area's landscape character, flora and fauna, and habitats, to achieve overall biodiversity net gain. 2. Development should take opportunities to enhance and must not harm: <ol style="list-style-type: none"> a. Designated sites, including Ramsar, SSSI and Special Protection Area; b. local woodlands, including ancient woodland; c. lakes, chalk streams and other water features. 3. Development adjacent to the Ramsar, Special Protection Area, SSSI and other designated and protected landscapes should include landscape buffer zones to provide visual separation and avoid disturbance of habitats or adverse impacts on biodiversity. 4. Trees and other natural features of value should be retained and be incorporated into the design and layout of development, where practicable. 	<p>The policy responds to Paragraph 174 with regard to agricultural land.</p> <p>The proposed deletions remove most of the locally specific elements of the policy and mean that it reflects national policy less well. Some minor changes have been made, including insertion of 'significant' in clause 1, replacement of 'must' with should in some clauses, and addition of 'where supported by evidence' against 'landscape buffer zones'.</p>
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			<p>5. 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.</p> <p>6. Development should cause no harm to the open character of the landscape separation between Hoo and Chattenden.</p> <p>7. Landscape design and planting in development should use local native species or other species of high environmental value.</p> <p>8. Development should take opportunities to enhance wildlife and nature conservation.</p> <p>9. 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.</p> <p>10. Development should not lead to the loss of the best and most versatile agricultural land.</p>	
	Air Quality	HOO10	<p>We support the principle of Policy HOO10 (Air Quality) which seeks to avoid the exacerbation of existing air quality issues locally, subject to the minor tweak as set out below which seeks to align the policy with national policy (inc. NPPF paragraph 186) and guidance.</p> <p>The Consortium’s proposed delivery of strategic opportunities for housing, including co-ordinated employment provision and community facilities can have a beneficial effect on Air Quality through creating opportunities for 15 minute neighbourhoods (as being advocated by the Neighbourhood Plan) and supporting a modal shift away from private car usage. This internalisation of trips and provision of new employment provision and community facilities for existing residents (thus reducing the need for them to travel elsewhere) aligns with the policy aspirations of the Neighbourhood Plan in this respect.</p> <p>HOO10: Air Quality</p> <p>1. Development should not significantly exacerbate pollution in areas with recognised air quality problems.</p>	Policy amended to include the suggested additional text, but not to delete the reference to additional vehicle movements.

			2. Development that is likely to result in significant negative impacts on air quality generate additional vehicle movements should include tree planting or other measures to mitigate impacts on air quality.	
	Travel Infrastructure	HOO11	<p>We strongly support the Neighbourhood Plan aspirations promoting sustainable modes of transport and the recognition that whilst there is provision for walking and cycling throughout the Parish this does not currently provide an attractive alternative to private car usage. To address this, and “provide a balanced range of transport choices and more sustainable live-work patterns”, 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 Parish.</p> <p>These are key principles supported by the Consortium’s proposals within the Neighbourhood Plan Area which will prioritise walking and cycling and support a modal shift away from private car usage as previously discussed in this response.</p> <p>We consider the below amendment is necessary to Policy HOO11 (Sustainable Transport and Active Travel) bullet 3 to ensure it is consistent with the NPPF and planning legislation: HOO11: Sustainable Transport and Active Travel</p> <p>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 there are significant impacts on the transport network or highway safety, with additional pedestrian crossings where necessary.</p>	<p>The commitment to sustainable transport and active travel (walking and cycling) is welcomed. However, this is contradicted by the suggested deletion of the reference to necessary pedestrian crossings. The policy title includes active travel, so deletion of provisions relating to active travel is not supported, having regard to the NPPF and National Design Guide.</p> <p>It is immaterial whether highway works are undertaken by the developer or by the Highways Authority, based on financial contribution. It is unnecessary for the policy to address the method of delivery.</p>
	Infrastructure		<p>No specific policies are proposed under the ‘infrastructure’ section. However, we support the recognition of the need for additional community facilities within the Neighbourhood Plan area, especially for younger persons.</p> <p>This can be addressed through improvements to existing facilities, e.g. through planning contributions as recognised by the Neighbourhood Plan, or embedded within development proposals, e.g. as part of the range</p>	Comment noted.

