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

19th February 2024.

By Email Only

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

Please see below Dean Lewis Estates Ltd (DLE) response to the Hoo St Werburgh and Chattenden Neighbourhood Plan under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.

DLE is a professional Strategic Land Promotion business specialising in the promotion of sustainable development of communities, providing new homes and associated community infrastructure throughout England.

DLE have significant landholdings on the Hoo Peninsula, within the Neighbourhood Plan area, including land to the south of Hoo St Werburgh and at Stoke Road. Collectively DLE land will deliver circa 2.000 dwellings together with essential community infrastructure including, health provision, sports provision, retail and tertiary provision, and vitally, major areas of Strategic Environmental Mitigation required to facilitate additional growth at Hoo St Werburgh, Chattenden and on the wider Hoo Peninsula.

DLE are part of the Hoo Rural Town Consortium. For the purpose of this consultation, DLE also rely on the representations submitted by Stantec, on behalf of the full Consortium which sets out and supports the Consortium's shared vision and response to the consultation.

The collective position is that the Neighbourhood Plan provides a positive strategy for growth now and must have regard to Medway's emerging strategic planning process.

These representations pertain to the Draft Neighbourhood Plan Hoo St Werburgh and Chattenden and are set out in the context that the Neighbourhood Plan must meet the 'basic conditions' test as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the Planning Practice Guidance (PPG).

Basic Conditions - Relationship to Local Plans

In order to achieve accordance with the requirements of the Framework and the Neighbourhood Plan basic conditions, the new neighbourhood plan must conform to the strategic policy requirements set out in the adopted Development Plan.

The new Neighbourhood Plan policies are required to achieve conformity with the strategic policies contained within the adopted Medway Local Plan 2003.

Medway Local Plan predates the current NPPF, and the strategic policies contained within are not based on up to date evidence that addresses the housing, employment and community infrastructure needs of the Neighbourhood Plan area.

Medway Council is currently developing a new Local Plan, and which will be based on new up to date evidence to inform the policy basis that will guide new development up to 2040.

The current timetable produced by Medway anticipates Submission of the Medway Local Plan June 2025 for examination with adoption proposed in 2025/6.

It is evident that the Neighbourhood Plan will necessarily have to conform to adopted Local Plan policies that are demonstrably out of date. Whilst conformity and subsequent adoption could theoretically be achieved with these outdated Local Plan policies, the new Neighbourhood Plan will be rendered out of date almost immediately upon the adoption of the new Medway Local Plan unless the policies contained within it are sufficiently flexible and permissive in meaning to support the growth envisaged in the emerging Medway Local Plan.

Indeed, an almost identical set of circumstances arise in respect of the neighbouring parish of High Halstow where that NP, despite reaching examination stage, has been abandoned.

Whilst the production of Neighbourhood Plan for Hoo St Werburgh and Chattenden is both legitimate and laudable, we would urge the Neighbourhood Plan Team to either pause the production of the emerging NP or to ensure that the policy wording supports new growth in line with the Framework.

The Neighbourhood Plan policies should be amended to adopt a flexible and positive approach that accord with the Framework.

Vision and Aims

DLE supports the vision of the Neighbourhood Plan which recognises that ‘sustainable growth that meets diverse local needs will be supported, including enhancing facilities available to the local community’. **Notably the policies contained within the emerging NP, as drafted, will not facilitate the successful delivery of the Vision and Aims.**

Employment and Community Facilities

The Neighbourhood Plan notes that limited job options within the NP area contributes to residents working outside of the Parish and commuting further afield. DLE support proposals aimed at safeguarding local job prospects and improving community amenities, with an interest in expanding them when possible. However, as presently worded the draft policy H001 arbitrarily restricts employment growth in sustainable locations.

DLE **object** to the Policy criteria as expressed in **H001: Village Centres and Employment** which aim to reinforce employment, community facilities, and industrial/distribution developments. The policy as currently worded will fail to deliver new employment growth in sustainable locations but instead will arbitrarily restrict it.

DLE suggest a revised wording, “New employment development (Use Class E) will be supported in the existing built settlements or in other sustainable and accessible locations near to or accessible from housing”

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

Housing

DLE notes that the Neighbourhood Plan does not seek to allocate sites for housing but instead defers to s the emerging Medway Local Plan which will address ‘strategic’ matters including housing allocations.

DLE also note the aspiration as expressed within the NP to achieve greater community cohesion through development and recognise the benefit that an overarching strategy for future growth across the NP area and wider Hoo Peninsula would bring.

However, as currently expressed the emerging policy wording contained with draft NP Policy H004 restricts the ability for housing that can be shown to be demonstrably sustainable from coming forward. This lacks due conformity with the Framework.

DLE object to draft **NP Policy H004** as drafted.

A revised policy wording should incorporate the following wording.

H004: Housing Growth and Mix 1. In addition to strategic sites allocated by local plan, residential development will be supported in the following locations on other greenfield and brownfield sites which are or can be made sustainable.

Landscape and Environment

HOO8: Landscape and Environment

DLE object to HOO8 Landscape and Environment policy as currently drafted.

The wording is restrictive and conflicts with the NPPF in several areas, notably NPPF paragraphs 185 - 186 which protect areas designated as SSSI, SPA and Ramsar sites and irreplaceable habitats (such as Ancient Woodland).

Policy HOO8 (Landscape and Environment) requires modification to enable consistency with the objectives as set out in the Framework to contribute to the achievement of sustainable development.

Conclusion

DLE consider that several modifications to the draft policy wording are required to achieve compliance with the basic conditions and to achieve accordance with the Framework.

Our thanks to the Parish Council and steering group for their work in assembling this consultation material and likewise DLE will continue to work proactively and positively with all key stakeholders to deliver sustainable growth at Hoo St Werburgh.

Should you have any questions or clarifications in respect of our representations, please do not hesitate to contact me.

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