

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of *Athelhampton* on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name:

MR. B. BAKER

Address:

Date:

5.8.25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *Karen Saunders*

Address: _____

Date: *30/07/25*

ME3

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ALLHALDWS on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: CHRIS LOVAGE

Address: [REDACTED]

ME4 [REDACTED]

Date: 4/8/25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ~~ALLHALLONS~~ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: AILSA YOUNG. (FORMERLY RODGER)

Address:



Date: 2.8.2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *Ann Dackombe*

Address: _____

ME3 _____

Date: _____

03/08/2025



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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: MATTHEW HARRISON

Address: _____

Date: 04.08.25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ~~ALL HAILDS~~ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *MR. MRS J. LAMBOURNE*

Address: [REDACTED] ME3 [REDACTED]

Date: *3/08/25.*

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of *ALLHALLONS* on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards, *M. P. Kelly*

Name: *NORA KEILY*

Address: [REDACTED] *ME3* [REDACTED]

Date:

5th August 2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of *High Halstow* on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name:

John Colleer / Frances Colleer / Jarred Colleer

Address:

[Redacted Address]

Date:

2/ August / 2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of *High Halstow* the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *KATHRYN SMITH*

Address: [REDACTED] *7E3* [REDACTED]

Date: *04/08/25*

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: MR M.J. WIGGINS

Address: _____

ME3 _____

Date: 01.08.25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of [REDACTED] on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Jane Crozer [REDACTED] ME3 [REDACTED]

Address: [REDACTED]

Date: 10/8/25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of *HIGH HALSTON* on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24-28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15-36), and the treatment of Neighbourhood Plans (para 30-31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *PAUL RUSSELL*

Address:

ME3

Date: *05 - 08 - 2025*

04 AUG 2025



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

planning.representations@medway.gov.uk

Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable location) and maximise development allocations in the urban area (a more sustainable location). This is crucial in order to reduce impacts on the Hoo Peninsula's habitats and wildlife. Other comments:

Please turn over for further comments on the reverse.

Kind regards,

Name: DENISE C HEESMAU

Address: [REDACTED]

Date: [REDACTED]

30.7.2025.

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ~~HIGH HAUSTON~~ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: AMY OLIVER

Address: [REDACTED] ME3 [REDACTED]

Date: 8/8/25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: AHM69 RIFAT & ROSIE O'REILLY

Address: _____

1463

Date: 04/08/25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: MICHAEL & ANGELA FORWARD

Address: [REDACTED] ME3 [REDACTED]

Date: 4/8/2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: ZOE LOCKWOOD

Address: [REDACTED] ME3 [REDACTED]

Date: 3/8/2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ⁰ HIGH HALSTOW on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: ROBERT HUTCHINGS

Address:

[REDACTED] ME3 [REDACTED]

Date:

1-8-2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Mrs Pamela King

Address:

[Redacted Address]

Date: 4th August 2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of [redacted] on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Rachael Curtis

Address: [redacted]

Date: 1/8/25

ME3 [redacted]

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Jan DURRANT

Address:

Date:

4 Aug 2025.

ME3

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of HIGH HALSTON on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name:

I.P. CHEEK

Address:

[REDACTED]

ME3

[REDACTED]

Date:

1.8.25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Bird

Address: [REDACTED]

Date: 4.8.25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of *High Halstow* on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *Michael Wetherham*

Address:

[Redacted Address]

ME3

[Redacted Address]

Date:

21/8/2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ^{HIGH} ~~HALSTOW~~ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: **LAUREN WENHAM**

Address:

ME3

Date: **01/08/2025**

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ^{HIGH} ~~HALSTON~~ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: CAREN WENTHAM

Address: [REDACTED] ME3 [REDACTED]

Date: 4/8/25.

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Sandra McIlwraith & Anthony McIlwraith

Address:

Date:

2/8/25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24-28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15-36), and the treatment of Neighbourhood Plans (para 30-31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: SA & WB BRUNTI

Address:

Date:

4th August 2025.

ME3

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name:

MRS D. KEARTON

Address:

[REDACTED]

ME3

[REDACTED]

Date:

21/8/25

GARRY KEARTON

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name:

Julian Chopping

Address:

[Redacted Address]

ME3

[Redacted Postcode]

Date:

2/8/25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ~~HIGH HAISTON~~ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: ROGER BIRDSEY

Address:

[REDACTED]

ME3

[REDACTED]

Date: 1-8-25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ~~HIGH HALSTON~~ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: BEVERLEY BIRDSEY

Address: [REDACTED] ME3 [REDACTED]

Date: 1-8-25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Hutton on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: DEBORAH WILBY

Address:

ME3

Date: 8/8/25.

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *D. Russell*

Address: _____

Date: *3-8-25*

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: REBECCA HARVEY

Address:

Date: 6/8/2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of HIGH HALSTOW on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: DARRYL MAYES, ANDREA MAYES, TOBY MAYES

Address: [REDACTED] ME3 [REDACTED]

Date: 7/8/25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Mrs E J Clark

Address: [REDACTED]

Date: 3 - 8 - 2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ~~HIGH HALSELOW~~ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: S. MAXEY

Address:

[REDACTED] ME3 [REDACTED]

Date: 01-8-25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of H. CH. HANSTON on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: P. TAYLOR

Address: [REDACTED] ME3 [REDACTED]

Date: 1st August 2025

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

07/07/25

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: DALE CHEESEMAN

Address:

Date:

30.7.2025.

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24-28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15-36), and the treatment of Neighbourhood Plans (para 30-31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Caroline Harris and Marc Harris
Address: 

Date: 1/8/25

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of *High Halstow* on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *Rosemary Joyce*

Address: [REDACTED] ME3 [REDACTED]

Date: *1st August 2025*

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of **HIGH HALSTOW** on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: **LS JOYCE**

Address: [REDACTED] **ME3** [REDACTED]

Date: **1 Aug 2025**

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of *High Halstow* on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *Warren + Anna Dodds . Leah Dodds. Malcolm Borhoff*

Address: [REDACTED] *ME3* [REDACTED]

Date: *1.8.25*

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of _____ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: *MR & MRS RAYFIELD*

Address: _____

ME3

Date: *2-8-25*

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of **HIGH HALSTOW** on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: **DAVID WOOD**

Address:

[Redacted Address]

ME3

[Redacted Address]

Date:

1/8/2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of HIGH HALSTOW on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: GILLIAN WOOD

Address: [REDACTED] ME3 [REDACTED]

Date: 1/8/2025

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of High Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Z Naylor & S Coleman

Address: [REDACTED] ME3 [REDACTED]

Date: 01/08

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

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of Han Halstow on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: KATHLEEN WASHBROOK

Address: [REDACTED]

Date: 2/8/25