

Planning Committee – Supplementary agenda No.1

A meeting of the Planning Committee will be held on:

Date: 17 December 2025

Time: 6.30pm

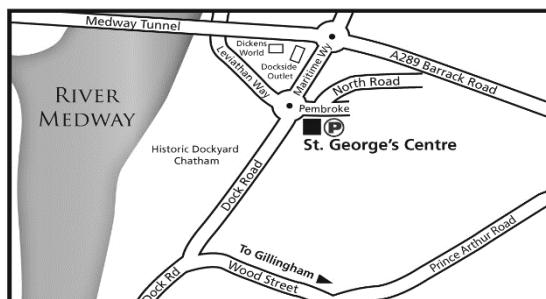
Venue: St George's Centre, Pembroke, Chatham Maritime, Chatham ME4 4UH

Items

15 Additional Information - Supplementary Agenda Advice Sheet (Pages 3 - 38)

For further information please contact Julie Francis-Beard, Democratic Services Officer on Telephone: 01634 332012 or Email: democratic.services@medway.gov.uk

Date: 17 December 2025



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<p>Medway Council</p>
<p>Planning Committee – 17 December 2025</p>
<p>Supplementary Agenda Advice Sheet</p>

All Items on Committee

The Government has published (16 December 2025) a consultation draft version of a new National Planning Policy Framework (NPPF) seeking comments by 10 March 2026.

As this document is a draft that is being consulted on and the existing National Planning Policy Framework (2024) has not been withdrawn or revoked it is considered that the consultation draft be given no weight in the consideration of the applications on the agenda and they are determined with regard to the policies and paragraphs in the current National Planning Policy Framework as set out in the reports.

Page 22 – Planning Application MC/25/0006 Land off Rochester Road, Wainscott, Rochester

Consultations and Representations

Active Travel England have commented that it is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.

An objection has been received from the **Independent Group** – which raises objections to the proposals on the following grounds (attached in full for Members information):

- Clear conflict with adopted development plan policies;
- Demonstrable harm to the countryside and designated Area of Local Landscape Importance (ALLI);
- Insufficient legal and environmental justification under the Habitats Regulations;
- Incomplete and deferred Biodiversity Net Gain evidence;
- Unsound reliance on claims relating to housing land supply;
- Unresolved transport and infrastructure impacts;
- Adverse effects on rural lanes (BNE47).

Harms are admitted, while the benefits are overstated and unproven.

Evidence base is either incomplete, highly assumption-driven, or reliant on mitigation that is not quantified, secured, or demonstrably effective.

Proposal fails the statutory planning test under Section 38(6), fails numerous Local Plan policies, and does not achieve sustainable development under the NPPF.

Housing delivery does not override the fundamental duty to safeguard designated landscapes, natural capital, and protected ecological assets.

On any reasonable assessment, the adverse impacts of this proposal significantly and demonstrably outweigh the benefits when assessed against both the development plan and the NPPF taken as a whole.

Application is contrary to the Medway Council Local Plan 2003, fails to comply with the NPPF (December 2024), is unsound in environmental terms, and fails to establish a lawful, policy-compliant basis for development within open countryside and a designated ALI.

The application should, therefore, be REFUSED.

A further 6 representations have been received from members of the public which raise the same issues as set out in the main report.

Officer Comment: None of the additional representations change the content of the report or recommendation.

**Page 142 – Planning Application MC/25/1657 15 Paget Street,
Gillingham, ME7 5ER**

Appraisal

Within a 500-metre radius of the application site there are a total of 1,867 residential households, of which 57 are in use as Houses in Multiple Occupation (HMOs). When expressed as a percentage, this equates to approximately 3% of the housing stock.

This level of HMO concentration is comparable with the wider Ward average, where approximately 2.8% of dwellings are in HMO use. Therewith, does not indicate an over-concentration or proliferation within the local area.

A plan showing the 500m radius area is attached for information.

**Page 156 – Planning Application MC/25/1488 25 Franklin Road,
Gillingham, ME7 4DF**

Appraisal

Following the collection of the data with regards to number of HMOs within the immediate area, an application under reference MC/25/2077 for a Lawful Development Certificate was approved at 48 Franklin Road for a change of use to 6 bed HMO. A subsequent application has been submitted for the change of use of the 6-bedroom HMO to a 9-bedroom 9-person HMO in

November under reference MC/25/2147, which is currently under consideration.

The LDC approval would, therefore, result in an additional HMO within Franklin Road to that stated in the officer report, taking the total in the 500m radius of the site to 37. Within a 500-metre radius of the application site there are a total of 2606 residential households, of which 37 are in use as Houses in Multiple Occupation (HMOs). When expressed as a percentage, this equates to approximately 1.5% of the housing stock.

This level of HMO concentration is lower than the wider Ward average, where approximately 2.8% of dwellings are in HMO use. Therefore, does not indicate an over-concentration within the local area.

A plan showing the 500m radius area is attached for information.

Page 170 – Planning Application MC/25/1453 3 Kingswood Road, Gillingham, ME7 1DZ

Appraisal

Within a 500-metre radius of the application site there are a total of 2,266 residential households, of which 62 are in use as Houses in Multiple Occupation (HMOs). When expressed as a percentage, this equates to approximately 2.7% of the housing stock.

This level of HMO concentration is slightly lower than the wider Ward average, where approximately 2.8% of dwellings are in HMO use. Therewith, does not indicate an over-concentration or proliferation within the local area.

A plan showing the 500m radius area is attached for information.

Page 184 – Planning Application MC/25/1595 31 Stafford Street, Gillingham, ME7 5EN

Appraisal

Within a 500-metre radius of the application site there are a total of 2,253 residential households, of which 58 are in use as Houses in Multiple Occupation (HMOs). When expressed as a percentage, this equates to approximately 2.6% of the housing stock.

This level of HMO concentration is slightly lower than the wider Ward average, where approximately 2.8% of dwellings are in HMO use. Therewith, does not indicate an over-concentration or proliferation within the local area.

A plan showing the 500m radius area is attached for information.

Page 198 – Planning Application MC/25/0937 Two Acre Farm, Ropers Green Lane. High Halstow, Rochester, ME3 8QP

Recommendation

Additional condition in relation to the materials for the two access roads which shall be as follows:

No pitches shall be occupied until a plan indicating the design and materials of the road surfacing treatment has been submitted to and approved in writing by the Local Planning Authority. The roadways shall be completed in accordance with the approved details before any pitches are occupied and shall thereafter be retained.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003 and to manage surface water during and post construction and for the lifetime of the development as outlined at Paragraph 181 of the NPPF.

Page 226 – Planning Application MC/25/0937 Land to the north of Stoke Road and east of Walnut Tree Grove, Hoo St. Werburgh, ME3 9YB

Representations

An objection has been received from the **Independent Group** – which raises objections to the proposals on the following grounds (attached in full for Members information):

- Impact on Habitats Regulations and SPA/Ramsar;
- Location in the countryside, outside the settlement boundary and not an allocation;
- Harm to landscape and settlement edge character;
- Inadequate sustainable transport credentials and highway safety concerns;
- Insufficiently robust treatment of air quality and modal shift;
- Uncertain and potentially inadequate BNG;
- Impacts on air quality;
- Impacts on rights of way;
- Contrary to neighbourhood plan.

And one further objection from a member of the public – which raises objections to the proposal on the following grounds:

- Development in a rural area;
- Impact on local services;
- Impacts on transport infrastructure;

Officer Comment: These matters have been dealt with in the main report or will be addressed at Reserved Matters stage.