		<p>of community facilities to be delivered within the Consortium proposals.</p> <p>Notwithstanding the recent discussions regarding the Housing Infrastructure Fund (HIF), the Consortium remains committed to supporting the local community through provision of the social and physical infrastructure required to accompany the Consortium proposals.</p>	
	General	<p>As set out in these representations, we support the aims and aspirations of the Neighbourhood Plan but consider there are policy changes required to achieve compliance with the Basic Conditions. We welcome that the Parish Council and steering group have taken a flexible and positive approach to the development of the Medway Local Plan's emerging policies and their supporting evidence as the Neighbourhood Plan has developed. We urge that this approach continues as the emerging Medway Local Plan progresses, to ensure the Neighbourhood Plan remains 'current' and in general conformity with it.</p> <p>We will continue to engage with the Neighbourhood Plan as it moves through the necessary consultation and Examination stages, and hope to work closely with the Parish Council to ensure the Consortium's proposals accord with and complement the Neighbourhood Plan going forward.</p>	<p>Comments noted. See also above comments on specific policies. Some amendments have been made in response to some of the above and other representations. Hoo St Werburgh Parish Council is satisfied that the Plan meets the Basic Conditions (see accompanying Basic Conditions Statement).</p>

Name	Page No.	Policy/ Site Ref.	Representation	Response
Uniper (Stanec)				
	General		<p>In November 2022, Uniper secured resolution to grant Outline planning permission for a range of employment uses at the Former Kingsnorth Power Station site (known as MedwayOne), Outline application ref. MC/21/0979.</p> <p>The MedwayOne development will provide a vital contribution towards strategic growth within the Neighbourhood Plan area providing for over 2,000 jobs and delivering £48 million economic output per annum once the site is fully occupied. The energy hub will generate electricity and heat using fuel derived from waste which will be used on site and off site. The development will also provide for a network of blue and green infrastructure across the site, provision of 10% biodiversity net gain, and inclusion of renewable energy across the wider site. A package of financial contributions towards sustainable travel and highways improvements has also been secured as part of the draft permission to mitigate the impact of the development.</p> <p>We consider that the H&CNP has been positively prepared and sets out a clear vision for the future of Hoo St Werburgh and Chattenden. However, we consider that there are some policies contained within the H&CNP which should be amended in order to ensure that it meets the necessary basic conditions tests identified in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).</p>	Comments noted.
	Vision and Aims		We support the vision and aims set out within the H&CNP which seek to promote sustainable growth and development within the Neighbourhood Plan Area. The development of the MedwayOne site over	Comment noted.

			the Neighbourhood Plan period and beyond will play an important role in meeting these overarching objectives.	
	Employment and Community Facilities	HOO1 HOO2 HOO3	<p>The H&CNP policy HOO1: Village Centres and Employment supports employment development within villages centres; brownfield sites and redevelopment or improvement of existing employment sites. We support the development of brownfield sites and redevelopment of existing employment sites, however, recognise that the H&CNP policy HOO1 will need to be flexibly worded to include future employment allocations as set out within the emerging Medway Local Plan.</p> <p>In this way employment development should be aligned with the emerging Local Plan and the approach to development set out within strategic planning policies to ensure that the H&CNP is in conformity with the Local Plan. The emerging Medway Local Plan will also have to accord with National policy as set out within the NPPF, in particular making effective use of land. Para. 119 confirms that “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”.</p> <p>The comprehensive redevelopment of the former Kingsnorth Power Station site is a prime example of the regeneration of a brownfield site which is fully aligned with the approach set out within the NPPF to prioritise development on brownfield land.</p>	<p>The Neighbourhood Plan can’t pre-empt possible future site allocations. Hoo St Werburgh Parish Council will make appropriate representations on any employment site allocations in the emerging Local Plan.</p> <p>For clarity, the Basic Condition relating to general conformity relates to adopted strategic local policies, not emerging policies. Planning practice guidance recognises that the evidence base behind an emerging local plan may form part of the evidence base for the Neighbourhood Plan.</p> <p>This is already approved. However, the Neighbourhood Plan would in future support employment development on brownfield sites.</p>

