

**HOO ST WERBURGH AND CHATTENDEN NEIGHBOURHOOD PLAN
2023 - 2040**

**The Report of the Independent Examiner to Medway Council on the Hoo St
Werburgh and Chattenden Neighbourhood Plan**

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Independent Examiner
6th August 2024**

Summary

I was appointed by Medway Council, in agreement with Hoo St Werburgh and Chattenden Parish Council, in April 2024 to undertake the Independent Examination of the Hoo St Werburgh and Chattenden Neighbourhood Plan.

The Examination has been undertaken by written representations. I visited the Neighbourhood Area on 8th July 2024 after resolving my initial enquiries of the Qualifying Body.

The Neighbourhood Plan proposes a local range of policies and seeks to bring forward positive and sustainable development in the Hoo St Werburgh and Chattenden Neighbourhood Area. There is an evident focus on safeguarding the very distinctive, local character of the area whilst accommodating future change and growth.

The Plan has been underpinned by extensive community support and engagement. The social, environmental and economic aspects of the issues identified have been brought together into a coherent plan which adds appropriate local detail to sit alongside the Medway Local Plan (adopted May 2003).

Subject to a series of recommended modifications set out in this Report, some of more significance than others, I have concluded that the Hoo St Werburgh and Chattenden Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.

I recommend that the referendum should be held within the Neighbourhood Area.

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Introduction

This Report sets out the findings of the Independent Examination of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023 - 2040. The Plan was submitted to Medway Council by Hoo St Werburgh and Chattenden Parish Council in its capacity as the 'Qualifying Body' responsible for preparing the Neighbourhood Plan.

Neighbourhood Plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently incorporated within the National Planning Policy Framework (NPPF) in 2012 and this continues to be the principal element of national planning policy. A new NPPF was published in December 2023 and it is against the content of this NPPF that the Plan is examined.

This report assesses whether the Hoo St Werburgh and Chattenden Neighbourhood Plan is legally compliant and meets the 'basic conditions' that such plans are required to meet. It also considers the content of the Plan and, where necessary, recommends modifications to its policies and supporting text. This report also provides a recommendation as to whether the Hoo St Werburgh and Chattenden Neighbourhood Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Hoo St Werburgh and Chattenden Neighbourhood Plan would then be used in the process of determining planning applications within the Plan boundary as an integral part of the wider Development Plan.

The Role of the Independent Examiner

The Examiner's role is to ensure that any submitted Neighbourhood Plan meets the legislative and procedural requirements. I was appointed by Medway Council, in agreement with Hoo St Werburgh and Chattenden Parish Council, to conduct the Examination of the Hoo St Werburgh and Chattenden Neighbourhood Plan and to report my findings. I am independent of both Medway Council and the Parish Council. I do not have any interest in any land that may be affected by the Plan.

I possess the appropriate qualifications and experience to undertake this role. I have over 40 years' experience in various local authorities and third sector Body as well as with the professional body for planners in the United Kingdom. I am a Chartered Town Planner and a panel member for the Neighbourhood Planning Independent Examiner Referral Service (NPIERS). I am a Member of the Royal Town Planning Institute.

In my role as Independent Examiner I am required to recommend one of the following outcomes of the Examination:

- the Hoo St Werburgh and Chattenden Neighbourhood Plan is submitted to a referendum; or
- the Hoo St Werburgh and Chattenden Neighbourhood Plan should proceed to referendum as modified (based on my recommendations); or
- the Hoo St Werburgh and Chattenden Neighbourhood Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. If recommending that the Neighbourhood Plan should go forward to referendum, I must then consider whether or not the referendum area should extend beyond the Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 Act (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by Qualifying Body.

These are helpfully covered in the submitted Basic Conditions Statement and, subject to the contents of this Report, I can confirm that I am satisfied that each of the above points has been properly addressed and met.

In undertaking this Examination I have considered the following documents:

- Hoo St Werburgh and Chattenden Neighbourhood Plan 2023 - 2040 as submitted
- Hoo St Werburgh and Chattenden Neighbourhood Plan Design Codes (November 2021)
- Hoo St Werburgh and Chattenden Local Green Space Assessment (July 2022)
- Hoo St Werburgh and Chattenden Neighbourhood Plan Basic Conditions Statement (September 2023)
- Hoo St Werburgh and Chattenden Neighbourhood Plan Consultation Statement (September 2023)
- Draft Strategic Environment Assessment and Habitats Regulations Assessment Screening Report (April 2023)
- Content at: www.medway.gov.uk/info/200149/planning_policy/142/neighbourhood_planning/6
- Content at: www.hoosaintwerburgh-pc.gov.uk/community/hoo-st-werburgh-and-chattenden-parish-council-13487/np-regulation-16-consultation/
- Representations made to the Regulation 16 public consultation on the Hoo St Werburgh and Chattenden Neighbourhood Plan
- The Medway Local Plan adopted in 2003
- National Planning Policy Framework (NPPF) (2023)
- Neighbourhood Planning Regulations (2012)
- Planning Practice Guidance (PPG) (March 2014 and subsequent updates)

I carried out an unaccompanied visit to the Neighbourhood Area on 8th July 2024. I looked at all the various sites and locations identified in the Plan document in their rural setting. This visit did not give rise to any further queries.

The legislation establishes that, as a general rule, Neighbourhood Plan examinations should be held without a public hearing, by written representations only. Having considered all the information before me, including the representations made to the submitted plan which I felt made their points with clarity, I was satisfied that the Hoo St Werburgh and Chattenden Neighbourhood Plan could be examined without the need for a public hearing and I advised Medway Council accordingly. The Qualifying Body and the Local Planning Authority have helpfully responded to my enquiries so that I may have a thorough understanding of the facts and thinking behind the Plan, and the correspondence is being shown on Medway Council's Neighbourhood Planning website for the Hoo St Werburgh and Chattenden Neighbourhood Plan.

Hoo St Werburgh and Chattenden Neighbourhood Area

A map showing the boundary of the Hoo St Werburgh and Chattenden Neighbourhood Area has been provided within the Neighbourhood Plan. Further to an application made by Hoo St

Werburgh and Chattenden Parish Council, Medway Council approved the designation of the Neighbourhood Area on 18th December 2018. This satisfied the requirement in line with the purposes of preparing a Neighbourhood Plan under section 61G(1) of the Town and Country Planning Act 1990 (as amended).

Consultation

In accordance with the Neighbourhood Planning (General) Regulations 2012, the Qualifying Body has prepared a Consultation Statement to accompany the Plan.

The Planning Practice Guidance says:

“A qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan [or Order] and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging Neighbourhood Plan [or Order]
- is made aware of how their views have informed the draft Neighbourhood Plan [or Order].” (Reference ID: 41-047-20140306)

The submitted Consultation Statement notes that (para 2.1):

“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 the Parish.
- The Plan being also publicised in the local village magazine.”

I note that, in relation to the Regulation 14 Consultation:

- This was advertised on the Parish Council web site and in Village Voices (which is sent to every home), contact was made with 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.
- Copies of the Neighbourhood Plan were placed in the library, Chat community centre, village café and the Parish 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.

The Parish Council has submitted in relation to the Regulation 14 Consultation that:

The Plan was at a ‘formative stage’, so capable of amendment.

The Plan was made available, with supporting information, to allow ‘intelligent consideration’.

The consultation was open for six weeks, so allowed ‘adequate time for consideration and response’.

Representations made were given ‘conscientious consideration’, as set out in the fourth section of the Consultation Statement.

Accordingly, overall, I am satisfied that the consultation process accords with the requirements of the Regulations and the Practice Guidance and that, having regard to national policy and guidance, the Basic Conditions have been met. In reaching my own conclusions about the specifics of the content of the Plan I may later note points of agreement or disagreement with Regulation 16 representations, just as the Qualifying Body have already done for earlier consultations. That does not imply or suggest that the consultation has been inadequate, merely that a test against the Basic Conditions is being applied.

Representations Received

Consultation on the submitted Plan, in accordance with Neighbourhood Planning Regulation 16, was undertaken by Medway Council from 8th January to 19th February 2024. I have been passed the representations – 21 in total – which were generated by the consultation and which are included along with the submitted Plan on Medway Council's Neighbourhood Planning website. I have not mentioned every representation individually within this Report but this is not because they have not been thoroughly read and considered in relation to my Examiner role, rather their detail may not be relevant to ensuring that the Basic Conditions are met.

The Neighbourhood Plan

Hoo St Werburgh and Chattenden Parish Council is to be congratulated on their extensive efforts to produce a Neighbourhood Plan for their area that will guide development activity over the period to 2040. I can see that a sustained effort has been put into developing a Plan around a vision for the Hoo St Werburgh and Chattenden Neighbourhood Plan:

“To support sustainable growth and development to meet diverse local needs, addressing Climate Change, and preserving or enhancing the distinctive character and local facilities of the parish, the village of Hoo St Werburgh and hamlet of Chattenden and their rural landscape settings.”