THE
INDEPENDENT
GROUP

ON MEDWAY COUNCIL

Representation concerning MC/25/0006

"Outline application with some matters reserved (appearance, landscaping, layout and scale) for demolition of existing buildings, the erection up to 800 dwellings (use class C3), 2-Form Entry primary school, mixed use local centre (use class E and F2), retirement living (use class C2), associated works and public open space. Approval is sought for the principal means of vehicular access from Lower Rochester Road and Higham Road"

Land At Lower Rochester Road

Wainscott, Hoo Peninsula, Rochester, Kent, ME3 8EL

Short Planning Representation

Monday 8th December 2025

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About The Independent Group (TIG)

The Independent Group (TIG) is a group of five Independent Councillors who sit on Medway Council. We represent the following Medway Council Wards and the following rural villages on the Hoo Peninsula in Kent:

Strood Rural Ward: Cliffe, Cliffe Woods, Cooling, Frindsbury, Wainscott and Upnor.

Hoo St Werburgh & High Halstow Ward: Chattenden, Hoo St Werburgh, High Halstow and Kingsnorth.

Cllr. Turpin (Group Whip) and Cllr. Williams (Group Member) represent Strood Rural Ward (achieving over 52.5% of the vote at the 2023 Local Election) and Cllr. Crozer (Group Leader), Cllr. Pearce (Deputy Group Leader) and Cllr. Sands (Group Member) represent Hoo St Werburgh & High Halstow Ward (achieving over 70% of the vote at the 2023 Local Election). TIG represents a clear and significant majority of the electorate on the Hoo Peninsula - a strong rural community with productive fertile agricultural land, valued landscapes, rich heritage, and internationally and nationally important habitats, supporting bio-diverse wildlife. The Hoo Peninsula is part of the proposed East Coast Wetlands designation to become a UNESCO Natural World Heritage Site.

The existing development plan for the Hoo Peninsula includes two recently adopted Neighbourhood Plans: (1) Hoo St Werburgh & Chattenden Neighbourhood Plan and (2) Cliffe & Cliffe Woods Neighbourhood Plan.

TIG also supports the residents and Parish Councils of **All Saints Ward:** Allhallows, St. Mary Hoo, Stoke and Grain.

Short Planning Representation objecting to MC/25/0006

This representation **OBJECTS** to Richborough's planning application MC/25/0006 (to build 800 houses on land off Lower Rochester Road, Wainscott) on fundamental legal and planning grounds. Read against the development plan and other material considerations, the scheme conflicts with the Medway Council Local Plan (May 2003) and key provisions of the National Planning Policy Framework (December 2024).

1. Introduction.

1.1 This objection highlights:

- Clear conflict with adopted development plan policies,
- Demonstrable harm to the countryside and designated Area of Local Landscape Importance (ALLI),
- Insufficient legal and environmental justification under the Habitats Regulations,
- Incomplete and deferred Biodiversity Net Gain evidence,
- Unsound reliance on claims relating to housing land supply,

- Unresolved transport and infrastructure impacts,
- and fundamental conflict with the NPPF's environmental and plan-led requirements.

1.2 Across the applicant's documents, the harms are admitted, while the benefits are overstated and unproven. The evidence base is either incomplete, highly assumption-driven, or reliant on mitigation that is not quantified, secured, or demonstrably effective. The proposal fails the statutory planning test under Section 38(6), fails numerous Local Plan policies, and does not achieve sustainable development under the NPPF.

2. Reasons for refusal:

2.1 R1 – Conflict with adopted Development Plan. The proposal lies outside settlement boundaries and directly conflicts with Countryside Policy BNE25, failing all qualifying tests. No material considerations justify overriding the plan.

2.2 R2 – Harm to ALLI in breach of BNE34. The application causes recognised harm to landscape character, rural identity, orchard fabric, tranquillity, and settlement separation within the Dillywood Lane ALLI. No overriding benefits have been demonstrated.

2.3 R3 – Adverse effects on rural lanes (BNE47). Highway interventions, traffic growth, and urbanising infrastructure are incompatible with the preservation of rural lane character.

2.4 R4 – Environmental unacceptability under NPPF (Dec 2024). The proposal fails the NPPF environmental objective, significantly harms natural capital, and falls short of paragraph 180 requirements to recognise and conserve countryside character.

2.5 R5 – Insufficient and unproven Biodiversity Net Gain. BNG evidence is incomplete, deferred, and fails the certainty, measurability, and deliverability tests required by both the NPPF and statute.

2.6 R6 – Unsound Habitats Regulations Assessment. The Shadow HRA is deficient in in-combination evaluation, air quality quantification, and mitigation certainty. Given the internationally protected nature of nearby sites, the level of doubt precludes lawful consent.

2.7 R7 – Failure to secure species protection. Applicant documents acknowledge harm to protected species, high post-occupation predation risk, and lack of secured receptor land or enforceable long-term management.

2.8 R8 – Transport and access impacts not acceptably mitigated. The TA cannot demonstrate realistic modal shift or sufficient non-car accessibility, nor that vehicle growth will avoid further landscape harm or congestion of rural lanes.

3. The planning balance.

3.1 Even if moderated weight were applied to certain local plan policies, the statutory starting point remains the same: determine in accordance with the development plan unless material considerations indicate otherwise.

3.2 Here:

- Landscape harm is proven and accepted by the applicant's own evidence,
- Environmental impacts are significant and inadequately mitigated,
- BNG is unproven,

- Ecology and HRA concerns remain unresolved,
- Transport evidence is speculative,
- and the benefits claimed are generic, unquantified, and insufficient to neutralise the acknowledged harms.

3.3 Housing delivery does not override the fundamental duty to safeguard designated landscapes, natural capital, and protected ecological assets. The NPPF does not sanction development that significantly harms the environment in pursuit of housing numbers. Nor does it support the erosion of Local Plan countryside protections without robust justification.

3.4 On any reasonable assessment, the adverse impacts of this proposal significantly and demonstrably outweigh the benefits when assessed against both the development plan and the NPPF taken as a whole.

4. Conclusion.

4.1 For the reasons set out above, planning application MC/25/0006 is contrary to the Medway Council Local Plan 2003, fails to comply with the NPPF (December 2024), is unsound in environmental terms, and fails to establish a lawful, policy-compliant basis for development within open countryside and a designated ALLI.

4.2 The application should therefore be **REFUSED**.

Thank you for taking the time to read this representation.

THE
INDEPENDENT
GROUP
ON MEDWAY COUNCIL

Elizabeth Turpin John Williams

Cllr. Elizabeth Turpin (Ind)

Group Whip

Strood Rural Ward

Cllr. John Williams (Ind)

Group Member

Strood Rural Ward

Written by Cllr. Elizabeth Turpin.

Please note: this representation has not been signed by Cllr. George Crozer, Cllr. Michael Pearce or Cllr. Ron Sands. Cllr. Michael Pearce is a member of the Planning Committee. When the application is decided, either Cllr. George Crozer, Cllr. Michael Pearce or Cllr. Ron Sands will sit on the committee for the application. Cllr. Elizabeth Turpin and Cllr. John Williams are Ward Councillors for where the application is located.

**THE
INDEPENDENT
GROUP
ON MEDWAY COUNCIL**

Representation concerning MC/25/0701

"Outline application with all matters reserved for construction of up to 75 dwellings with associated works and infrastructure - demolition of existing buildings and structures"

Land At Stoke Road

Hoo St Werburgh, Hoo Peninsula, Rochester, Kent, ME3 9YB

Main Planning Representation

Monday 8th December 2025

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The existing development plan for the Hoo Peninsula includes two recently adopted Neighbourhood Plans: (1) Hoo St Werburgh & Chattenden Neighbourhood Plan and (2) Cliffe & Cliffe Woods Neighbourhood Plan.