			<p>H&CNP policy HOO3: Industry and Distribution supports industrial and storage and distribution development within existing employment areas as identified within the current Medway Local Plan.</p> <p>Whilst we support the identification of these key employment areas for development, including the Kingsnorth Employment Area, the H&CNP should also ensure that this aligned with any future employment allocations within the emerging Local Plan.</p> <p>Whilst we generally support the development criteria set out within policy HOO3 part 2 which seeks to ensure that development does not cause adverse traffic related or environmental impacts, we consider that part 2a) of policy HOO3 is too restrictive and does not align with National policy.</p> <p>Part 2a) notes that “support of industrial and distribution development is subject to: the site having adequate access to a highway with sufficient capacity.” In terms of the requirement for the site to have access to a highway with sufficient capacity, this is not aligned with NPPF para. 111 which states that “development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”</p> <p>Therefore, we consider policy HOO3 part 2a) should read as follows:- Support for industrial and distribution development is subject to: a) The site having adequate <u>safe</u> access <u>and no severe impact upon</u> to a <u>the highway network</u></p>	<p>The Neighbourhood Plan can't pre-empt possible future site allocations. National policy and guidance sets out the relationship between Local and Neighbourhood Plans.</p> <p>The policy requirement for adequate access would be applied against the context of national policy. Adequate could cover many factors, including those referred to in national policy. There is no apparent contraction in the wording. However, the policy has been amended through the suggested addition of the word 'safe'.</p> <p>In addition, Policies HOO1, HOO2 and HOO3 have all been amended to use similar wording, in the interests of consistency.</p>
	Place and Heritage	HOO6	<p>We support the aims of policy HOO6 which seeks to encourage design quality, however we note that the policy wording is currently too onerous in terms of the design requirements identified. Part 1 notes that “development must be well designed to create a sustainable and</p>	<p>The policy does not set densities. Rather it draws on the National Design Guide and ensures that development is designed for the specific site and context. There is no</p>

			<p>locally distinctive places, to complement Hoo's historic and rural character." Whilst the NPPF para. 130 notes that "Planning policies and decisions should ensure that developments: c) are sympathetic to local character and history, including the surrounding built environment and landscape <u>setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)</u>" (our emphasis underlined).</p> <p>In this way, policy HOO6 should be re-worded to ensure that it is aligned with National planning policy and meets the requirements of the basic conditions to ensure that it contributes towards the achievement of sustainable development.</p>	<p>contradiction with national policy. The policy explicitly supports "innovative or creative design solutions that are designed for the specific site and context, especially where they offer superior environmental performance". The policy meets the Basic Conditions.</p>
	Landscape and Natural Environment	HOO8 HOO10	<p>Whilst we support the aims of policy HOO8: Landscape and Environment the policy wording does not align with National policy set out within the NPPF. Policy HOO8 part 1 notes that "Development should take opportunities to enhance, and avoid causing harm to the area's landscape character, flora and fauna, and habitats, to achieve overall biodiversity net gain." However, the NPPF (para. 180-181) seeks to offer the greatest protection to designations including SSSI, SPA, SAC, Ramsar sites and ancient woodland, rather than a broader policy prescription of general harm to landscape character.</p> <p>In this way, policy HOO8 does not presently meet the requirements of the basic conditions in that it does not have regard to National policies and guidance and does not contribute to the achievement of sustainable development.</p> <p>We support the aims of policy HOO10: Air Quality, however, consider that part 2 of the policy should be re-worded as it is presently too onerous and not aligned with the NPPF. The policy should make it clear that development that is likely to generate significant adverse impacts upon air quality should provide for mitigation measures.</p>	<p>The policy has regard to and complements national policy. It identifies locally specific landscape features and is flexibly worded. It would be applied against the context of Paragraphs 180-181 of the NPPF. Similar policies in other plans have been successful at examination stage.</p> <p>Policy amended to refer to significant negative impacts on air quality.</p>