The Plan document is well presented with a combination of text, maps and policies that are, subject to the specific points that I make below, well laid out and helpful for the reader. The Plan has been kept to a reasonably manageable length by not overextending the potential subject matter and the coverage of that.

It is an expectation of Neighbourhood Plans that they should address the issues that are identified through community consultation, set within the context of higher-level planning policies. There is no prescribed content and no requirement that the robustness of proposals should be tested to the extent prescribed for Local Plans. Where there has been a failure by the Qualifying Body to address an issue in the round, leading to an inadequate statement of policy, it is part of my role wherever possible to see that the community's intent is sustained in an appropriately modified wording for the policy. It is evident that the community has made positive use of “direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area” (Planning Practice Guidance Reference ID: 41-001-20140306).

Individually, I can see that the Policies address legitimate matters for a Neighbourhood Plan as identified with the community. I will later look at the Policies in turn so as to ensure that the Basic Conditions are met, which include an obligation to be in general conformity with Local Plan strategic policies. Having considered all the evidence and representations submitted as part of the Examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It works from a positive vision for the future of the Neighbourhood Area and promotes policies that are, subject to amendment

to variable degrees, proportionate and sustainable. The Plan sets out the community's priorities whilst seeking to identify and safeguard Hoo St Werburgh and Chattenden's distinctive features and character. The plan-making had to find ways to reconcile the external challenges that are perceived as likely to affect the area with the positive vision agreed with the community. All such difficult tasks were approached with transparency, with input as required and support from the Medway Council.

However, in the writing up of the work into the Plan document, it is sometimes the case that the phraseology is imprecise, not helpful, or it falls short in justifying aspects of the selected policy. This is not uncommon in a community-prepared planning document and something that can readily be addressed in most instances. Accordingly, I have been obliged to recommend modifications so as to ensure both clarity and meeting of the 'Basic Conditions'. In particular, Plan policies as submitted may not meet the obligation to "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" (NPPF para 16). I bring this particular reference to the fore because it will be evident as I examine the policies individually and consider whether they meet or can meet the 'Basic Conditions'.

Basic Conditions

The Independent Examiner is required to consider whether a Neighbourhood Plan meets the "Basic Conditions", as set out in law following the Localism Act 2011; in December 2018 a fifth Basic Condition was added relating to the Conservation of Habitats and Species Regulations 2017. In order to meet the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the Plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations;
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(d).

The submitted Basic Conditions Statement has very helpfully set out to address the issues in relation to these requirements in the same order as above and has tabulated the relationship between the policy content of the Plan and its higher tier equivalents. I note that the local strategic policies are set out in the Medway Local Plan adopted in 2003. From the accompanying Strategic Environmental Assessment and Habitats Regulations Screening Report, I will later resolve whether the making of the Plan will breach the Basic Condition relating to the Habitats and Species Regulations 2017.

I have examined and will below consider the Neighbourhood Plan against all of the Basic Conditions above, utilising the supporting material provided via the Basic Conditions Statement and other available evidence as appropriate.

Contentious Issues

The emerging Local Plan

Although it is evident that the Neighbourhood Plan has been prepared during a period of fast change with the preparation of a replacement Medway Local Plan (and now a change of Government), the local planning authority's comment that "The draft NP is largely silent on the potential for significant change in the parish, that may follow from the Medway Local Plan" does deserve some response. Fundamentally I must note that the Examination is not required to and will not assess the Neighbourhood Plan content against the still emerging Local Plan. The Basic Conditions require a test against the *adopted* Local Plan, although

Planning Practice Guidance says: “The local planning authority should work with the qualifying body so that complementary neighbourhood and emerging local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan” (Paragraph: 009 Reference ID: 41-009-20190509). There is therefore no value in Neighbourhood Plans even attempting to upstage the strategic content of an emerging Local Plan.

I note that a representation on behalf of major developers is concerned that Policies HOO1 & HOO2 should include the phrase “In addition, strategic sites allocated in the adopted or emerging local plan will be supported”. This is entirely inappropriate because strategic matters are exclusively for the Local Plan to determine and the Neighbourhood Plan cannot “support” content as yet undefined. However, for reader clarity, since the Neighbourhood Plan is being prepared in advance of the new Local Plan, I can see that an explanatory sentence may be helpful; this will be addressed below.

A separate representation notes the inclusion of the following wording in another local Neighbourhood Plan:

“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 [2025]. In addition, applications are likely to be received and may be approved before the Local Plan is adopted. 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.” (Page 19, Cliffe and Cliffe Woods Neighbourhood Plan (May 2023)). The Qualifying Body did not comment directly on the potential use of such wording but did say: “Medway Council has suggested a disproportionate amount of growth for the Parish, despite the environmental impact and lack of clear planning rationale, and the Parish Council objected strongly to the Regulation 18 consultation” whilst adding “The Neighbourhood Plan does not allocate sites, but does accommodate growth in various ways”. My recommendations will have appropriate regard for this context.

The representation from Homes England suggests that such a background statement should go further: “it is maintained that the Neighbourhood Plan should support, in principle, the allocation of appropriate previously developed sites within the former MoD site (now Homes England’s Landholdings), i.e. the land at Lodge Hill Camp and Chattenden Barracks.” They note correctly that Previously Developed Land is, in principle, acceptable for development; as that principle is set at the national level it will not be altered or need reinforcement by a Neighbourhood Plan. And as the Qualifying Body noted to me: “the Parish Council recognises that the sites in question are brownfield sites, at least in part, so suitable housing development could comply with national policy. The Rationale to [Policy] HOO4 was amended at the Regulation 14 stage to mention the Homes England land at Lodge Hill Camp and Chattenden Barracks”.

Allocations of land for housing

Not unexpectedly, representations from developers express disappointment that the Neighbourhood Plan has not taken the opportunity to allocate land for housing. As the national Planning Policy Guidance confirms (Paragraph: 040 Reference ID: 41-040-20160211), “Neighbourhood plans are not obliged to contain policies addressing all types of development”. However, it is a Basic Condition that Neighbourhood Plans must support

sustainable development and representations have expressed a concern that Policies should not unreasonably constrain strategic housing delivery. National Planning Policy Guidance notes: “Neighbourhood plans may also contain policies on the contributions expected from development, but these and *any other requirements placed on development* [my emphasis] should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy” (Paragraph: 005 Reference ID: 41-005-20190509). Where appropriate, I will address this issue as Policies are considered below.

Villages and hamlets

I note that some issue has been taken with the use of these terms in a local context. There is no national approach to defining settlement hierarchies. It is possible that the new Local Plan will, for policy purposes, define a hierarchy using terms consistently across Medway – but this will not stop local people using the term they prefer. I note that, for instance, Moseley is a suburb in Birmingham but has preferred to retain its name as Moseley Village. The important consideration is that Policies should not give rise to ambiguity and that will be the basis for my recommendations.

The Plan in Detail

I will address the aspects of the Area Neighbourhood Plan content that are relevant to the Examination in the same sequence as the Plan. Recommendations are identified with a bold heading and italics, and I have brought them together as a list at the end of the Report.

Format

I noted to the Qualifying Body that many Neighbourhood Plans have found it helpful, both in their preparation and their implementation, to use paragraph numbers across the whole text, usually separately between sections eg 2.10. This allows for content to be readily referenced in Committee Reports and Decision Notices, as required, which in turn helps with the implementation of Plan Policies and demonstrating how the Plan is making a difference. The Qualifying Body noted that the policies already have a numbering system and suggested that a useful approach may be to number sub-headings (for example 5.1, 5.2, etc.), by which I believe is also meant 5.1.1 etc. This is therefore the basis for my recommendation below. I also commented that referencing maps appropriately within the text would be helpful to readability, and the Qualifying Body agreed. I further recommend that other documents/reports mentioned in the text should, either in footnotes and/or a references index, have a detailed source reference (with hyperlink for on-line readers) such that there is easy access to and no ambiguity about the content being relied upon.

Front cover

A Neighbourhood Plan must specify the period during which it is to have effect. I noted that there is no reference to the Plan period on the front cover. Within the Plan at paragraph 1.2 there is a reference to the Plan end-date as being 2040. I note that the proposed end-date for the new Medway Local Plan is 2041. However, there is no expectation that Neighbourhood and Local Plans should have common timeframes, and at this stage it is possible that the Local Plan end-date will shift again. As the Plan was submitted to Medway Council in 2023, I will recommend that the Plan period to be shown on the front cover should be 2023 – 2040. The references to “Regulation 15 Version V4.8” can now be removed.

1 INTRODUCTION

1.1 Purpose of the Neighbourhood Plan

I note that it is stated here that “This plan does not make additional site allocations” which rather begs the question, “additional” to what? The Qualifying Body responded that: “this was written some time ago and it was envisaged that the Local Plan would have been at a later stage by now”. An amendment is therefore appropriate to avoid confusion.