TIG also supports the residents and Parish Councils of **All Saints Ward:** Allhallows, St. Mary Hoo, Stoke and Grain.

Chapter 1 – Introduction and summary

1.1 We write to object in the strongest possible terms to planning application MC/25/0701.

1.2 We have reviewed the following submission documents:

- Air Quality Assessment (AQA)
- Biodiversity Net Gain (BNG) documents, including the Proposed On-Site BNG Plan
- Design and Access Statement (DAS)
- Ecological Impact Assessment (EcIA)
- Landscape and Visual Appraisal (LVA)
- Planning Statement
- Transport Statement (TS)
- Travel Plan (TP)

1.3 We have assessed these against:

- Hoo St Werburgh & Chattenden Neighbourhood Plan 2023–2040 (made 7th November 2024, hereafter “the Neighbourhood Plan”).

- Medway Local Plan 2003 (“MLP”, saved policies – especially S1, BNE1, BNE2, BNE25, T1, T2, T13).
- National Planning Policy Framework (NPPF) December 2024, as amended 7 February 2025.

1.4 In summary, the proposal should be refused because:

- The site is countryside beyond the settlement boundary, not allocated for housing in either the MLP or the Neighbourhood Plan, and its development would undermine the plan-led strategy for Hoo St Werburgh.
- The scheme conflicts with multiple Neighbourhood Plan policies, including those on housing growth and mix (HOO4), landscape and environment (HOO8), design (HOO6), air quality (HOO10), sustainable transport (HOO11) and paths/public rights of way (HOO12).
- It conflicts with MLP countryside, environmental and transport policies, including BNE25 (development in the countryside) and T1/T2 (highway impact and access).
- The application misapplies the NPPF tilted balance, underplaying the powerful protection afforded to up-to-date Neighbourhood Plans by paragraph 14 NPPF 2024.
- The Transport Statement and Travel Plan downplay existing and cumulative traffic problems on Stoke Road and the A228, and rely on optimistic assumptions about sustainable travel that are not supported by realistic evidence.
- The Air Quality Assessment is not robust in cumulative terms and fails to demonstrate that the development will contribute to “net improvements in air quality” as required by the NPPF and reflected in Neighbourhood Plan air quality policy (HOO10).
- The Landscape and Visual Appraisal underestimates harm to the rural landscape, the character of Stoke Road, and the experience of the bridleway RS110 and paths linking to the Saxon Shore Way, contrary to MLP BNE25 and Neighbourhood Plan Policy HOO8.
- The Ecological Impact Assessment and BNG package do not demonstrate a robust and deliverable minimum 10% BNG in accordance with the Environment Act 2021 and NPPF biodiversity objectives, and the key BNG metric spreadsheet is not accessible to the public for scrutiny.
- There are concerns about legal compliance and soundness – including the way public rights of way are treated, the adequacy of the environmental information (particularly cumulative impacts), and reliance on outline parameters that are too loose to guarantee policy-compliant implementation.

1.5 The remainder of this representation sets out these concerns in detail, chapter by chapter.

Chapter 2 – Site, proposal and context

2.1 The application site comprises predominantly open land in equine use, together with the redundant VHF mast and related structures.

It lies on the north side of Stoke Road, with the Walnut Grange development immediately to the west, agricultural land to the north and east, and a frontage of around 200m to Stoke Road.

2.2 A Public Right of Way (bridleway RS110) crosses the site north-west to south-east, linking the A228 Peninsula Way to Stoke Road and forming part of a wider network connecting to the Saxon Shore Way and Abbots Court/Vicarage Lane.

2.3 The outline application seeks up to 75 dwellings at around 38dph, arranged in three main development parcels straddling the bridleway, with a drainage basin in the south-east corner.

2.4 The DAS and TS/TP show two mutually exclusive, indicative vehicular access options:

- Option 1 – via Walnut Tree Grove, a residential cul-de-sac serving the existing Jones Homes development.
- Option 2 – direct onto Stoke Road via a new priority junction.

2.5 This is a greenfield, edge-of-settlement site, outside the settlement boundary defined in the Medway Local Plan Proposals Map and outside any housing allocations in the Neighbourhood Plan.

2.6 The applicant relies heavily on Medway Council's 3.1-year housing land supply (as at 31 March 2024) and 72% Housing Delivery Test result (2023) to assert that the presumption in favour of sustainable development ("tilted balance") is engaged and that countryside protections are out-of-date.

2.7 That approach is selective and incomplete because it underplays the status of the Neighbourhood Plan (made November 2024) and the explicit protection afforded by paragraph 14 NPPF 2024, discussed below.

Chapter 3 – Development Plan and national policy framework

3.1 Development plan

3.1.1 Under section 38(6) of the 2004 Act, decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

3.1.2 For this application, the development plan comprises:

- The saved policies of the Medway Local Plan 2003 (MLP).
- The Hoo St Werburgh & Chattenden Neighbourhood Plan 2023–2040 (made 7 November 2024).

3.1.3 Relevant MLP policies include (among others):

- S1 – sustainable development strategy.
- BNE1/BNE2 – general design and amenity.
- BNE25 – development in the countryside, limiting development outside settlement boundaries to specific rural uses and requiring protection of countryside character.
- T1/T2 – impact on the highway network and provision of safe access.
- T13 – parking standards.

3.1.4 The Neighbourhood Plan is recent and directly focused on managing growth at Hoo St Werburgh and Chattenden. Relevant policies include (titles as set out in the plan):

- HOO4 – Housing Growth and Mix
- HOO6 – Design of Development
- HOO8 – Landscape and Environment
- HOO10 – Air Quality and Climate Change / Pollution

- HOO11 – Sustainable Transport and Active Travel
- HOO12 – Paths, Public Rights of Way and Green Links

3.1.5 Those policies give a clear, locally derived spatial strategy, emphasising controlled, plan-led growth, protection of landscape and settlement edges, better air quality, and genuinely sustainable movement patterns.

3.2 National Planning Policy Framework (December 2024)

3.2.1 The NPPF 2024 is a material consideration, but it does not displace the primacy of the development plan. Paragraph 11 sets out the presumption in favour of sustainable development, and paragraph 11(d) explains when the “tilted balance” applies (for example where policies most important for the decision are out-of-date, including due to 5YHLS shortfall).

3.2.2 Crucially, paragraph 14 states that, where the presumption in paragraph 11(d) applies to housing proposals, the adverse impacts of allowing development that conflicts with a Neighbourhood Plan are likely to significantly and demonstrably outweigh the benefits, provided:

- the Neighbourhood Plan became part of the development plan within the last 5 years, and
- it contains policies and allocations to meet its identified housing requirement.

3.2.3 The Hoo St Werburgh & Chattenden Neighbourhood Plan was made in November 2024, well within the five-year window, and includes housing policies and allocations.

3.2.4 Accordingly, even if the presumption in favour of sustainable development is engaged due to Medway Council’s housing land supply position, paragraph 14 NPPF strongly re-trots the balance in favour of the Neighbourhood Plan and against speculative proposals which conflict with it – such as this one.

Chapter 4 – Principle of development and conflict with the Neighbourhood Plan

4.1 Outside the settlement boundary and not allocated

4.1.1 The Planning Statement acknowledges that the site lies outside the Hoo St Werburgh settlement boundary in the adopted MLP.

It is not a Neighbourhood Plan allocation.

4.1.2 The Neighbourhood Plan sets out a clear strategy for where housing growth should go in Hoo St Werburgh and Chattenden. Policy HOO4 is the central housing growth policy, identifying how and where housing needs are to be met over the plan period.

