



**Medway Core Strategy additional comments on behalf of the
Church Commissioners for England (11)
25th May 2012**

**Wednesday 13th June
10am – Matter 3 - Housing Supply and Location**

Inspector's Questions

***a) Will the strategy deliver the number of new homes required to meet the RS requirements/
identified needs?***

The Church Commissioners have previously expressed support for the intention to deliver growth in accordance with the RSS housing growth figures and it remains correct, in policy terms, that the Council should be preparing their plan in accordance with regional guidance.

The Submission Document has reduced the total level of housing growth anticipated from 'Projected Strategic Land Availability Sites' (not including some of the large sites and allocations). It recognised that there may be evidence which demonstrates that these sites or the extent of development on them might not come forward at the levels which were previously anticipated. It is not clear however, on what basis this reduction has been undertaken and what the impact of it might be on the total delivery of growth in this area. It is considered that the Plan should not be pursuing a reduction in growth targets, but rather seeking alternative suitable locations on which to deliver the higher and already established growth rates from previous iterations of the Plan.

Similarly, the figures in Table 5.2 (the distribution of New Housing by Sub Area from 2011 – 2018) are lower in the submission draft document. Although there are inevitably reductions in the levels to reflect the elapsed time since the earlier draft documents, there should not be a reduction in the overall growth levels anticipated in this Plan period. There should remain an aspiration to deliver sustainable growth, in accordance with the Regional Spatial Strategy, with the flexibility to achieve the delivery of these rates in the most appropriate manner, dependent upon the sites which come forward during the plan period.

A number of the figures have reduced in terms of housing targets. Of particular note to the Church Commissioners are tables; 10.1 (Housing Development in Strood), 10.4 (Housing Development in Rochester), 10.7 (Housing Development in Chatham), 10.16 (Housing Development on Hoo Peninsular) and 10.19 (Housing Development in the Medway Valley). It is noted that this may partially reflect an elapsed time period since the previous iteration of the Plan, however it is not clear how this has been established. The Church Commissioners recognise that in recent years, the rates of housing growth have been lower than in preceding years, largely as a result of market conditions and that it is likely that rates of delivery will take some time to pick up again. Nonetheless, the NPPF encourages Local Authorities to include housing growth targets and a contingency figure (of up to 20%), where there have been recently low growth levels to ensure that growth continues to come forward, in a sustainable manner, but to achieve growth targets. It is therefore considered that in accordance with NPPF guidance, the general and area specific housing targets should be seeking to achieve more challenging delivery rates and higher overall growth levels.



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b) Are the locations identified for the supply of new housing the most appropriate when considered against all reasonable alternatives?

The Church Commissioners are major landowners in the Kingsnorth area and are supportive of the aspirations for growth in this area. It is considered that there are other sites in this area which would be capable of the delivery of development both within the Plan period and beyond. It is also considered that there are sites in addition to those expressed in this Plan, which would be capable of suitably delivering development in the event that development was not forthcoming either as quickly or to the density anticipated within the identified growth areas. The Plan should therefore be suitably flexible to consider any such provision, when supported by a suitable evidence base, to assist in meeting the plan targets in the event that the anticipated sites are not forthcoming.

c) Is there a reasonable prospect that the identified sites are deliverable/developable during the plan period, particularly those sites that have been carried forward from the local plan?

The Church Commissioners have previously noted the recognition that Lodge Hill might not meet the anticipated housing delivery rates within the Plan period. It is also considered that the delivery of growth in this area should only be sought where it can be sustainable in terms of the delivery of supporting infrastructure and the balance of housing and employment growth.

In the event that the Lodge Hill area does not deliver growth in accordance with the anticipated rates and levels, there should be provisions in the Plan for the delivery of growth in alternative, equally suitable locations, such as land around the wider Lodge Hill area and in Hoo St Werbergh. These alternative locations may be capable of delivering development in an equally, if not more sustainable manner, particularly where they release pressure on the delivery of development at Lodge Hill and allow for the delivery of infrastructure commensurate with housing growth.

d) Will the needs of gypsy and traveller communities and travelling showpeople be met by Policy CS16? Does the Policy comply with the National Planning Policy for Traveller sites (March 2012), including the requirement to set pitch and plot targets and to identify a five year supply of deliverable sites and developable sites or broad locations for the later years of the plan period?

No Comment

Hearing Participants

Medway Council
Barratt Strategic (Judith Ashton Associates) (04)
Berkeley First (75th Barton Willmore) (05)
Chatham Maritime Trust (09)
Church Commissioners (DTZ) (11)
Countryside Properties (cgMs Consulting) (14)
David Ferrett (DHA Planning) (22)
Gillingham Football Club (DHA Planning) (26)
Sounding Board Properties (DHA Planning) (66)
Medway Sports and Leisure Park (Peter Court Associates) (47)
Rochester Bridgewood Ltd (Peter Court Associates) (62)
Medway Countryside Forum (44)



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