1.2 Status of the Neighbourhood Plan

Whilst I note the intention that the Plan should cover the period to 2040, it is not entirely correct to state: “The Neighbourhood Plan will be in force until the end of 2040”. As the Planning Practice Guidance makes clear: “There is no requirement to review or update a neighbourhood plan. However, policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan covering the neighbourhood area that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence. In addition, where a policy has been in force for a period of time, other material considerations may be given greater weight in planning decisions as the evidence base for the plan policy becomes less robust” (Paragraph: 084 Reference ID: 41-084-20190509). Therefore, to be effective, it is likely that the Plan will need to be reviewed before 2030.

Map 1

The Neighbourhood Plan is required to include a map of the designated “Neighbourhood Area”. I note that Map 1 provides the required detail, although the title – and the Key - should say ‘Neighbourhood Area’ – as this was specifically what was designated by Medway Council - rather than “Neighbourhood Plan Area”.

Recommendation 1:

1.1 Amend the front cover to show a Plan period of ‘2023 – 2040’; references to “Regulation 15 Version V4.8” can now be removed.

1.2 Amend the Plan format to include consistent sub-paragraph numbering and consistent map referencing as appropriate within the text. Either through footnotes or other appropriate means, ensure that documents mentioned within the text are fully source referenced.

1.3 Under the heading “1.1 Purpose of the Neighbourhood Plan” replace the third paragraph with:

‘The Hoo Neighbourhood Plan has been prepared in advance of the new Medway Local Plan which will include a positive strategy for growth for the local authority area. This Plan does not make development site allocations, since these will be forthcoming within the Local Plan, but it does make provision for growth in its policies, including support for employment, residential and community facilities. At the same time, there are policies on design, the environment and transport which can help to ensure that local development is sustainable, environmentally, socially, and economically.’

1.4 Under the heading “1.2 Status of the Neighbourhood Plan” replace “The Neighbourhood Plan will be in force until the end of 2040” with ‘The Plan is intended to cover the period until 2040, but it is likely that the Plan will need a review during that period’.

1.5 For Map1 amend the title and add a key to say ‘Neighbourhood Area’ (rather than “Neighbourhood Plan Area”).

2. BACKGROUND INFORMATION

2.1 The Area – Key Characteristics

I note the data that shows the local population has nearly doubled since 2001, but without further similar evidence the assertion that “Expansion of the population has not been matched by the necessary expansion or improvement of transport and community infrastructure, including health and educational provision” may be purely anecdotal. Therefore, it would be fairer to say that feedback from community engagement has suggested that expansion of the population has yet to be matched by an equivalent

expansion or improvement of transport and community infrastructure, including health and educational provision.

2.2 Engagement with the Community

No comments.

2.3 Liaison with Medway Council

I note the comment that “Medway’s Local Housing Needs Assessment identifies a need for 1667 homes a year (March 2023)” but there is no indication as to how much of this increase might be sought within the Parish. It is then noted that this figure may yet change. Rather than provide a detail that is not relevant to the Plan’s policies, better to include here a sentence acknowledging that meeting the strategic housing requirements through the Local Plan will have an impact within the Parish. The Qualifying Body has suggested the following on which my recommendation will be based:

‘The emerging Medway Local Plan proposes strategic housing site allocations, including several sites within the Parish. The Neighbourhood Plan does not allocate sites, but does accommodate growth in various ways. Any sites allocated in a new adopted local plan would be subject to the aims and policies in this Neighbourhood Plan, for example relating to design and infrastructure’.

Recommendation 2:

2.1 Under the heading “2.1 The Area – Key Characteristics” replace “Expansion of the population has not been matched by the necessary expansion or improvement of transport and community infrastructure, including health and educational provision” with ‘Feedback from community engagement has suggested that expansion of the population has yet to be matched by an equivalent expansion or improvement of transport and community infrastructure, including health and educational provision.’

2.2 Under the heading “2.3 Liaison with Medway Council” replace “Medway’s Local Housing Needs Assessment identifies a need for 1667 homes a year (March 2023). However, national Government is considering housing figures again, so this figure is likely to change” with ‘The emerging Medway Local Plan proposes strategic housing site allocations, including several sites within the Parish. The Neighbourhood Plan does not allocate sites, but does accommodate growth in various ways. Development proposals for the sites allocated in the Local Plan, once adopted, will need to address the policies in this Neighbourhood Plan, for example relating to design and infrastructure’.

3. VISION AND AIMS

3.1 Vision

No comments.

3.2 Planning Aims

No comments.

4. EMPLOYMENT AND COMMUNITY FACILITIES

HOO1: Village Centres and Employment

This Policy aims to support the further development of employment opportunities, which accords with the expectations of the NPPF section 6 “Building a strong, competitive economy”. A number of queries arose from lack of clarity with the wording within this section and its Policy, particularly in relation to the identification of “village centres”. The Qualifying Body suggested revised wording for Policy HOO1 upon which my Recommendation is based (subject to removing duplication of content in Policy HOO2).

Recommendation 3:

3.1 Replace Policy HOO1 with the following:

‘Employment Development

1. Employment development is supported in principle and appropriately according to location through:

- a. redevelopment of brownfield sites within or adjacent to the built settlements;*
- b. redevelopment or improvement of existing employment sites.*

2. Support for employment development is subject to the site having adequate and safe access to a highway with sufficient capacity and there being no significant adverse impact on:

- a. the viability of other employment sites;*
- b. the amenities of residential properties by reason of visual intrusion, noise, dust, disturbance, vibration, vehicle movements or other impacts;*
- c. the historic environment;*
- d. the rural character, landscape and natural environment.’*

3.2 Within the related “Interpretation” delete paragraphs 4 & 5.

As amended Policy HOO1 meets the Basic Conditions.

HOO2: Community Facilities

This Policy aims to support the further development of community facilities, which accords with the expectations of the NPPF section 8 “Promoting healthy and safe communities”. Although unnumbered, Map 2 delineates “Settlement Boundaries” and I am advised by the Qualifying Body that these have not been defined specifically for the Neighbourhood Plan but rather the map is taken from a Medway Council plan – in which case the source should be referenced: ‘Medway Local Plan 2003 Policies Map’.

The (unnumbered) map showing 15-minute walking distances is not referenced within the Policy or within the supporting text. It is therefore unclear in what way it is intended to be material to the implementation of the Policy. The Qualifying Body responded that the map of community facilities could be moved to the end of the rationale, as it illustrates the range of local community facilities, their dispersed nature and their concentration in the built settlement of Hoo. This would help to create a clearer rationale for Policy HOO2. Given the vague nature of the village centre, the title could be amended to refer to ‘walkable neighbourhood’. This would also help to avoid the risk of deliberate misinterpretation of ‘15-minute neighbourhoods’. My recommendation is therefore based on these clarifications.

It is unfortunate that no attempt has been made to quantify the degree of shortfall with community facilities – this would have helped to identify priorities. Resident representations seem to concentrate on shortfalls. Similarly, some assessment of capacity within the present built up area could have helped with locational decisions. In particular the absence of any Policy mention of schools might be read to indicate that these are not a current priority. The local authority has advised: “We have sought further information from our Education Service Officers [who] have confirmed that there is pressure on school places in the Hoo and Chattenden area, and demand is forecast to outstrip the places available in local schools. The council, as the Local Education Authority, is working with local schools to explore options for expansions of existing schools. This continues on from expansions in recent years. Longer term new schools may be needed The council recognises that the service base in the rural area of the Hoo Peninsula is limited, and residents often have to travel to neighbouring towns to access services.” This further detail might therefore usefully be added to the “Interpretation” section as well as a specific mention of education facilities within the Policy.

In relation to the wording of the Policy:

1. It is unclear why the criteria of element 2 are not apparently to be applied to the element 3 “improvement and diversification of existing facilities”. The Qualifying Body responded that “The criteria in clause 2 relates (*sic*) to locational/site factors, so would not apply to existing facilities, where the use is already established”. But the locational factors may equally be relevant to decisions about whether existing schools can realistically be expanded.
2. Element 4 requires that “a similar or better facility is being provided within reasonable walking distance” but if the existing facility is poorly located then that issue could be perpetuated. The proper locational requirements are set out at element 1. The Qualifying Body agreed.
3. In relation to the supporting text, it must be doubtful that there is open market for all community facilities eg the library. There are probably other data that might be used in providing a convincing case of non-viability, and the Qualifying Body noted reference to ‘need’ should be added.

Recommendation 4

4.1 Number the Map on page 26 ‘Map 3’ and add the source as ‘Medway Local Plan 2003 Policies Map’. Reference Map 3 within the Policy.

4.2 Number the Map on page 27 as ‘Map 2’ and retitle it as ‘Local Facilities within the Walkable Neighbourhoods of Hoo and Chattenden’. Move the map to the end of the “Rationale” section, before the Policy.