4.1.3 The application site does not form part of those allocations. To grant permission here would therefore:

- Undermine the plan-led distribution of housing agreed through local democratic processes and a referendum.
- Open the door to further incremental incursions into the countryside around Hoo, contrary to the strategy of containing growth and protecting landscape/settlement edges.

4.2 Misuse of the tilted balance and paragraph 14

4.2.1 The Planning Statement asserts that, because MLP policies are “time-expired” and Medway Council cannot demonstrate a 5YHLS, all countryside policies should be treated as out-of-date and the tilted balance should simply be applied.

4.2.2 That is an incomplete reading of the NPPF. Paragraph 14 NPPF 2024 expressly provides that where the presumption applies and the proposal conflicts with an up-to-date Neighbourhood Plan (less than 5 years old and with housing allocations), the adverse impacts of losing that plan-led approach are likely to significantly and demonstrably outweigh the benefits.

4.2.3 The Neighbourhood Plan for Hoo St Werburgh and Chattenden is very recent (November 2024) and provides precisely the housing policies and allocations envisaged by paragraph 14.

4.2.4 In these circumstances:

- The Neighbourhood Plan must be given full statutory weight as part of the development plan.
- The tilted balance cannot be treated as trumping neighbourhood policies; rather, NPPF paragraph 14 indicates that conflict with the Neighbourhood Plan is itself likely to tip the balance against granting permission.

4.2.5 The Planning Statement barely engages with paragraph 14 at all, and more generally downplays the Neighbourhood Plan. That is a serious flaw in the applicant’s policy analysis and renders the Planning Statement unsound as a basis for decision-making.

Chapter 5 – Conflict with the Medway Local Plan 2003

5.1 Countryside protection – Policy BNE25

5.1.1 The site lies outside the urban/rural settlement boundary and is therefore countryside for the purposes of MLP Policy BNE25.

5.1.2 Policy BNE25 restricts development in the countryside to specific categories (such as agriculture, forestry and other rural uses) and requires that development:

- Maintains and, where possible, enhances the character, amenity and functioning of the countryside, and
- Is appropriate in location and scale.

5.1.3 A 75-dwelling suburban housing estate is plainly not one of the rural exception categories and would fundamentally urbanise this stretch of countryside, contrary to BNE25.

5.1.4 The Planning Statement’s attempt to dismiss BNE25 as “time-expired” is not accepted. The underlying objective – protecting the countryside from unsustainable sprawl – is squarely supported by the NPPF’s emphasis on using brownfield land, protecting valued landscapes and avoiding car-dependent patterns of growth.

5.2 Transport and access – Policies T1 and T2

5.2.1 MLP Policy T1 requires that development does not individually or cumulatively cause a significant increase in risk of accidents or congestion, and does not conflict with capacity or safety on the highway network.

5.2.2 Policy T2 requires safe highway access arrangements.

5.2.3 As set out in Chapter 6, the Transport Statement underestimates:

- Existing traffic pressures on Stoke Road and the A228;
- The cumulative impact of substantial committed development at Hoo St Werburgh (including MC/23/2857 and other recent schemes along Stoke Road); and
- The safety and capacity implications of an additional access via either Walnut Tree Grove or a new junction on Stoke Road.

5.2.4 On a proper assessment, the scheme is likely to conflict with Policies T1 and T2.

Chapter 6 – Transport, access and sustainable travel

6.1 Over-optimistic reliance on walking and cycling

6.1.1 The TS and TP highlight:

- A 2m footway on the south side of Stoke Road and an overgrown 1.5m footway on the north side;
- The presence of National Cycle Route 179 and other leisure cycle routes; and
- The public rights of way network, including bridleway RS110 and connections to the Saxon Shore Way.

6.1.2 From this, the TS and TP infer that the site is highly accessible by sustainable modes.

6.1.3 However:

- Many of the referenced cycle routes are long-distance recreational routes, not everyday commuting or school travel corridors.
- The northern footway on Stoke Road is acknowledged as overgrown, undermining safe pedestrian use.
- The route to key services (secondary school, employment areas, main bus stops) entails walking or cycling along heavily trafficked roads, with significant HGV and commuter flows.

6.1.4 The TS/TP fail to provide robust evidence of existing or realistic future mode share for walking and cycling, and provide no binding commitments to deliver off-site improvements that would materially change behaviour.

6.2 Bus access and realistic mode share

6.2.1 Bus access is referenced in generic terms, but there is no detailed analysis of frequency, reliability, or capacity, nor any secured funding for service enhancement.

6.2.2 The TP sets modal shift “targets” but these are not tied to enforceable obligations, sanctions or remedial measures beyond modest voucher schemes and marketing initiatives.

6.2.3 In practice, for an edge-of-settlement, car-oriented scheme of this nature, it is highly likely that private car use will dominate, increasing traffic on Stoke Road and the A228 despite the TP’s aspirations.

6.3 Access options and local highway impact

6.3.1 Both access options raise serious concerns:

- Option 1 – Walnut Tree Grove:
 - This is a quiet residential cul-de-sac, currently serving around 65 dwellings.
 - Introducing traffic for an additional 75 dwellings (including construction traffic) would fundamentally change its character and could compromise residential amenity and safety, particularly for children and pedestrians.
- Option 2 – Stoke Road:
 - Stoke Road already carries significant traffic and is the main local distributor between Hoo St Werburgh and the A228.
 - Another priority junction close to existing junctions and access points (including the recently approved MC/23/2857 accesses) risks increasing turning conflicts, queuing and accident risk.

6.3.2 The TS relies on TRICS-based trip generation and isolated junction assessments, but there is limited analysis of cumulative effects with the substantial, recently resolved MC/23/2857 scheme (134 dwellings plus other uses) and other nearby permissions.

6.3.3 The TS therefore fails to demonstrate compliance with NPPF paragraphs 110–112 (promoting sustainable transport and ensuring safe and suitable access) and MLP Policies T1 and T2.

6.4 Deficiencies in the Travel Plan

6.4.1 The TP is explicitly labelled an “Interim” Travel Plan and defers key details to a future “Full” TP at reserved matters stage.

6.4.2 It:

- Does not set binding, time-bound mode share targets backed by secured funding.
- Relies heavily on welcome packs, vouchers and generic promotional measures, without robust evidence these will significantly reduce car use.
- Envisages monitoring and review, but this is left largely to future negotiation and is not tied to explicit triggers for further mitigation.

6.4.3 Given the scale of cumulative growth on the Hoo Peninsula and existing congestion on the A228, this high-level approach does not meet the standard required by NPPF and Medway Council’s Local Transport Plan objectives for genuinely sustainable travel.

Chapter 7 – Air quality

7.1 The Air Quality Assessment (AQA) seeks to demonstrate acceptable air quality at the site and negligible impact on existing receptors.

7.2 However:

- The AQA relies on forecast background improvements in emissions and air quality that may not materialise, particularly given the high and growing traffic on the A228 and through Medway's AQMAs.
- There is limited cumulative assessment with the significant MC/23/2857 scheme and other recent consents feeding into the same network.
- Sensitivity testing for pessimistic traffic growth or slower fleet improvement appears either absent or limited.

7.3 NPPF requires that development contributes to net improvements in air quality, especially in areas where air quality is already poor or where development would introduce new exposures.

7.4 The Neighbourhood Plan includes a specific air quality policy (HOO10) reflecting local concern about HGV and commuter traffic, congestion and health impacts in Hoo St Werburgh and along key corridors to the Medway towns.

7.5 In that context, it is not sufficient merely to demonstrate that modelled changes in pollutants at a small number of receptors are “negligible” in percentage terms:

- The development would add traffic to already stressed corridors;
- It offers no transformative modal shift measures; and
- It would bring additional people (including children) to live close to busy roads.

