

Dear Sir/Madam

Thank you for your consultation on the above document.

The Board supports the Vision for the Neighbourhood Plan, especially in addressing climate change, and sustainability.

Almost the entire area is within a river catchment that flows into the Lower Medway Internal Drainage Board's drainage district, and we are particularly interested in the means of surface water disposal from any development as there are several areas within Hoo **sensitive to flooding**.

Under HOO6:Design, the Board would suggest in item 4 that the LPA may wish to include water reuse to encourage the addition of design features that support this and help redress water stress.

4. Development should incorporate positive design features to reduce carbon use, support biodiversity, support water reuse, and address climate change.

The Board welcomes items 6 and 7 under the same heading.

6. Hard surface ground materials should take account of the local context and be water permeable.

7. Support will be given to innovative or creative design solutions that are designed for the specific site and context, especially where they offer superior environmental performance.

Under item 8, perhaps consideration could be given to adding "a variety of SuDS" should be used where practicable as this has significant benefits to control and cleansing the discharge but also benefits to biodiversity and amenity. The SUDS Design Philosophy from The SuDS Manual C753 (CIRIA 2015) should be followed, and schemes should use multiple components working together as an interconnected system designed to manage, treat and make best use of surface water. This would help avoid the common approach of an isolated end-of-pipe solution where opportunities are lost. The designer can choose several different SuDS components and tailor the overall composition of a SuDS scheme to the local context.

8. A variety of different Sustainable Drainage Systems (SuDS) should form an integral part of new spaces and green infrastructure, wherever possible.

Under HOO8: Landscape and Environment and item one, the Board suggests that the LPA may wish to consider providing a minimum percentage biodiversity net gain.

1. Development should take opportunities to enhance and avoid causing significant harm to the area's landscape character, flora and fauna, and habitats, and seek to achieve an overall minimum 10% biodiversity net gain.

Under the design codes the Board fully supports Section SU02 on water management and again, perhaps consideration could be given to encouraging the use of multiple SuDS components to maximise opportunities and benefits.

The Board hopes that the above has been of assistance and should you require any further clarification, please do not hesitate to contact us.

For information

Developers should be aware that Land Drainage Consent is required in line with the Board's byelaws (specifically byelaw 3), a copy of which is available at <https://lowermedwayidb.co.uk/wp-content/uploads/2022/01/Lower-Medway-Byelaws.pdf> for any proposed discharge of surface water into a watercourse that drains into the Board's district whether directly or indirectly. In addition, any consent granted for surface water discharge will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy available at https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf. The one-off Surface Water Development Contribution is due to the Board to cover the increased flow and volume in its maintained drainage network.

Kind regards,

[Redacted Signature]

[Redacted Signature]

Technical Officer

Lower Medway Internal Drainage Board

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