4.3 Add a new paragraph within the “Rationale” section along these lines:

‘Education Service Officers have confirmed that there is pressure on school places in the Hoo and Chattenden area, and demand is forecast to outstrip the places available in local schools. Medway Council, as the Local Education Authority, is working with local schools to explore options for expansions of existing schools. This continues on from expansions in recent years. Longer term new schools may be needed. Medway Council has recognised that the service base in the rural area of the Hoo Peninsula is limited, and residents often have to travel to neighbouring towns to access services.’

4.4 Amend Policy HOO2 as follows:

‘1. New community facilities, including health, recreation and education facilities, will be supported in the existing built settlements (as illustrated by Map 3) or in other sustainable and accessible locations within walking distance of the residential areas to be served, subject to meeting the further requirements of this Policy.

2. There is support in principle for new community facility development, and improvement and diversification of existing facilities, subject to the following criteria:

- a. A need has been established;*
- b. The site has access to a highway with sufficient capacity;*
- c. There are good pedestrian and cycle linkages;*
- d. The type and scale of the new or expanded community facilities complements any existing provision of similar facilities nearby; and*
- e. It has been established that there would be no significant adverse impact on:*
 - i. the amenities of residential properties by reason of visual intrusion, noise, dust, disturbance, vibration, vehicle movements or other impacts;*
 - ii. the historic environment (meeting the requirements of HOO7);*
 - iii. the rural character, landscape and natural environment (meeting the requirements of Policy HOO8).*

3. *Loss of existing community facilities will be supported only where:*
 - a. *It has been established that there is no need to be met;*
 - b. *A similar or better facility is being provided which meets the requirements of this Policy; or*
 - c. *It has been demonstrated with evidence that the facility is no longer viable.'*

4.5 *Within the related "Interpretation":*

4.5.1 *Within the first paragraph add 'and education' between "health" and "facilities".*

4.5.2 *Delete the second sentence of the last paragraph.*

As amended Policy HOO2 meets the Basic Conditions.

HOO3: Industry and Distribution

This Policy supports further development of specific employment areas, which accords with the expectations of the NPPF section 6 "Building a strong, competitive economy". I raised a number of queries regarding the clarity of Policy HOO3. In response the Qualifying Body suggested a Policy rewording. For the two named sites I am not presented with any evidence as to capacity for further development but both are named within Local Plan Policy ED1 as supported for further development. However, the Local Plan Policy differentiates between Kingsnorth – business, industrial and distribution uses – and Hoo Marina/Vicarage Road – business uses only. No evidence is presented for varying the Local Plan approach and therefore Policy HOO3 needs to be amended.

Where the revised suggestion for Policy HOO3 refers to "industrial and distribution development in other locations" this is far less specific as to suitable locations than the related Local Plan Policies ED 1-3 and does not add anything of consequence to what they already require. That element of the Policy therefore needs to be omitted.

The "Interpretation" section suggests that a primary concern is for improving the detail of the development of distribution sites, as provided for in the third element of the Policy.

Recommendation 5:

Amend Policy HOO3: Industry and Distribution as follows:

'1. In addition to strategic sites allocated by the Local Plan, at the following industrial estates (as shown on Map 4) industrial and/or distribution developments will be supported in accordance with Local Plan Policy requirements:

- a. *Kingsnorth Employment Area;*
- b. *Hoo Marina Industrial Estate.*

2. Development for distribution uses must include adequate supporting facilities, including lorry parking and toilets for drivers.'

As amended Policy HOO3 meets the Basic Conditions.

5: Housing

The editing of the Rationale section appears to have gone awry, with references in the second paragraph under "Local Policy" referring to a non-existent "this figure" and a reference to draft Policy S4 not being distinguished from current Local Plan Policies. Also, the sentence "Policy S14 is contentious due to environmental impacts, so it is unclear whether this will survive to adoption" has itself proved to be contentious. Since the Neighbourhood Plan does not seek to interfere with the strategic housing allocations the sentence quoted would certainly be best omitted. As is even more evident now, references to National Policy are likely to date quickly. Some redrafting is therefore required.

HOO4: Housing Growth and Mix

This Policy aims to support the provision of further housing, which accords with the expectations of the NPPF section 5 “Delivering a sufficient supply of homes”. In relation to the Policy wording, I noted the following:

- i) It is helpful that the expectation of land allocations from the Local Plan is made clear.
- ii) It is unclear why the conversion of agricultural buildings – already encouraged at a national level where buildings are redundant – could lead to any “significant loss of the best and most versatile agricultural land”. The Qualifying Body sought to explain that the requirement for agricultural buildings was intended to make clear that the policy would not enable residential development of agricultural land associated with the buildings. The current Policy wording is not clear.
- iii) A representation has suggested the addition of “d. on other greenfield and brownfield sites which are or can be made sustainable”. However, it would not be possible for the Neighbourhood Plan to adopt such an open position since it is not explained what might make unidentified sites assuredly “sustainable”.

Recommendation 6:

6.1 Under the heading “5: Housing”, sub-heading “Local Plan”:

6.1.1 Delete the second paragraph.

6.1.2 Delete from the third paragraph:

“S14 deals with Chattenden Barracks and recognises the long-term development potential of the site for business, educational or residential uses.

Policy S14 is contentious due to environmental impacts, so it is unclear whether this will survive to adoption.”

6.1.3 Move the last paragraph to become a new fourth paragraph and delete its second sentence. Add to this paragraph:

‘The housing requirements to be met within the Neighbourhood Area were not resolved at the time of the preparation of this Plan but it is evident that the scale of the requirement is likely to be significant since there is presently (2023) a shortfall with the required 5 year land supply in the District. In the absence of a 5 year supply the planning balance is tipped in favour of developments that can be shown to be sustainable but which may not have been identified in the adopted Local Plan.’

6.2 Within Policy HOO4 amend element 1(c) to replace “providing there is no significant loss of the best and most versatile agricultural land” with ‘as provided for within the NPPF’.

As amended Policy HOO4 meets the Basic Conditions.

HOO5: Housing Standards

This Policy aims to support the provision of good quality housing, which accords with the expectations of the NPPF section 12 “Achieving well-designed and beautiful places”. I raised the following queries with the Qualifying Body:

1. A representation queries the need to specify an “electric charging point” for bicycles since this would be a domestic socket. As this level of detail is not addressed within the land use planning system, this requirement is not appropriate.
2. Given the caveat in the supporting text, it would seem appropriate to use ‘should’ rather than “must” in element 4 regarding amenity space. The Qualifying Body agreed.

3. The local planning authority suggested a rewrite of element 5 as follows: “New housing schemes should include on site open space facilities within easy walking distance to address the needs of new residents such as play, allotments, outdoor sports. These should follow the recommended NPPF and Fields in Trust guidance.” The Qualifying Body did not feel that the expanded wording was helpful but did agree that reference to the Fields in Trust guidance could be added into the Interpretation. The use of the term “very” close proximity is difficult to interpret without a site context and so should be omitted.

Recommendation 7:

7.1 Within Policy HOO5:

7.1.1 In element 3 replace “with electric charging points” with ‘including electric cycles’.

7.1.2 In element 4 replace “must” with ‘should’ and replace sub-element (c) with ‘Surrounding or adjacent public open space’.

7.2 In the related “Interpretation” section delete the last paragraph/sentence (which doesn’t relate to the Policy content) with: ‘The Fields in Trust “[Guidance for Outdoor Sport and Play](#)” is helpful to providing appropriately for new housing developments.’

As amended Policy HOO5 meets the Basic Conditions.

6. PLACE AND HERITAGE

HOO6: Design

This Policy aims to support the provision of good quality housing, which accords with the expectations of the NPPF section 12 “Achieving well-designed and beautiful places”. I note that it is said that “The Neighbourhood Plan sets more specific design requirements” (page 39) but it is not clear that this is the case. In contrast, it would appear from representations that developers are resistant to even modest degrees of local influence. But the NPPF (para 132) is absolutely clear that community influence is vital: “Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.” This expectation supports my view that Policy HOO6 probably doesn’t go far enough in identifying local characteristics. I cannot see that the different wordings proposed within representations are any improvement on the Plan wordings, but it would be appropriate for the words ‘demonstrably’ to be added to Policy elements 2(a) & 2(b) which then establishes the need for a dialogue within the design process based on evidence rather than mere assertion. The Qualifying Body agreed with this revision.

It is unclear why it is felt necessary to state: “Building materials must have a high standard of finish and be durable to weathering”. The Qualifying Body commented that the requirement for building materials to have a high standard of finish and be durable reflects the National Design Guide (Paragraphs 30 and 57 refer to materials being practical, durable, affordable and attractive). However, if the content is in the National Guidance it doesn’t benefit from being repeated unless local detail is being added.