7.6 The AQA does not convincingly show alignment with local air quality objectives or Neighbourhood Plan Policy HOO10. The Planning Statement's assertion of compliance is therefore not supported by robust evidence.

Chapter 8 – Landscape, visual impact and settlement character

8.1 The Landscape and Visual Appraisal (LVA) classifies the site as having only moderate sensitivity and concludes that residual landscape and visual effects will be acceptable.

8.2 However, several matters are underplayed:

- The site forms a key part of the rural setting to the eastern edge of Hoo St Werburgh along Stoke Road.
- The presence of bridleway RS110, its connections to other paths and the Saxon Shore Way, and the historic Hoo Stop Line give this landscape both recreational and heritage value.
- The open, undeveloped nature of the land currently provides a visual and perceptual break between the expanded village and open countryside.

8.3 The DAS confirms development at around 38 dwellings per hectare, with two-storey built form and a “main street” running through the site.

This will:

- Introduce a suburban, estate-like character on currently open land;
- Significantly alter views from Stoke Road, RS110 and other local vantage points;
- Erode the sense of transition from village to countryside.

8.4 MLP Policy BNE25 requires that development in the countryside maintains and enhances its character; this scheme does the opposite.

8.5 Neighbourhood Plan Policy HOO8 (Landscape and Environment) seeks to protect key landscape features, settlement edges and views, and to avoid developments that unduly urbanise the Peninsula's landscape. The proposal fails that test.

8.6 The LVA appears to be an “appraisal” rather than a full GLVIA-grade LVIA, and it is not clear that it includes sufficiently rigorous cumulative assessment with:

- The already built Walnut Grange scheme;
- The substantial MC/23/2857 development along Stoke Road;
- Other recent or emerging proposals on the Peninsula.

8.7 On a realistic assessment, the proposal would:

- Cause material harm to the landscape and the rural setting of Hoo;
- Conflict with MLP BNE25 and Neighbourhood Plan HOO8;
- Undermine the plan-led approach to protecting the Hoo Peninsula's distinctive character.

Chapter 9 – Ecology and Biodiversity Net Gain

9.1 Ecological Impact Assessment

9.1.1 The Ecological Impact Assessment (EcIA) identifies a range of habitats and species interests on and around the site.

The land is not ecological “dead-space”; it forms part of a wider semi-rural mosaic important for species movement and connectivity.

9.1.2 The EcIA concludes that impacts can be mitigated and that, with on-site enhancements and BNG measures, the scheme will be acceptable.

9.1.3 However:

- There is limited information in the public domain about detailed survey timings and methodologies for all taxa;
- Cumulative impacts with other sizeable developments at Hoo St Werburgh – particularly on birds associated with the Thames Estuary and Marshes SPA/Ramsar – are not evidently assessed in depth;
- The relationship between the EcIA and the BNG metric is not fully transparent to the public.

9.2 Biodiversity Net Gain

9.2.1 The applicant has submitted a BNG calculation spreadsheet (xlsm) and a single-page BNG Plan showing proposed on-site interventions.

9.2.2 The Environment Act 2021 and associated regulations now require a minimum 10% biodiversity net gain for most major developments, calculated using the statutory metric and secured for at least 30 years.

9.2.3 There are several concerns:

- The BNG metric spreadsheet is not readily accessible to the public, preventing full scrutiny of baseline condition assessments, habitat distinctiveness, and post-development assumptions.
- Given the relatively small site area and the high quantum of built development (75 dwellings at 38dph) plus roads and drainage, it is questionable whether genuine 10% BNG can be achieved on-site without over-optimistic condition scoring or unrealistic management assumptions.
- The BNG Plan appears to rely heavily on multi-functional green space which will be subject to recreation pressure from residents (paths, dog-walking, informal play), potentially undermining habitat quality in practice.

9.2.4 In addition, the Planning Statement does not clearly set out:

- Whether off-site units are required (and if so where, and on what legal basis);
- How long-term management and monitoring of BNG habitats would be secured;
- How BNG interacts with any Strategic Access Management and Monitoring (SAMM) contributions for designated sites.

9.2.5 NPPF 2024 expects development to improve biodiversity and integrate net gain into green infrastructure and place-making. On the evidence available, the proposal fails to demonstrate a robust, deliverable and legally secure BNG package.

Chapter 10 – Design, place-making and living conditions

10.1 The Design and Access Statement provides an illustrative masterplan and some indicative street/character typologies but emphasises that all matters are reserved.

10.2 Key concerns include:

- Density and grain: 75 units at ~38dph on an edge-of-settlement countryside site is relatively high and risks a cramped, suburban estate form inconsistent with the rural setting and Neighbourhood Plan design aspirations (Policy HOO6).
- Relationship with Walnut Grange: There is a risk of the two schemes merging into a single large suburban mass, with no clear, well-designed edge to the countryside.
- Internal hierarchy and movement: Although a “street hierarchy” is presented, this is entirely illustrative and cannot be relied upon to ensure a permeable, pedestrian-first layout as envisaged in the Neighbourhood Plan and Manual for Streets principles, particularly given the heavy car reliance suggested by the TS/TP.

- Amenity impacts: The access via Walnut Tree Grove would funnel additional traffic past existing homes, with clear implications for noise, disturbance and safety. The DAS does not robustly address this.

10.3 Neighbourhood Plan Policy HOO6 seeks high-quality, locally distinctive design that respects the settlement's character, edges and heritage context. With the quantum of development proposed and the limited control provided at outline stage, there is a real risk that resulting reserved matters will be forced into an over-intensive layout to hit numbers, at the expense of character and amenity.

10.4 Overall, the DAS does not convincingly demonstrate that up to 75 dwellings can be accommodated on this site in a way that meets Neighbourhood Plan design policies, protects residential amenity, and complements the Hoo Stop Line heritage features.

Chapter 11 – Legal compliance, technical robustness and soundness

11.1 Public Rights of Way and the highway authority

11.1.1 Bridleway RS110 crosses the site and is a legally protected Public Right of Way.

11.1.2 While the applicant notes the bridleway and suggests it will be “retained and enhanced”, the detailed alignment, surfacing, segregation from vehicular traffic, and treatment at road crossings are:

- Left to future stages;
- Not clearly secured in the parameter plans.

11.1.3 Any diversion or downgrading of the PROW would require separate legal processes under the Highways Act or Town and Country Planning Act, with tests around necessity and merit. It is poor practice to rely on generic assurances without a robust, worked-through scheme at this stage.

11.1.4 Neighbourhood Plan Policy HOO12 specifically values paths and green links and seeks to protect and enhance them. The applicant has not shown convincingly that RS110 will be protected as a high-quality, tranquil route rather than reduced to a narrow corridor within an estate.

11.2 Environmental information and cumulative impact

11.2.1 The AQA, EcIA, LVA, TS and TP all treat cumulative effects, but generally in a limited and document-by-document way. None offers a clear, integrated view of:

- The combined effects of this and other major schemes at Hoo St Werburgh on traffic, air quality, landscape, ecology and recreation pressure;
- The implications for European and national environmental designations around the Hoo Peninsula.

11.2.2 Given the scale of growth already committed around Hoo St Werburgh and the strategically important nature of the Peninsula's habitats and landscape, there is a strong argument that cumulative impacts should be assessed much more rigorously.

11.2.3 Without this, the application risks being unsupported by adequate environmental information, making it unsafe for Medway Council to conclude there would be no significant environmental effects.

11.3 Clarity and consistency of documents

11.3.1 There are several internal inconsistencies or ambiguities, for example:

- The description of development refers to demolition of “all buildings and structures”, yet the TP indicates that the telecoms mast cabin remains between two southern parcels outside the red line, raising questions about what is actually being demolished and how the retained structure interacts with site layout.
- Key elements (such as access route choice, BNG off-site arrangements, precise PROW treatment) are deferred to later stages, despite being intrinsic to the planning acceptability of the scheme.

