Dear Inspector,

Medway Core Strategy Examination: Revocation of the South East Plan and Conformity With NPPF Paragraphs 47 and 50

I refer to your letter dated 21 May 2013 concerning the above and earlier correspondence relating to this matter.

I apologise for not being able to reply until now. This is due to a combination of annual leave, researching how this matter is being dealt with nationally, assembling a brief for the appraisal you require and checking on the availability of our SHMA consultants.

I am very grateful for the clarification you have provided in terms of there being a clear explanation for the level of housing need in the Core Strategy and the need for what, in effect, would be a conformity appraisal for paragraphs 47 and 50 of the NPPF.

What we therefore propose is the following:

1. Commission ORS, the authors of the 2010 Medway SHMA, to:
   • Provide a clear statement of the “full, objectively assessed needs” underlying the 2010 study and not taking account of the South East Plan
   • Provide an explanation of the double counting point referred to in my last letter
   • Update the key outputs using the 2011 interim household projections (that we have already extrapolated to 2028)
• Present the results in a short update paper that also takes account of all available information on housing market geographies and the “starting point” provided by howmanyhomes.org.

2. The preparation of a complementary short technical note that summarises the various household and population projections so that the results from the SHMA update paper can be seen in context

3. When the preliminary results are clear consider whether engagement with neighbouring authorities or other key stakeholders would be appropriate taking account of the fact that the courts have held that the duty to cooperate ceases on submission (University of Bristol v North Somerset Council (EWHC 321 [2013]))

4. Consider whether a main modification would be appropriate to reflect the work as outlined and prepare a draft accordingly.

Having discussed the matter with ORS we feel that all of these stages could be completed by early August.

I hope that this would be a suitable way to proceed but I would be grateful for any views you might have before committing the necessary resources.

Yours sincerely,

Brian McCutcheon
Planning Policy & Design Manager