I note that the local planning authority and other representations have commented:

- i) In element 4 add “water re-use” as a positive design feature; the Qualifying Body agreed.
- ii) In element 6 replace “Hard surface ground materials” with ‘hard landscape materials’ and in the supporting text provide examples. The Qualifying Body responded: “The suggested amendment to wording could be interpreted to exclude other external surfaces, such as

driveways. This would reduce the effectiveness of the policy". But I don't accept that is the case; apart from the suggestion being a more common phrase, it does more readily emphasise the integration of hard and soft landscaping.

iii) Does element 7 has the clarity required to achieve good design? The Qualifying Body explained: "Clause 7 is an enabling statement, to make clear that the NP supports and does not seek to suppress creative and green design". I accept that this accords with NPPF content (para 139).

iv) Amend element 8 to: 'A variety of Sustainable Drainage Systems (SuDS) should be sensitively designed to form an integral part of new open spaces and green infrastructure, wherever possible'. The Qualifying Body agreed.

v) Other guidance could be added to that for Water Infrastructure. The Qualifying Body explained that the guidance on water infrastructure reflects comments made by Southern Water at the Regulation 14 stage" and added, fairly, that the AECOM document is fully referenced.

Whilst some representations appear to have assumed that the Design Codes document produced by AECOM is part of the Policy, this is not explicitly stated. A representation also notes that some of the contextual information in the Code document is now dated – inferring that this may compromise its value. The Qualifying Body has explained: "There is no policy requirement to comply with the AECOM document, as it would be incapable of being implemented and would not meet the requirements in NPPF Paragraph 16. The document is written as evidence and analysis, with some guidance, rather than [as] policy. However, key principles from the document are reflected in various policies, not just in HOO6." I confirm that, although misleadingly titled perhaps, the Code does not form part of the Plan policy content.

Recommendation 8:

Within Policy HOO6:

8.1 In element 2 replace "must" with 'proposals must demonstrate that their design'.

8.2 In element 3 replace the opening words with: 'New-build development proposals for new layout and public realm must demonstrate the achievement of' and then omit "provide" and "include" from the (a), (b), (c) sub-elements.

8.3 In element 4 add "water re-use" as a positive design feature.

8.4 In element 5 omit "and be durable to weathering".

8.5 In element 6 replace "Hard surface ground materials" with 'Hard landscaping materials'.

8.6 Amend element 8 to: 'A variety of Sustainable Drainage Systems (SuDS) should be sensitively designed to form an integral part of new open spaces and green infrastructure, wherever possible'.

As amended Policy HOO6 meets the Basic Conditions.

HOO7: Local Heritage

This Policy aims to support the protection of heritage assets, which accords with the expectations of the NPPF section 16 "Conserving and enhancing the historic environment". As representations have pointed out, the wording of this Policy cannot go further than national Policy provides for eg "no harm" goes too far. The Qualifying Body has suggested revised wording which is the basis of my Recommendation. Whilst I have no query with the properties listed, in identifying the non-designated heritage assets there needs to be detail sufficient to justify their inclusion, and to provide an understanding of what is being

protected; it is unlikely that “surrounding fields” would be justified as the setting for “Windmill” without very specific justification. It would also be appropriate for their location to be identified on a map (or at the very least for their map reference to be provided).

Recommendation 9:

9.1 Amend Policy HOO7 as follows:

‘1. Development should take opportunities to enhance and avoid significant harm to the character and significance of Hoo’s industrial, military and war heritage, including the Hoo Stop Line and its historic structures, features and landscape (the extent of which is illustrated on Map 6).

2. Development should take opportunities to enhance and avoid significant harm to non-designated heritage assets including the following (as shown on Map 7) and their settings:

The Five Bells public house;

Library, Church Street, Hoo;

Yew Tree Lodge Residential Care Home, Stoke Road, Hoo;

Former National School Building, Church Street, Hoo;

Old bomb disposal buildings at Lodge Hill;

Hoo Institute, Main Road;

Windmill former Pub (health centre), Ratcliffe Highway;

Millers Cottage, Ratcliffe Highway.

3. The refurbishment and sensitive and proportionate extension of historic farmsteads will be supported where the scheme preserves or enhances their character and significance.’

9.2 In the related “Interpretation” section:

9.2.1 Provide source details for Maps 5 & 6.

9.2.2 For the “Buildings of local interest (non-designated)” provide further and consistent details about the heritage significance of these buildings.

9.2.3 Add a Map 7 locating the “Buildings of local interest (non-designated)” or, at the very least, provide the map references as has been done for listed buildings; if providing a map alter subsequent map numbering accordingly.

As amended Policy HOO7 meets the Basic Conditions.

7. LANDSCAPE AND NATURAL ENVIRONMENT

The local planning authority has noted that the supporting text includes: “Chattenden Valley is an important green corridor between Hoo St Werburgh and Chattenden. It forms a corridor for wildlife and maintains the distinctive identify of the two settlements.” It was suggested to the Qualifying Body that a map locating the valley – perhaps with indicative boundary edges – would be helpful to the understanding of this reference. The suggestion of a map showing was welcomed by the Qualifying Body and a map has been provided. Given that there is no definitive boundary for the Valley I believe that the map needs to show a broken boundary line – to make clear that it’s an indicative rather than a hard edge.

The local authority has also noted that “no reference is made to the Medway Landscape Character Assessment (either current or updated), including relevant character area qualities and guidelines”. The Qualifying Body responded that a reference was omitted in error and should have been included in the rationale to the Policy (‘Other Documents’).

The local authority has also noted other subject matter that this policy area might cover – but I must respond that Neighbourhood Plans are not required to address the full range of planning subjects and may quite properly rely on existing policies in many topic areas.

HOO8: Landscape and Environment

This Policy aims to support the protection of the natural environment, which accords with the expectations of the NPPF section 15 “Conserving and enhancing the natural environment”. Element 1 of this policy says that development should “avoid causing significant harm” whereas element 3 says that “no harm” should be caused to woodland and water features. Whilst it is reasonable for the Neighbourhood Plan to note the existence of areas of special protection, it is for the relevant designation to define the basis for protection. The Qualifying Body has responded that “the term ‘significant harm’ is more commonly used in landscape policies, and this could be used throughout the policy for consistency and compliance with national policy”. The local planning authority has queried the threshold for “significant harm”, but I would add that the planning system would expect that this be assessed in context. A representation has suggested that the minimum biodiversity net gain should be defined but this is already stated in national planning policy, and this may change over time.

A representation suggests in relation to Element 3 that “This needs to be amended, but we consider [it] should be deleted to avoid unnecessary repetition of the protections afforded by the NPPF”. However, the Plan mapping has identified the features listed and so, whilst the Policy cannot say “no harm”, it can say that ‘Development proposals must demonstrate appropriate regard for the local landscape features as illustrated on Map x’.

For element 4 the local planning authority would prefer that the wording insist that buffer zones are required. The Qualifying Body agreed.

Element 5 of the Policy would need to be caveated with ‘wherever feasible’. The Qualifying Body agreed that Clause 5 should be amended as suggested, but added that tree replacement should be provided, where loss is unavoidable.

The local planning authority has suggested that the element 6 term “landscape transition zone” is not self-explanatory; I would add that the supporting text seems to suggest it is about disguising new development whereas avoiding a “hard” edge might be more about blending rural- and village-scape. The Qualifying Body confirmed that the intention is to avoid hard edges to the rural edge, for example through use of landscaping, hedges, etc. and the interpretation could be augmented for clarity.

Element 7 again uses the term “no harm” which is an expectation even beyond Green Belt protection. Alternative wording was accepted by the Qualifying Body: ‘The open character of the landscape separation between Hoo and Chattenden is of significant local value and this characteristic should be retained.’ The local planning authority has suggested that greater certainty would be provided by indicating a specific area of separation on a map, but the opportunity for adding new Policy content has now passed.

I queried whether element 9 adds anything that has not already been stated; the Qualifying Body agreed that it did not.

Whilst it may be reasonable for element 10 to address allotments, a general protection for all orchards and an undefined category of ‘land for local food production’ cannot be justified without significantly more evidence than has been provided as to its impact in the locality. The support for new local food production facilities should be ‘in principle’ since the detail of some such developments in the countryside could be problematic.

Element 11 addresses a strategic planning matter in terms which go beyond the expectations of the NPPF and cannot be retained. The Qualifying Body suggested that the wording could be amended to reflect NPPF paragraph 180 more closely, but there would still be no local detail present.

As will be noted later, the Qualifying Body has suggested that content inappropriately included in Policy HOO9 should be transferred to Policy HOO8 – this could be a replacement for paragraph 11.

The local planning authority has noted that on Map 7 the Ancient Woodland is not easily legible and the Qualifying Body agreed that a replacement should be used.

Recommendation 10:

10.1 Under the heading “7. Landscape and Natural Environment”:

10.1.1 Under the sub-heading “Planning Background”:

10.1.1.1 In the second paragraph reference Map 7 and in the sixth paragraph reference Map 8 (renumbered as Map 9, see below); move both maps to before the Policy.

10.1.1.2 After “Chattenden Valley is an important green corridor between Hoo St Werburgh and Chattenden” insert ‘(see Map 8)’; insert before Policy HOO8 the map illustrating the extent of the valley sent with the responses to the Examiner’s Initial Enquiries on 24th June 2024 but amend the indicative boundary to a broken rather than a solid line; renumber subsequent maps accordingly.