11.3.2 This lack of clarity undermines the ability of the public and decision-makers to understand the full impacts and to frame effective conditions and obligations. It is therefore a concern in terms of both soundness and procedural fairness.

Chapter 12 – Planning balance and conclusion

12.1 In policy terms, the starting point is the development plan: the Medway Local Plan 2003 and the Hoo St Werburgh & Chattenden Neighbourhood Plan.

12.2 The proposal is clearly and fundamentally contrary to the development plan, for reasons including:

- Location in the countryside, outside the settlement boundary and not an allocation – contrary to MLP Policy BNE25 and Neighbourhood Plan Policy HOO4.
- Harm to landscape and settlement edge character, contrary to BNE25 and HOO8.
- Inadequate sustainable transport credentials and highway safety concerns, contrary to T1/T2 and HOO11/HOO12.
- Insufficiently robust treatment of air quality and modal shift, contrary to HOO10 and NPPF requirements to contribute to net improvements in air quality.
- Uncertain and potentially inadequate BNG, conflicting with NPPF and the statutory BNG regime, as well as Neighbourhood Plan environmental objectives.

12.3 Medway Council’s housing land supply shortfall (3.1 years as at March 2024) and 72% HDT result do mean the presumption in favour of sustainable development is engaged.

12.4 However, NPPF paragraph 14 is explicit that, where that presumption applies and a proposal conflicts with an up-to-date Neighbourhood Plan with housing allocations (as here), the adverse impact of allowing such development is likely to significantly and demonstrably outweigh the benefits.

12.5 The benefits put forward – primarily:

- up to 75 dwellings (some proportion of which may be affordable),
- construction jobs,
- limited on-site green space and BNG,

do not outweigh the substantial harm to:

- the plan-led spatial strategy set by the Neighbourhood Plan;
- the countryside and landscape setting of Hoo;

- sustainable transport and air quality objectives;
- the integrity and enjoyment of public rights of way and the wider Hoo Peninsula environment.

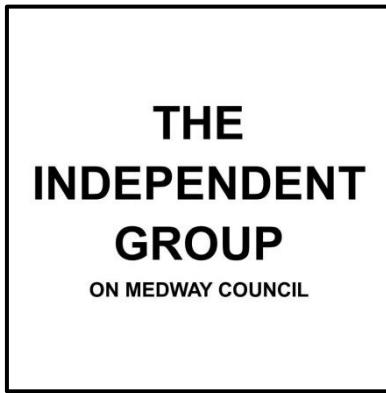
12.6 For all the reasons set out in this representation, we respectfully request that:

Medway Council **REFUSE** planning permission for application MC/25/0701.

If, contrary to this objection, officers are minded to recommend approval, the application should at the very least be:

- Reported to Planning Committee for full public debate; and
- Deferred until robust, transparent evidence is provided on transport, air quality, ecology/BNG, rights of way and compliance with the Neighbourhood Plan, with full opportunity for further public consultation.

Thank you for taking the time to read this representation.



George Crozer

Cllr. George Crozer (Ind)

Group Leader

Hoo & High Halstow Ward

Michael Pearce

Cllr. Michael Pearce (Ind)

Deputy Group Leader

Hoo & High Halstow Ward

Ron Sands

Cllr. Ron Sands (Ind)

Group Member

Hoo & High Halstow Ward

Written by Cllr. Michael Pearce.

Please note: this representation has not been signed by Cllr. Elizabeth Turpin and Cllr. John Williams - one of these Councillors will substitute for Cllr. Michael Pearce, who is a member of the Planning Committee, when the application is decided. Cllr. George Crozer, Cllr. Michael Pearce and Cllr. Ron Sands are Ward Councillors for where the application is located.

**THE
INDEPENDENT
GROUP
ON MEDWAY COUNCIL**

Representation concerning MC/25/0701

"Outline application with all matters reserved for construction of up to 75 dwellings with associated works and infrastructure - demolition of existing buildings and structures"

Land At Stoke Road

Hoo St Werburgh, Hoo Peninsula, Rochester, Kent, ME3 9YB

Habitat Regulations Representation

Monday 8th December 2025

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About The Independent Group (TIG)

The Independent Group (TIG) is a group of five Independent Councillors who sit on Medway Council. We represent the following Medway Council Wards and the following rural villages on the Hoo Peninsula in Kent:

Strood Rural Ward: Cliffe, Cliffe Woods, Cooling, Frindsbury, Wainscott and Upnor.

Hoo St Werburgh & High Halstow Ward: Chattenden, Hoo St Werburgh, High Halstow and Kingsnorth.

Cllr. Turpin and Cllr. Williams represent Strood Rural Ward (achieving over 52.5% of the vote at the 2023 Local Election) and Cllr. Crozer (Group Leader), Cllr. Pearce (Deputy Group Leader) and Cllr. Sands (Group Whip) represent Hoo St Werburgh & High Halstow Ward (achieving over 70% of the vote at the 2023 Local Election). TIG represents a clear and significant majority of the electorate on the Hoo Peninsula - a strong rural community with productive fertile agricultural land, valued landscapes, rich heritage, and internationally and nationally important habitats, supporting bio-diverse wildlife. The Hoo Peninsula is part of the proposed East Coast Wetlands designation to become a UNESCO Natural World Heritage Site.

The existing development plan for the Hoo Peninsula includes two recently adopted Neighbourhood Plans: (1) Hoo St Werburgh & Chattenden Neighbourhood Plan and (2) Cliffe & Cliffe Woods Neighbourhood Plan.

TIG also supports the residents and Parish Councils of **All Saints Ward:** Allhallows, St. Mary Hoo, Stoke and Grain.

Objection on Habitats Regulations and SPA / Ramsar grounds

We write to object to planning application MC/25/0701 on the specific ground that the application, as submitted, does not demonstrate compliance with the Conservation of Habitats and Species Regulations 2017 (as amended) (“the Habitats Regulations”) in respect of nearby European and Ramsar sites.

1. European sites and impact pathways

The applicant’s Ecological Impact Assessment (EcIA) identifies the proximity of the site to Medway Estuary and Marshes SPA / Ramsar / SSSI (and other European sites) and recognises a potential impact pathway via increased recreational pressure arising from new residents.

The EcIA acknowledges that the development would result in additional recreational use of the estuary and marshes, and that this would represent an adverse effect prior to mitigation. It is also clear that the site lies within Impact Risk Zones where Natural England expects residential development to be assessed for likely significant effects on these designated sites.

2. Legal requirements under the Habitats Regulations

Under Regulation 63 of the Habitats Regulations, before granting any consent for a plan or project which is likely to have a significant effect on a European site (either alone or in combination), the competent authority must:

- 1. Undertake a screening assessment for likely significant effect (LSE); and**
- 2. Where LSE cannot be excluded on the basis of objective information, carry out an Appropriate Assessment (AA) of implications for the site's conservation objectives.**

The Court of Justice in People Over Wind and Sweetman v Coillte Teoranta (C-323/17) held that measures intended to avoid or reduce harmful effects on a European site (i.e. mitigation) cannot be taken into account at the screening stage; such measures must instead be considered at the Appropriate Assessment stage.

Government guidance reflects this position and confirms that mitigation (including financial contributions) must not be relied upon to screen out the need for Appropriate Assessment.

3. Flaws in the applicant's approach

The EcIA suggests that:

- The application site is not Functionally Linked Land for SPA/Ramsar birds; and**
- Payment of the Strategic Access Management and Monitoring Strategy (SAMMS) contribution will address recreational impacts;**

and on that basis it asserts that no Habitats Regulations Assessment is required.

