

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

Wednesday 13<sup>th</sup> June 2pm – Matter 4 – Employment and Retail

**Inspector's Questions** 

## a) Is the overall job requirement figure realistic and achievable? Is it founded on a robust and credible evidence base?

The Church Commissioners have expressed their support for the growth of Medway's economy through the provision of higher value activities and jobs. It is considered that by pursuing this approach, the value of employment growth will be met in a more sustainable manner, requiring less land take. In doing so, this allows for provision of the inclusion of a higher employment growth target, which would reflect the aspirations of the National Planning Policy Framework to deliver sustainable development which assists in the growth of the economy.

A number of the figures have reduced in terms of employment targets in the submission draft plan, compared to previous drafts. Of particular note to the Church Commissioners are tables; 10.2 (Employment Development in Strood), 10.6 (Employment Development in Rochester) and 10.8 (Employment Development in Chatham). 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 employment growth have been lower than in preceding years, largely as a result of market conditions, nonetheless, the NPPF encourages Local Authorities to pursue development which delivers economic benefit. It is therefore considered that in accordance with NPPF guidance, the employment targets should be seeking to achieve more challenging delivery rates and higher overall growth levels.

## b) Are the proposed locations for employment development the most sustainable?

The Church Commissioners retain some reservations as to whether the identified sites will be capable of delivering the levels of growth anticipated in this Core Strategy document. The Plan should therefore be flexible to respond to the eventuality that development does not come forward as anticipated and allow for the delivery of additional sites.

It is considered that there are alternative locations, which subject to sustainability appraisal would be equally capable of the delivery of development to those contained in this Core Strategy. Equally, it may be that the identified sites are required to delivery more, or higher density, employment uses to meet the identified target levels and that in this case, alternative sites are required to deliver the housing required to support and achieve balanced and sustainable growth.

The provision of employment growth should therefore include both an increase in the density of existing employment sites as well as the delivery of additional sites in order to meet employment targets.

The Church Commissioners are landowners of industrial land at Kingsnorth, St Mary's Marshes and the Hoo Peninsula and support the promotion of additional power generation and energy storage capacity in these locations, which could make a valuable contribution to the delivery of sustainable



## Medway Core Strategy additional comments on behalf of the Church Commissioners for England (11) 25<sup>th</sup> May 2012

development and employment provision in the Medway area, which should not be precluded by this Plan.

It is also considered that there is the opportunity for the delivery of sustainable development, including employment provision at Hoo St Werbergh, in the event that is expansion was pursued as part of a sustainable and integrated extension to the existing area. This could provide an equally sustainable solution to those proposed in this plan and the plan should be flexible to the consideration of such alternatives, should development not be forthcoming as anticipated.

c) Will there be an unacceptable impact on sites of nature conservation importance?

No comment.

d) Is the strategy for meeting retail needs realistic and deliverable, particularly the reliance on development in Chatham town centre?

No comment.

## **Hearing Participants**

Medway Council
Borough Green Developments (DHA Planning) (06)
Chatham Maritime Trust (09)
Countryside Properties (CgMs Consulting) (14)
Dakers Marriott (16)
Strood Town Centre Forum (Dakers Marriott) (71)
Clifford Thurlow – Helvig Ltd (29)
Ivan Kingsley Smith (Jennifer Owen & Associates Ltd) (38)
Ropemaker Properties Limited (Turley Associates Ltd) (63)
Trustees Of Hempstead Valley (G L Hearn) (76)
The Peel Group (NLP) (72)