10.1.2 Under the sub-heading “Other Documents” add a reference to the latest version of the Medway Landscape Character Assessment (including a source reference as per the earlier Recommendation).

10.2 Within Policy HOO8:

10.2.1 In element 1 delete “take opportunities to”.

10.2.2 In element 3 replace “take opportunities to enhance and should not harm” with ‘enhance and avoid causing significant harm to’.

10.2.3 In element 4 replace “should include” with ‘will require’.

10.2.4 Replace element 5 with: ‘Wherever feasible trees and other natural features of value should be retained and be incorporated into the design and layout of development. Tree replacement should be provided where loss is unavoidable.’

10.2.5 In element 6 replace “off” with ‘of’.

10.2.6 Replace element 7 with: ‘The open character of the landscape separation between Hoo and Chattenden is of significant local value and this characteristic should be retained. The impact of development in this vicinity must be examined and mitigated with a Landscape and Visual Impact Assessment.’

10.2.7 Delete element 9.

10.2.8 Replace element 10 with: ‘Development should avoid causing significant harm to allotments and new facilities for local food growing will be supported in principle.’

10.2.9 Delete element 11 and replace with: ‘Development should have no significant adverse impact on, and take opportunities to enhance, the open and green character, amenity, safety, accessibility, and community value of green spaces and green infrastructure’.

10.3 Replace Map 7 with a version with greater clarity.

As amended Policy HOO8 meets the Basic Conditions.

HOO9: Local Green Space

This Policy aims to support the protection of the local green spaces, which accords with the expectations of the NPPF section 8 “Promoting healthy and safe communities”. The Policy is supported by evidence with a separately submitted document: “Hoo St Werburgh and Chattenden Local Green Space Assessment July 2022”. This document considers how the two proposed Local Green Spaces meet the criteria set out in the NPPF (paras 105 – 107). During my visit to the Neighbourhood Area I looked at these spaces in the light of the evidence document and it is reasonable for me to conclude that the two spaces should be designated because of their special and particular value to the local community.

The local planning authority commented: “Preference would be for the paddock at the southern end of Elm Avenue to come under Hoo Common ownership and long-term management.” Ownership is not a matter of specific concern when designating Local Green Spaces and any extension to the boundary of the areas proposed for designation at this stage could require a re-run of the public consultations.

The NPPF says (para 107) that “Policies for managing development within a Local Green Space should be consistent with those for Green Belts”; it would seem that element 2 of the Policy goes beyond the scope of Green Belt policy. The Qualifying Body agreed that “clause 2 of the Policy is problematic when applied specifically to Local Green Space, but does reflect national policy and guidance when applied to impacts on green spaces and infrastructure in general. The LPA has suggested some rewording. A solution may be to move the clause to the design policy (HOO6), whilst also replacing the words ‘Local Green Space’ with ‘green spaces and green infrastructure’? This would remove the conflict with LGS policy, whilst also responding to national policy and guidance on design and green infrastructure.” My recommendations follow this approach.

Recommendation 11:

Within Policy HOO9: Local Green Space

11.1 Amend clause 1 as follows:

‘The following spaces are designated as Local Green Space:

LGS1: Village Green, Church Street (Map 10)

LGS2: Hoo Common, Elm Avenue (Map 11).’

11.2 Replace clause 2 with “The management of development within these spaces will be consistent with national policies for the Green Belt.”

As amended Policy HOO9 meets the Basic Conditions.

HOO10: Air Quality

This Policy aims to support the protection of air quality, which accords with the expectations of the NPPF section 15 “Conserving and enhancing the natural environment”. The Air Quality Management Area (AQMA) within the Neighbourhood Area has been designated locally rather than nationally and I commented to the Qualifying Body that I could not see that Policy HOO10 adds anything supported by evidence to the local planning authority’s

existing planning requirements. The Qualifying Body responded: “The Air Quality policy was included in response to the community’s views. It complements the LPA’s requirements and highlights the specific issues relating to the Parish. If necessary, rewording would be preferable to deletion”. My view is that the only local detail is Map 11, which simply acknowledges the designation made by others. The NPPF (para 16f) states that policies should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area”. But I note that a purpose here is to highlight an issue identified through community consultation.

Recommendation 12:

Within Policy HOO 10 add to element 1 ‘, in particular the area illustrated on Map 12.’

As amended Policy HOO10 meets the Basic Conditions.

8. TRAVEL INFRASTRUCTURE

HOO11: Sustainable Transport and Active Travel

This Policy aims to support sustainable travel, which accords with the expectations of the NPPF section 9 “Promoting sustainable transport”. The local planning authority has commented: “The policy generally does not appear to prioritise active travel and public transport movements over private car use”, which perhaps begs the question whether anything of significance is being added to existing policy requirements (national and local). The Qualifying Body agreed that a rewording of this element of the Policy would be appropriate.

As noted earlier, a representation queries the need to specify an “electric charging point” for bicycles since this would be no more than a standard socket. As I noted earlier, as this level of detail is not addressed within the land use planning system, this requirement is not appropriate.

It is further questionable as to whether element 3 adds anything of significance to the more balanced element 1. A representation has suggested this alternative:

“3. Development must be supported by adequate road infrastructure and/or [a] financial contribution where necessary to mitigate the impact of development and to safely support additional traffic movements where it is evidenced there would be an unacceptable highway safety impact, and/or the impact [on] the transport network would be severe.” The Qualifying Body noted that “appears to repeat national policy” and overall I conclude that element 1 is sufficient, without the need for element 3.

In relation to element 6, the local planning authority has commented: “New roads already have to ensure that they can accommodate service and emergency vehicles – this policy does not appear to offer much more apart from requiring ‘easy passage’, which has the potential to encourage building of wider roads than necessary, which will encourage speeding and thus potentially lead to more serious traffic incidents”. This again raises the question as to whether a Neighbourhood Plan can add anything to current planning policies on transport other than through site-specific proposals, of which there are none in the present Plan. The Qualifying Body commented: “Clause 6 was included due to actual problems that have been experienced in the area” but I am not presented with any evidence appropriate to varying district-wide standards.

Recommendation 13:

13.1 Within Policy HOO11: Sustainable Transport and Active Travel:

13.1.1 Replace element 1 as follows:

'Travel proposals for large developments should include layouts that prioritise safe, active travel and sustainable forms of transport movement over private car use, appropriately to the scale and nature of the scheme.'

13.1.2 From element 2 delete: “, with electric charging points”.

13.1.3 Delete element 3.

13.1.4 Delete element 6.

13.2 At the beginning of the related “Interpretation” section add ‘large’ between “For” and “new”.

As amended Policy HOO11 meets the Basic Conditions.

HOO12: Paths

This Policy aims to support active travel, which accords with the expectations of the NPPF section 9 “Promoting sustainable transport”. The local planning authority has indicated that references to the “National Coastal Footpath” should be amended to the ‘King Charles III England Coast Path’. They have also noted a few typographical errors. The Qualifying Body agreed that these matters would be corrected.

Given the density of protected footpaths etc. within the Neighbourhood Area it is improbable that development will not affect the “amenity” (however that might be defined) of the routes, and that is not a protected characteristic for public rights of way. There is a scheme for rights of way to be diverted and the Neighbourhood Plan can’t afford more protections than national legislation allows. The Qualifying Body agreed that amendments to the Policy wording are needed.

It is not immediately apparent, nor explained, what the Policy reference to “development of the sea wall” might entail. The Qualifying Body explained that the development of the sea wall would involve the reconstruction or upgrading of flood defences, and could include improved footpath provision.

Recommendation 14:

Within Policy HOO12: Paths:

14.1 Replace element 1 with:

‘Development should not have any significant adverse impact on the safety or accessibility of public rights of way, the national cycle route, or bridleways, including the Saxon Shore Way (as illustrated on Map 13).’

14.2 Amend the Map on page 69 to incorporate the Map reference number, a title to match the Policy (Public Rights of Way, the National Cycle Route, and Bridleways, including the Saxon Shore Way), and extend the content and key to include the National Cycle Route and Bridleways, including the Saxon Shore Way.

14.3 Replace element 3 with:

‘Reinforcement of the sea wall incorporating a public footpath will be supported from Kingsnorth to Chattenden, encompassing Cockham Fort and any future parkland, to join up with the King Charles III England Coast Path’.

As amended Policy HOO12 meets the Basic Conditions.

9. INFRASTRUCTURE

9.1 Planning Infrastructure Priorities

National Planning Policy Guidance confirms that Neighbourhood Plans may contain “policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy” (Paragraph: 005 Reference ID: 41-005-20190509). I note that the Plan statement here gives an indication of priority rather than a policy as such. The local planning authority has commented: “New major developments should also be providing new outdoor sport facilities (such as football and tennis) on-site so they are more accessible, rather than just all facilities focused at Deangate”; as the local authority also notes, that appears to be part of the purpose of Policy H005. The Qualifying Body agreed that ‘Improvement of local community, recreation and sports facilities’ could be added to the text on infrastructure priorities.