This approach is flawed for three reasons:

- 1. The EcIA itself recognises a credible impact pathway via increased recreational pressure on the Medway Estuary and Marshes SPA/Ramsar. In such circumstances, the low threshold for "likely significant effect" is clearly crossed and LSE cannot safely be ruled out at screening.**
- 2. Reliance on SAMMS payments or other mitigation to justify a "no HRA required" conclusion is directly contrary to People Over Wind, which prohibits taking mitigation into account at the screening stage. Any conclusions about mitigation and site integrity must be made through a formal Appropriate Assessment, not at screening.**
- 3. No shadow Habitats Regulations Assessment (HRA) has been submitted with the application. The only document addressing European sites is the EcIA, whose brief comments on Habitats Regulations matters do not constitute a screening determination or Appropriate Assessment by the competent authority, and do not provide a legally robust basis for such an assessment.**

In short, the application documents:

- Acknowledge a plausible risk of significant effects on a European site;**
- Seek to rely on mitigation (SAMMS) to dismiss the need for HRA;**
- But do not supply a shadow HRA or equivalent analysis for Medway Council to adopt.**

4. Consequences for decision-making

As Medway Council is the competent authority, it must itself undertake and record a Habitats Regulations Assessment for this project, including:

- A precautionary screening for likely significant effect;**
- Where LSE cannot be excluded without mitigation, a full Appropriate Assessment considering this development alone and in combination with other Hoo Peninsula schemes;**
- Formal consultation with Natural England.**

Without such an assessment, the Council would lack the lawful basis required by Regulation 63 to conclude that the project will not adversely affect the integrity of the Medway Estuary and Marshes SPA/Ramsar (and other relevant European sites).

Granting permission on the strength of the EcIA's "no HRA required" assertion would, in our view, expose the decision to a real risk of legal challenge for failure to comply with the Habitats Regulations and relevant case law.

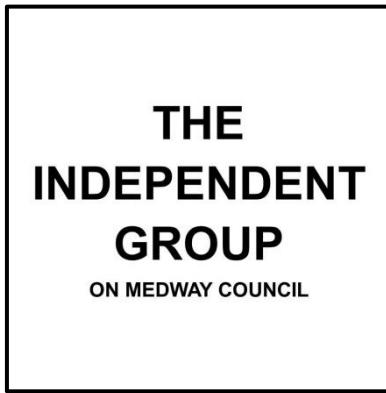
5. Requested outcome

For these reasons, we respectfully request that Medway Council:

- **Reject the EcIA's conclusion that no HRA is required;**
- **Confirm that a Habitats Regulations Assessment (screening and, if necessary, Appropriate Assessment) is needed for application MC/25/0701; and**
- **In the absence of a robust, transparent HRA demonstrating no adverse effect on site integrity, refuse planning permission on the grounds of insufficient information to rule out significant effects on European and Ramsar sites.**

If the Council is minded not to refuse outright, it should in any event defer determination until a full shadow HRA is submitted by the applicant and assessed by the Council in consultation with Natural England, with the conclusions made available for public scrutiny.

Thank you for taking the time to read this representation.



George Crozer

Cllr. George Crozer (Ind)

Group Leader

Hoo & High Halstow Ward

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Cllr. Michael Pearce (Ind)

Deputy Group Leader

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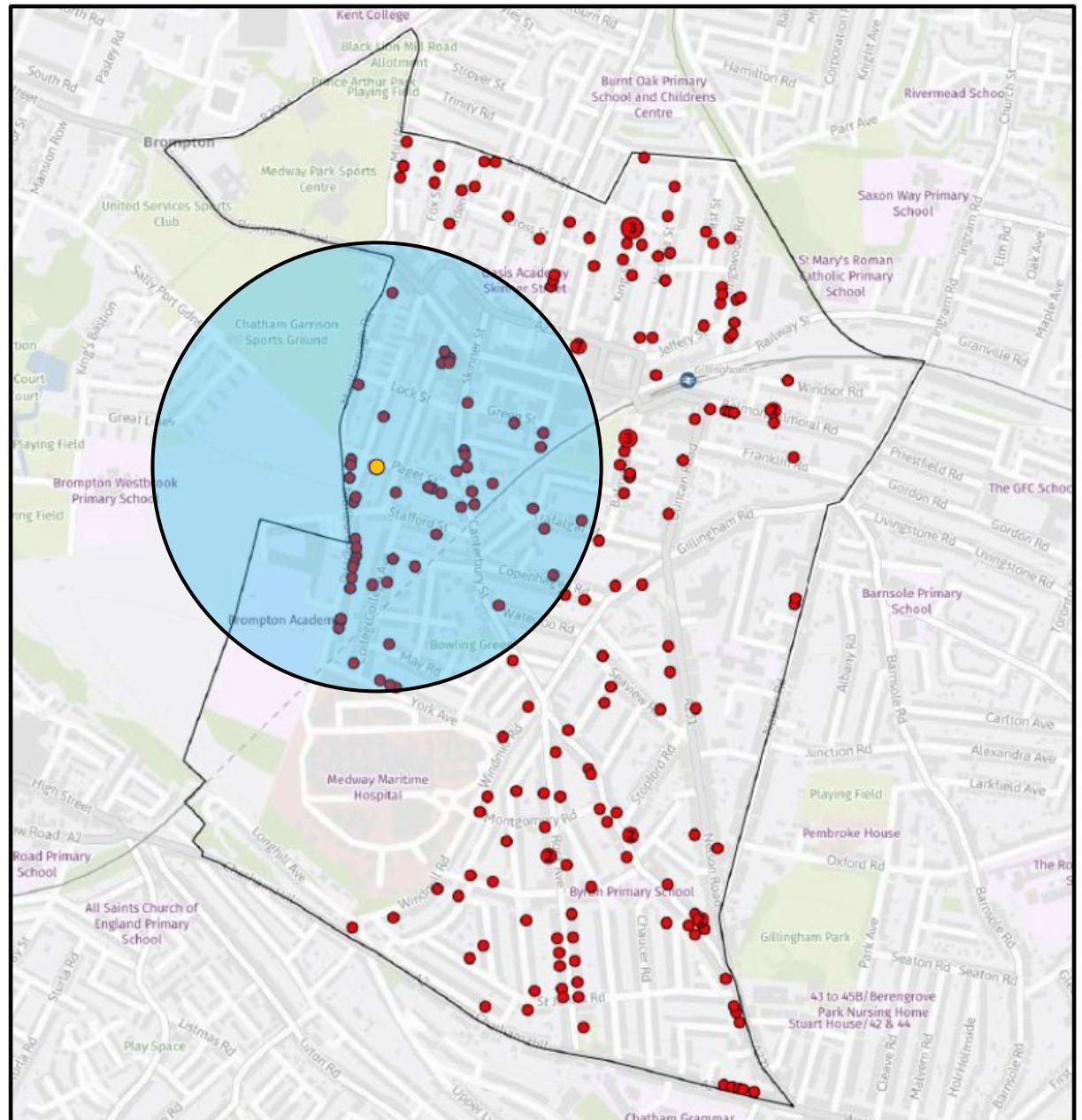
HMO Density