	Travel Infrastructure	HOO11	<p>We welcome the H&CNP’s long term aspirations to promote sustainable transport and active travel.</p> <p>The MedwayOne site will be contributing towards sustainable transport objectives through the provision of a Framework Travel Plan for the wider site, allowing for individual occupiers to come forward with detailed Travel Plans. The development will also provide financial contributions towards bus service provision for employees.</p> <p>It is encouraging that the H&CNP seeks to provide policy support for the promotion of sustainable modes of travel through policy HOO11: Sustainable Transport and Active Travel. However, we consider that there are some amendments required to the policy wording to ensure that it is consistent with the NPPF and planning legislation.</p> <p>Part 3 presently reads as follows: “Development must be supported by adequate road infrastructure to safely support additional traffic movements with additional pedestrian crossings where necessary.”</p> <p>We consider that this policy wording should be amended as follows: Development must be supported by adequate road infrastructure <u>and/or financial contributions where necessary to mitigate the impact of development and safely support additional traffic movements, where there are significant impacts on the transport network or highway safety.</u> with additional pedestrian crossings where necessary.</p> <p>This policy should be amended to align with NPPF para. 110 (d) “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: (d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”.</p> <p>To align with the NPPF, proposed wording has been inserted into the draft policy wording to enable</p>	<p>Comments noted.</p> <p>The policy title includes active travel, so deletion of provisions relating to active travel is not supported, having regard to the NPPF and National Design Guide.</p> <p>It is immaterial whether highway works are undertaken by the</p>
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	General	<p>We support the aims and objectives of the H&CNP, however we consider that there are amendments which should be made to draft policies in order to ensure that the basic conditions tests as set out within paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) are met.</p> <p>We hope that the H&CNP steering group continues to engage with Medway Council and the emerging Medway Local Plan to ensure that the long term strategy for sustainable growth within the Neighbourhood Plan area is aligned. We will also continue to engage with the H&CNP as it progresses through the policy making stages to ensure that delivery of the MedwayOne site supports the aspirations of the H&CNP.</p>	<p>Comments noted. See also above comments on specific policies. Some amendments have been made in response to some of the above and other representations. Hoo St Werburgh Parish Council is satisfied that the Plan meets the Basic Conditions (see accompanying Basic Conditions Statement).</p>

4.3 Resident Representations

Name	Ref.	Representation	Response
Resident 1	General/Aims	Impressed by work done and aims.	Comment noted.
Resident 2	Vision & Aims	Vision & Aims very acceptable	Comment noted.
Resident 3	Vision & Aims	Vision & Aims very acceptable	Commend noted.
Resident 4	General	Tremendous amount of work	Comment noted.
Resident 5	H004	<p>New housing should compulsory have solar panels.</p> <p>H004 Affordable housing is only affordable once a system is employed whereby any subsidy is written into every sale.</p>	<p>The Plan supports and encourages green design and microgeneration, but cannot be prescriptive on the provision of solar panels.</p> <p>Concerns over affordable housing provision are shared. However, the Plan is subject to legal tests (Basic Conditions) which include having regard to national policy and guidance and being in general conformity with strategic local policy. For this reason, H004 seeks to shape how affordable housing is provided, but does not seek to modify thresholds or proportions set in Local Plan policy.</p>
Resident 6	Vision & Aims	Vision & Aims very acceptable	Comment noted

Resident 7	General	Plan is long, could be shorter	The length is based on the policies and supporting information required to make an effective Plan to influence decisions in the development management process.
Resident 8	HOO5	Minimum room sizes decreasing Mention Deangate.	A ministerial statement has made clear that Neighbourhood Plans cannot impose nationally described space standards, so reference to this has been deleted from the interpretation to HOO5 and replaced with text encouraging good room sizes and storage space. Mention to Deansgate has been added to the rationale for Policy HOO2.
Resident 9	Various policies	Roads not wide enough. Garages too small, lack of cycle paths. Housing must be for local people.	The Plan cannot amend highway standards, but does seek to ensure that roads are adequate for service and emergency vehicles (HOO11). HOO11 addresses facilities for active travel. The interpretation mentions the need for garages to be sufficient to accommodate larger vehicles. This could not be required or enforced, except in very specific circumstances, usually dealt with through planning conditions.

		<p>New developments devoid of trees & nectar rich plants.</p> <p>Solar panelling to be on every new build.</p>	<p>HOO8 deals with trees and requires planting to include local native species or other species of high environmental value.</p> <p>The Plan supports and encourages green design and microgeneration, but cannot be prescriptive on the provision of solar panels.</p>
Resident 10	HOO8	Need to make more of Ramsar & SSSI	HOO8 makes direct reference to the Ramsar and SSSI in clauses 3 and 4. Other clauses would also apply.
Resident 11		Positive strategy for sustainable growth	Comment noted.
Resident 12		Recommend acceptance of plan.	Comment noted.