Recommendation 15:

Under the sub-heading “9.1 Planning Infrastructure Priorities” add to the beginning of the listing: ‘Improvement of accessibility to local community, recreation and sports facilities’.

10. Contact and Acknowledgements

No comment.

European Union (EU) and European Convention on Human Rights (ECHR) Obligations

A further Basic Condition, which the Hoo St Werburgh and Chattenden Neighbourhood Plan must meet, is compatibility with the retained European Union (EU) and European Convention on Human Rights (ECHR) obligations.

Regulation 9 of the Strategic Environmental Assessment (SEA) Regulations requires that the responsible authority (Medway Council) shall determine whether or not a plan is likely to have significant environmental effects. Medway Council concluded in their Draft Strategic Environment Assessment and Habitats Regulations Assessment Screening Report (April 2023) that “The Hoo St Werburgh and Chattenden NP is not likely to have a significant effect on the environment.”. As is appropriate, this screening decision was sent to Natural England, the Environment Agency and Historic England, who agreed (or did not disagree) with the decision that an SEA was not required for this Neighbourhood Plan.

Medway Council’s Habitats Regulations Assessment (HRA) Screening of April 2023 concluded, in relation to the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Conservation of Habitats and Species Regulations 2010 (as amended), that “The Hoo St Werburgh and Chattenden Neighbourhood Plan allocates no specific sites for residential development (though it includes some policies by which development would be appraised). While Hoo St Werburgh and Chattenden Parish contains areas designated as [of] international importance (SPA and Ramsar site), on balance, there is sufficient evidence to suggest that the Hoo St Werburgh and Chattenden Neighbourhood Plan is not likely to cause a significant effect on any European site, including cumulatively, in combination with other plans or proposals, and will not require a full appropriate assessment for future development under Article 6 or 7 of the Habitats Directive (Art. 3.2(b)).”

With regard to the European Convention on Human Rights, the Basic Conditions Statement (September 2023) that accompanies the Neighbourhood Plan notes:

“The Neighbourhood Plan provides a range of policies which will result in positive benefits for the local community, including those with protected characteristics.”

No evidence has arisen or been put forward to demonstrate that the Qualifying Body has not been mindful of the fundamental rights and freedoms guaranteed under the European Convention on Human Rights in the process of preparing the Neighbourhood Plan.

Taking all of the above into account, I am satisfied that the Hoo St Werburgh and Chattenden Neighbourhood Plan, as now modified is compatible with the retained EU obligations and that it does not breach, nor is in any way incompatible with, the ECHR.

Conclusions

This Independent Examiner's Report recommends a range of modifications to the Policies, as well as some of the supporting content, in the Plan. Modifications have been recommended to effect corrections, to ensure clarity and in order to ensure that the Basic Conditions are met. Whilst I have proposed a significant number of modifications, the Plan itself remains fundamentally unchanged in the role and direction set for it by the Qualifying Body.

I therefore conclude that, subject to the modifications recommended, the Hoo St Werburgh and Chattenden Neighbourhood Plan:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the Plan for the area;
- is compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations;
- does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(d).

On that basis I *recommend* to Medway Council that, subject to the incorporation of modifications set out as recommendations in this report, it is appropriate for the Hoo St Werburgh and Chattenden Neighbourhood Plan to proceed to referendum.

Referendum Area

As noted earlier, part of my Examiner role is to consider whether the referendum area should be extended beyond the Plan area. I consider the Neighbourhood Area to be appropriate and no evidence has been submitted to suggest that this is not the case. I therefore ***recommend*** that the Plan should proceed to referendum based on the Neighbourhood Area as approved by Medway Council on 18th December 2018.

Recommendations: (this is a listing of the recommendations exactly as they are included in the Report)

Rec	Text	Reason
1	<p>1.1 Amend the front cover to show a Plan period of '2023 – 2040'; references to "Regulation 15 Version V4.8" can now be removed.</p> <p>1.2 Amend the Plan format to include consistent sub-paragraph numbering and consistent map referencing as appropriate within the text. Either through footnotes or other appropriate means, ensure that documents mentioned within the text are fully source referenced.</p> <p>1.3 Under the heading "1.1 Purpose of the Neighbourhood Plan" replace the third paragraph with: 'The Hoo Neighbourhood Plan has been prepared in advance of the new Medway Local Plan which will include a positive strategy for growth for the local authority area. This Plan does not make development site allocations, since these will be forthcoming within the Local Plan, but it does make provision for growth in its policies, including support for employment, residential and community facilities. At the same time, there are policies on design, the environment and transport which can help to ensure that local development is sustainable, environmentally, socially, and economically.'</p> <p>1.4 Under the heading "1.2 Status of the Neighbourhood Plan" replace "The Neighbourhood Plan will be in force until the end of 2040" with 'The Plan is intended to cover the period until 2040, but it is likely that the Plan will need a review during that period'.</p> <p>1.5 For Map1 amend the title and add a key to say 'Neighbourhood Area' (rather than "Neighbourhood Plan Area").</p>	For clarity and accuracy
2	<p>2.1 Under the heading "2.1 The Area – Key Characteristics" replace "Expansion of the population has not been matched by the necessary expansion or improvement of transport and community infrastructure, including health and educational provision" with 'Feedback from community engagement has suggested that expansion of the population has yet to be matched by an equivalent expansion or improvement of transport and community infrastructure, including health and educational provision.'</p> <p>2.2 Under the heading "2.3 Liaison with Medway Council" replace "Medway's Local Housing Needs Assessment identifies a need for 1667 homes a year (March 2023). However, national Government is considering housing figures again, so this figure is likely to change" with 'The emerging Medway Local Plan proposes strategic housing site allocations, including several sites within the Parish. The Neighbourhood Plan does not allocate sites, but does accommodate growth in various ways. Development proposals for the sites allocated in the Local Plan, once adopted, will need to address the policies in this Neighbourhood Plan, for example relating to design and infrastructure'.</p>	For clarity and accuracy

3	<p>3.1 Replace Policy HOO1 with the following: ‘Employment Development 1. Employment development is supported in principle and appropriately according to location through: a. redevelopment of brownfield sites within or adjacent to the built settlements; b. redevelopment or improvement of existing employment sites.</p> <p>2. Support for employment development is subject to the site having adequate and safe access to a highway with sufficient capacity and there being no significant adverse impact on: a. the viability of other employment sites; b. the amenities of residential properties by reason of visual intrusion, noise, dust, disturbance, vibration, vehicle movements or other impacts; c. the historic environment; d. the rural character, landscape and natural environment.’</p> <p>3.2 Within the related “Interpretation” delete paragraphs 4 & 5.</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3
4	<p>4.1 Number the Map on page 26 ‘Map 3’ and add the source as ‘Medway Local Plan 2003 Policies Map’. Reference Map 3 within the Policy.</p> <p>4.2 Number the Map on page 27 as ‘Map 2’ and retitle it as ‘Local Facilities within the Walkable Neighbourhoods of Hoo and Chattenden’. Move the map to the end of the “Rationale” section, before the Policy.</p> <p>4.3 Add a new paragraph within the “Rationale” section along these lines: ‘Education Service Officers have confirmed that there is pressure on school places in the Hoo and Chattenden area, and demand is forecast to outstrip the places available in local schools. Medway Council, as the Local Education Authority, is working with local schools to explore options for expansions of existing schools. This continues on from expansions in recent years. Longer term new schools may be needed. Medway Council has recognised that the service base in the rural area of the Hoo Peninsula is limited, and residents often have to travel to neighbouring towns to access services.’</p> <p>4.4 Amend Policy HOO2 as follows: ‘1. New community facilities, including health, recreation and education facilities, will be supported in the existing built settlements (as illustrated by Map 3) or in other sustainable and accessible locations within walking distance of the residential areas to be served, subject to meeting the further requirements of this Policy.</p> <p>2. There is support in principle for new community facility development, and improvement and diversification of existing facilities, subject to the following criteria: a. A need has been established; b. The site has access to a highway with sufficient capacity; c. There are good pedestrian and cycle linkages;</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3