15 Paget Street

● - Application Property

● - HMO

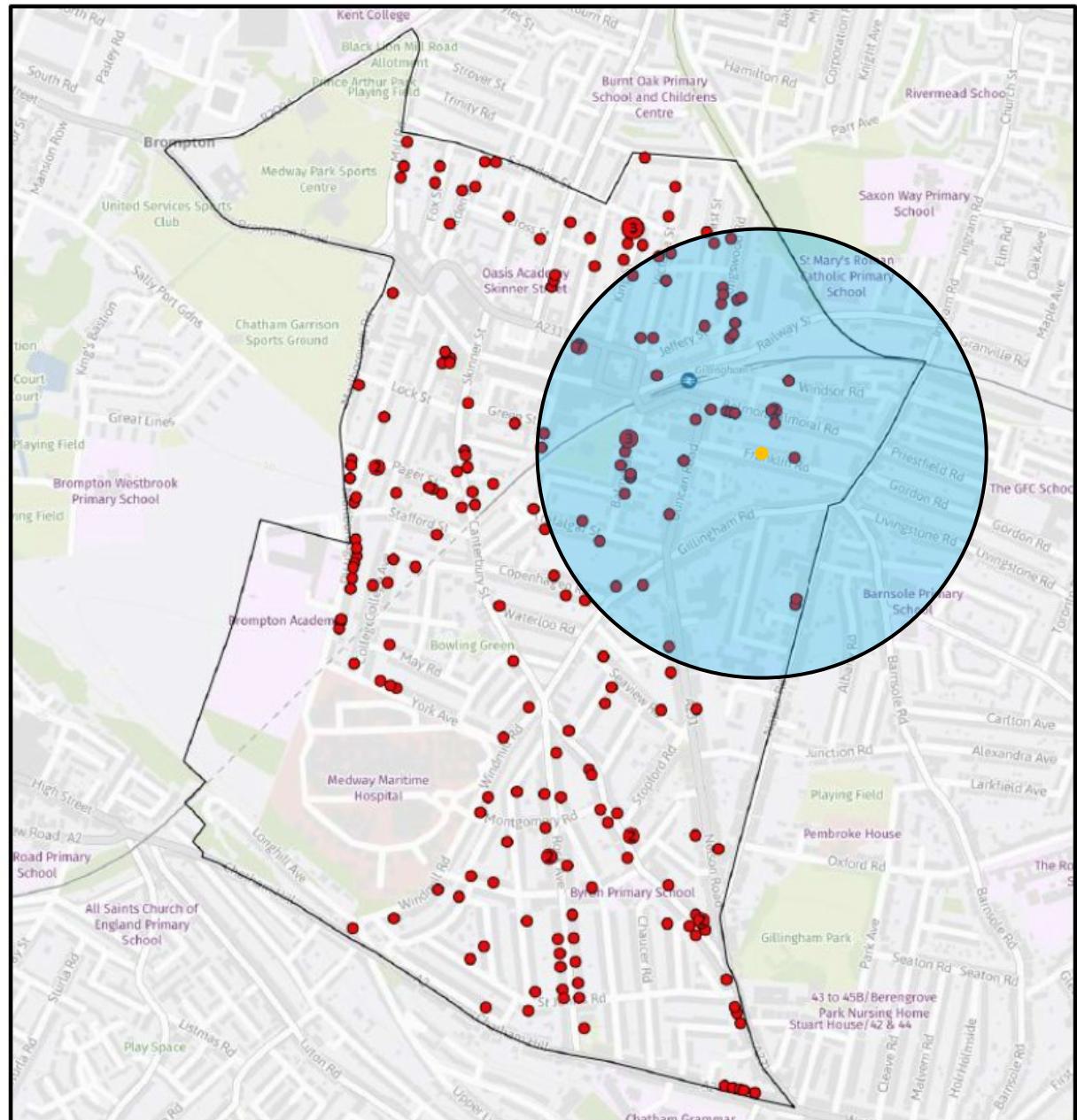
● - 500m Radius



HMO Density

25 Franklin Road

- - Application Property
- - HMO
- - 500m Radius



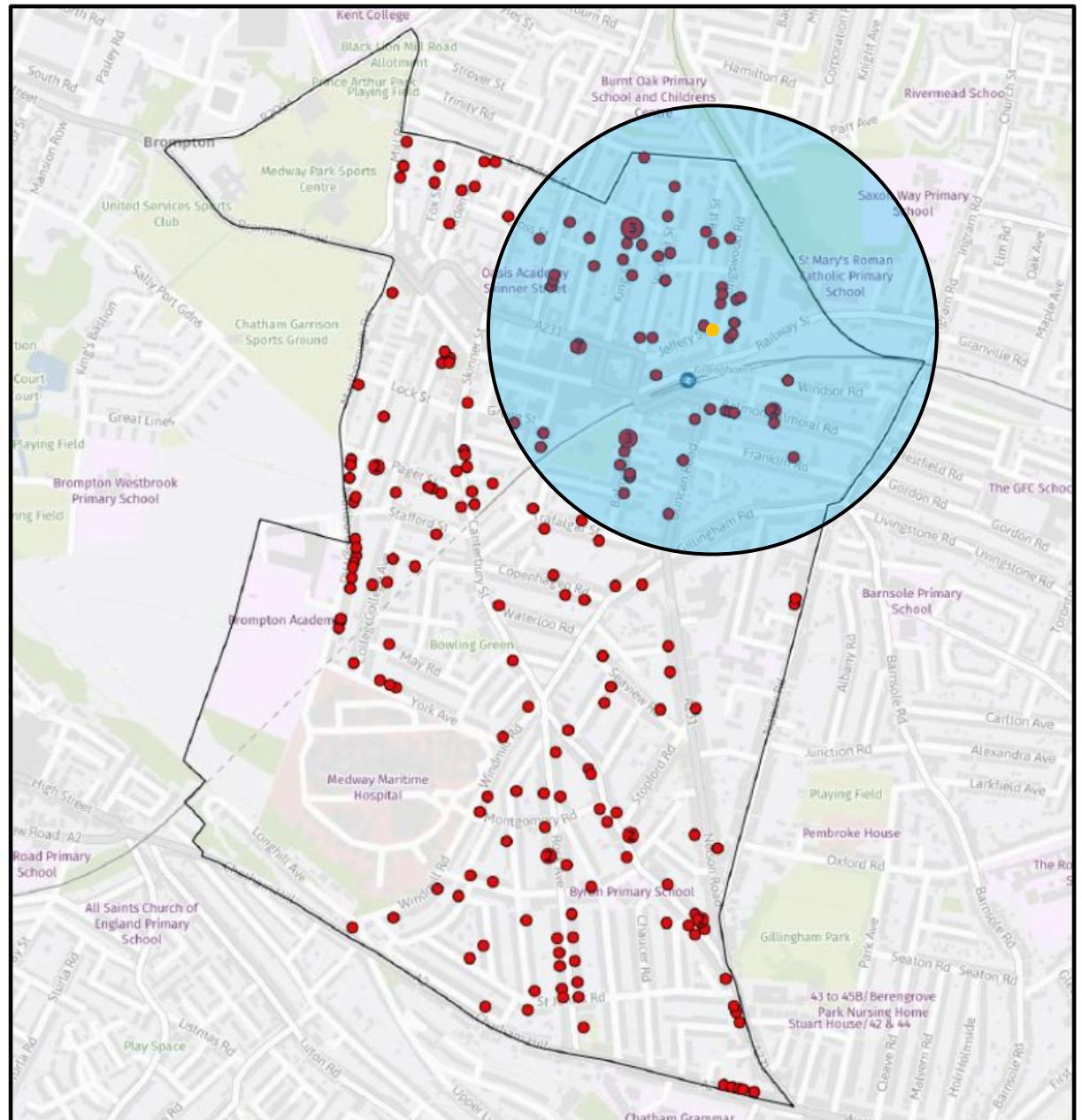
HMO Density

3 Kingswood Road

● - Application Property

● - HMO

● - 500m Radius



HMO Density

31 Stafford Street

- - Application Property
- - HMO
- - 500m Radius

