



**Cllrs. Crozer, Pearce and Sands
The Independent Group
on Medway Council
Hoo & High Halstow Ward**

C/O 17 Grandsire Gardens,
Hoo,
Hoo Peninsula,
Rochester,
Kent,
ME3 9LH

Monday 19th February 2024

Local Planning Authority (LPA)
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

CC: Catherine Smith (Head of Planning Policy) and Dave Harris (Chief Planning Officer).

Re: Hoo & Chattenden Neighbourhood Plan Regulation 16 Consultation 2024.

Dear Local Planning Authority (LPA) and Planning Inspector,

We write to you as the three Independent Councillors for Hoo and High Halstow Ward on Medway Council - representing the communities of Chattenden, High Halstow and Hoo on the Hoo Peninsula. This is our representation to Hoo & Chattenden Neighbourhood Plan Regulation 16 Consultation - running from 8th January to 19th February 2024.

We support the draft Hoo & Chattenden Neighbourhood Plan (NP) and its submission for Examination by the Planning Inspector. We believe the NP **meets the Basic Conditions and other legal requirements**, particularly the LPA's retained Strategic Policy.

Consultation with the local community.

The Neighbourhood Plan Steering Group is a team of passionate and committed volunteer residents who have contributed hundreds of hours of their time to produce this Neighbourhood Plan (NP) for the benefit of the local community. This included extensive consultation with the local community - particularly groups who are generally regarded as hard to reach or hard to engage with when it comes to planning matters.

The Steering Group has engaged as much as reasonably possible with the local community, including local primary and secondary schools, local businesses, local service providers and local landowners. Local residents have also been significantly engaged with, including the Steering Group attending a wide range of community events, publicising and holding various meetings at the local church and village hall, carrying out leaflet deliveries to every property in the parish and placing adverts in the local community magazine/newspaper (this publication is also delivered to every property in the parish).

The draft Neighbourhood Plan conforms with the adopted Medway Local Plan 2003 (a basic condition).

The Local Planning Authority (LPA) as well as Homes England and the Hoo Consortium of developers (who are promoting sites for development in the area) have questioned the conformity of the draft NP with the emerging new Local Plan (LP) for the LPA. There is no certainty for when a new LP will be adopted and the LPA's latest Local Development Scheme, agreed by the Medway Council Cabinet on 13th February 2024, very optimistically suggests a submission date for Independent Examination by June 2025. Because of the complexity and scale of growth the new LP is likely to provide for, the Examination of this document and the supporting evidence will

probably take a minimum of two years. This means the new LP plan is realistically expected to be adopted no earlier than mid-2027.

Delaying or frustrating the progress and adoption of a NP for the communities of Hoo and Chattenden, for three or four years or more, **is not acceptable and is also potentially unlawful**. A NP is only legally required (a basic condition) to conform with the adopted Local Plan - in this case the Medway Local Plan 2003.

There is also no compulsion for a NP to make site allocations and **there is no requirement for a NP to be delayed due to an emerging LP**. A potential delay or frustration of the NP process could also be portrayed as **predetermination** of the emerging LP and the preferred site allocations of the LPA. Therefore, we believe the draft NP complies with the Basic Conditions and takes account of LPA policy and the adopted Local Plan.

Recognition of Hoo specifically as a village.

It is recognised that Hoo is a large village and settlement with 11,367 residents (2021 census). The LPA has specifically questioned the NP maintaining the recognition and identity of Hoo as a village, believing this underplays the importance of securing a better range of services locally. The LPA also believes there is a tension between retaining references to Hoo as a village and not acknowledging the scale of population. **We strongly disagree with this view and explain our reasons below.**

The LPA and Planning Inspector should note that Ecclesfield in South Yorkshire is the most populous recognised village in England with a population of 32,073 (2011 census). Hoo itself is believed to not feature in the five most populous villages in England. This list includes: **Lancing, West Sussex - population 18,810. Cottingham, East Yorkshire - population 17,164. Kidlington, Oxfordshire - population 15,046. Great Baddow, Essex - population 14,650.** Therefore, it is entirely reasonable to continue to recognise Hoo as a village.

In just local context terms and within the LPA's jurisdiction, there are five recognised towns: Rochester, Strood, Chatham, Gillingham and Rainham. All five of these towns feature significant high streets which undoubtedly gives them the recognition of being a town. This isn't the case with Hoo, which has retained its village feel with a small and constrained centre.

It should be noted the least populated city in the United Kingdom is St. David's in Pembrokeshire, Wales with a population of just 1,841 (2011 census). The recognition of a settlement as a village, town or city has absolutely no bearing on whether a settlement secures a better range of services. This is especially the case with commercial decisions - for example, a supermarket chain is not going to make a decision whether to propose a new premises on the basis of a settlement recognising itself as a town or village.

How Hoo and Chattenden are recognised is a decision for local residents and the Parish Council.

The Chattenden Valley.

The greenfield agricultural land between Hoo and Chattenden, known as the Chattenden Valley, is a valued, attractive and hilly landscape separating the two settlements. The valley allows views of the hills, woodlands, river, open farmland and marshes. It is paramount this open landscape is protected from harmful development in order to retain the distinctive identities of Hoo and Chattenden. The policies contained within the NP award the Chattenden Valley a significant level of protection and this is supported. We believe this policy position is compliant with the adopted Medway Local Plan 2003 and the NPPF.

It should be noted the Chattenden Valley is specifically highlighted and valued by the NP and other parts of the NP area are not subject to the same level of policy. This is a reasonable policy position that specifically recognises a highly valued part of the NP area requiring protection from harm. It is critical that significant greenfield buffers, mostly in the form of agricultural land, are also maintained between Hoo and other neighbouring settlements such as High Halstow and Upper Stoke, for the same reasons mentioned above.

Conclusion.

We support the draft Hoo & Chattenden Neighbourhood Plan (NP) and its submission for Examination by the Planning Inspector. We believe the NP **meets the Basic Conditions and other legal requirements**, particularly the LPA's retained Strategic Policy.

The only parties appearing to be raising concerns about the policies contained within the NP are developers who are promoting local sites for inclusion in the LPA's emerging new LP. This NP is only legally required to conform with the adopted Medway Council Local Plan 2003. There is no compulsion for a NP to make site allocations and there is no requirement for a NP to be delayed due to an emerging LP. Any deviation from this could be seen as **predetermination** of the LPA's LP process - this process is subject to a sustainability appraisal and capacity assessments before preferred sites are objectively chosen for a Regulation 19 draft LP.

Thank you and yours faithfully,

George Crozer

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