	<p>d. The type and scale of the new or expanded community facilities complements any existing provision of similar facilities nearby; and</p> <p>e. It has been established that there would be no significant adverse impact on:</p> <ul style="list-style-type: none"> i. the amenities of residential properties by reason of visual intrusion, noise, dust, disturbance, vibration, vehicle movements or other impacts ; ii. the historic environment (meeting the requirements of HOO7); iii. the rural character, landscape and natural environment (meeting the requirements of Policy HOO8). <p>3. Loss of existing community facilities will be supported only where:</p> <ul style="list-style-type: none"> a. It has been established that there is no need to be met; b. A similar or better facility is being provided which meets the requirements of this Policy; or c. It has been demonstrated with evidence that the facility is no longer viable.' <p>4.5 Within the related "Interpretation":</p> <p>4.5.1 Within the first paragraph add 'and education' between "health" and "facilities".</p> <p>4.5.2 Delete the second sentence of the last paragraph.</p> 	
5	<p>Amend Policy HOO3: Industry and Distribution as follows:</p> <p>'1. In addition to strategic sites allocated by the Local Plan, at the following industrial estates (as shown on Map 4) industrial and/or distribution developments will be supported in accordance with Local Plan Policy requirements:</p> <ul style="list-style-type: none"> a. Kingsnorth Employment Area; b. Hoo Marina Industrial Estate. <p>2. Development for distribution uses must include adequate supporting facilities, including lorry parking and toilets for drivers.'</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3
6	<p>6.1 Under the heading "5: Housing", sub-heading "Local Plan":</p> <p>6.1.1 Delete the second paragraph.</p> <p>6.1.2 Delete from the third paragraph: "S14 deals with Chattenden Barracks and recognises the long-term development potential of the site for business, educational or residential uses.</p> <p>Policy S14 is contentious due to environmental impacts, so it is unclear whether this will survive to adoption."</p> <p>6.1.3 Move the last paragraph to become a new fourth paragraph and delete its second sentence. Add to this paragraph:</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3

	<p>'The housing requirements to be met within the Neighbourhood Area were not resolved at the time of the preparation of this Plan but it is evident that the scale of the requirement is likely to be significant since there is presently (2023) a shortfall with the required 5 year land supply in the District. In the absence of a 5 year supply the planning balance is tipped in favour of developments that can be shown to be sustainable but which may not have been identified in the adopted Local Plan.'</p> <p>6.2 Within Policy HOO4 amend element 1(c) to replace "providing there is no significant loss of the best and most versatile agricultural land" with 'as provided for within the NPPF'.</p>	
7	<p>7.1 Within Policy HOO5:</p> <p>7.1.1 In element 3 replace "with electric charging points" with 'including electric cycles'.</p> <p>7.1.2 In element 4 replace "must" with 'should' and replace sub-element (c) with 'Surrounding or adjacent public open space'.</p> <p>7.2 In the related "Interpretation" section delete the last paragraph/sentence (which doesn't relate to the Policy content) with: 'The Fields in Trust "Guidance for Outdoor Sport and Play" is helpful to providing appropriately for new housing developments.'</p>	For clarity and accuracy and to meet Basic Condition 1
8	<p>Within Policy HOO6:</p> <p>8.1 In element 2 replace "must" with 'proposals must demonstrate that their design'.</p> <p>8.2 In element 3 replace the opening words with: 'New-build development proposals for new layout and public realm must demonstrate the achievement of' and then omit "provide" and "include" from the (a), (b), (c) sub-elements.</p> <p>8.3 In element 4 add "water re-use" as a positive design feature.</p> <p>8.4 In element 5 omit "and be durable to weathering".</p> <p>8.5 In element 6 replace "Hard surface ground materials" with 'Hard landscaping materials'.</p> <p>8.6 Amend element 8 to: 'A variety of Sustainable Drainage Systems (SuDS) should be sensitively designed to form an integral part of new open spaces and green infrastructure, wherever possible'.</p>	For clarity and accuracy and to meet Basic Condition 1
9	<p>9.1 Amend Policy HOO7 as follows:</p> <p>'1. Development should take opportunities to enhance and avoid significant harm to the character and significance of Hoo's industrial, military and war heritage, including the Hoo Stop Line and its historic structures, features and landscape (the extent of which is illustrated on Map 6).</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3

	<p>2. Development should take opportunities to enhance and avoid significant harm to non-designated heritage assets including the following (as shown on Map 7) and their settings: The Five Bells public house; Library, Church Street, Hoo; Yew Tree Lodge Residential Care Home, Stoke Road, Hoo; Former National School Building, Church Street, Hoo; Old bomb disposal buildings at Lodge Hill; Hoo Institute, Main Road; Windmill former Pub (health centre), Ratcliffe Highway; Millers Cottage, Ratcliffe Highway.</p> <p>3. The refurbishment and sensitive and proportionate extension of historic farmsteads will be supported where the scheme preserves or enhances their character and significance.’</p> <p>9.2 In the related “Interpretation” section: 9.2.1 Provide source details for Maps 5 & 6.</p> <p>9.2.2 For the “Buildings of local interest (non-designated)” provide further and consistent details about the heritage significance of these buildings.</p> <p>9.2.3 Add a Map 7 locating the “Buildings of local interest (non-designated)” or, at the very least, provide the map references as has been done for listed buildings; if providing a map alter subsequent map numbering accordingly.</p>	
10	<p>10.1 Under the heading “7. Landscape and Natural Environment”: 10.1.1 Under the sub-heading “Planning Background”: 10.1.1.1 In the second paragraph reference Map 7 and in the sixth paragraph reference Map 8 (renumbered as Map 9, see below); move both maps to before the Policy.</p> <p>10.1.1.2 After “Chattenden Valley is an important green corridor between Hoo St Werburgh and Chattenden” insert ‘(see Map 8)’; insert before Policy HOO8 the map illustrating the extent of the valley sent with the responses to the Examiner’s Initial Enquiries on 24th June 2024 but amend the indicative boundary to a broken rather than a solid line; renumber subsequent maps accordingly.</p> <p>10.1.2 Under the sub-heading “Other Documents” add a reference to the latest version of the Medway Landscape Character Assessment (including a source reference as per the earlier Recommendation).</p> <p>10.2 Within Policy HOO8: 10.2.1 In element 1 delete “take opportunities to”.</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3

	<p>10.2.2 In element 3 replace “take opportunities to enhance and should not harm” with ‘enhance and avoid causing significant harm to’.</p> <p>10.2.3 In element 4 replace “should include” with ‘will require’.</p> <p>10.2.4 Replace element 5 with: ‘Wherever feasible trees and other natural features of value should be retained and be incorporated into the design and layout of development. Tree replacement should be provided where loss is unavoidable.’</p> <p>10.2.5 In element 6 replace “off” with ‘of’.</p> <p>10.2.6 Replace element 7 with: ‘The open character of the landscape separation between Hoo and Chattenden is of significant local value and this characteristic should be retained. The impact of development in this vicinity must be examined and mitigated with a Landscape and Visual Impact Assessment.’</p> <p>10.2.7 Delete element 9.</p> <p>10.2.8 Replace element 10 with: ‘Development should avoid causing significant harm to allotments and new facilities for local food growing will be supported in principle.’</p> <p>10.2.9 Delete element 11 and replace with: ‘Development should have no significant adverse impact on, and take opportunities to enhance, the open and green character, amenity, safety, accessibility, and community value of green spaces and green infrastructure’.</p> <p>10.3 Replace Map 7 with a version with greater clarity.</p>	
11	<p>Within Policy HOO9: Local Green Space</p> <p>11.1 Amend clause 1 as follows: ‘The following spaces are designated as Local Green Space: LGS1: Village Green, Church Street (Map 10) LGS2: Hoo Common, Elm Avenue (Map 11).’</p> <p>11.2 Replace clause 2 with “The management of development within these spaces will be consistent with national policies for the Green Belt.”</p>	For clarity and accuracy and to meet Basic Condition 1
12	<p>Within Policy HOO 10 add to element 1 ‘, in particular the area illustrated on Map 12.’</p>	For clarity and accuracy
13	<p>13.1 Within Policy HOO11: Sustainable Transport and Active Travel: 13.1.1 Replace element 1 as follows: ‘Travel proposals for large developments should include layouts that prioritise safe, active travel and sustainable forms of transport movement over private car use, appropriately to the scale and nature of the scheme.’</p>	For clarity and accuracy and to meet Basic Condition 1

	<p>13.1.2 From element 2 delete: “, with electric charging points”.</p> <p>13.1.3 Delete element 3.</p> <p>13.1.4 Delete element 6.</p> <p>13.2 At the beginning of the related “Interpretation” section add ‘large’ between “For” and “new”.</p>	
14	<p>Within Policy HOO12: Paths:</p> <p>14.1 Replace element 1 with: ‘Development should not have any significant adverse impact on the safety or accessibility of public rights of way, the national cycle route, or bridleways, including the Saxon Shore Way (as illustrated on Map 13).’</p> <p>14.2 Amend the Map on page 69 to incorporate the Map reference number, a title to match the Policy (Public Rights of Way, the National Cycle Route, and Bridleways, including the Saxon Shore Way), and extend the content and key to include the National Cycle Route and Bridleways, including the Saxon Shore Way.</p> <p>14.3 Replace element 3 with: ‘Reinforcement of the sea wall incorporating a public footpath will be supported from Kingsnorth to Chattenden, encompassing Cockham Fort and any future parkland, to join up with the King Charles III England Coast Path’.</p>	For clarity and accuracy and to meet Basic Condition 1
15	<p>Under the sub-heading “9.1 Planning Infrastructure Priorities” add to the beginning of the listing: ‘Improvement of accessibility to local community, recreation and sports facilities’.</p>	For clarity and accuracy