



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

**Tuesday 12th June
2pm - Matter 2 – Spatial Vision**

Inspector's Questions:

a) Does the CS present a clear spatial vision for the Borough? Has it been positively prepared and will it deliver sustainable development in accordance with national and regional policy or identified needs?

The Church Commissioners have previously expressed their support for the spatial vision of the plan, which seeks to achieve the growth of Medway's economy through the provision of higher value activities. In order to achieve the aspirations of national policy, however the plan should take a more positive approach in this. We consider in further detail the housing and employment targets in this plan in relation to those relevant matters, but generally it is considered that the growth targets could be higher, a contingency should be included for if these targets are not met and alternative sites should be allowed to come forward where these would assist in meeting targets in a sustainable manner.

The NPPF also seeks a proactive approach to growth through the delivery of sustainable development. In order to comply with the NPPF, it is considered that the Core Strategy should contain a policy which reflects the presumption in favour of sustainable development in accordance with this requirement.

Furthermore, the Church Commissioners retain concerns that the definition of sustainable development is inadequate in this context to define what will constitute sustainable and therefore acceptable growth. The Plan therefore needs to further define the nature of sustainable development or the tests against which development will be considered in order to provide greater clarity in the context of future development proposals.

b) Is the Plan founded on a robust and credible evidence base? Is it flexible and able to be monitored? What are the trigger points/actions to be taken if monitoring indicates that targets are not being met?

In addition to the nature of development, the Church Commissioners have previously expressed concerns as to the rate of development anticipated in this area and the provisions of the Plan in the event that the rate of development is not achieved as anticipated. It is considered that there are a number of other, equally sustainable, locations (such as around Lodge Hill and on the Hoo Peninsular) which would be capable of assisting in the delivery of growth, in the event that it was not forthcoming as anticipated within the provisions of this Plan. In order to meet the requirements in terms of flexibility, it is considered that this Plan should recognise the potential of alternative sites and include a contingency for their consideration, in the event that identified sites do not come forward.

It is suggested that the policy needs to contain adequate flexibility to achieve the delivery of housing growth to meet local needs. In the event that this is not achieved through the anticipated delivery of sites, there should be the provision for the consideration of alternative sites, which might be able to deliver this requirement during the Plan period, such as land around Lodge Hill and at Hoo St



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Werburch. The provision for this land to be included should through regular monitoring of delivery of development against the anticipated targets and locations for growth and provisions for the delivery of alternative sites, prior to any Plan review, in the event that these anticipated sites are not found to be forthcoming.

Hearing Participants

Medway Council

Borough Green Developments (DHA Planning) (06)

David Ferrett (DHA Planning) (22)

Medway Sports and Leisure Park (Peter Court Associates) (47)

Medway Countryside Forum (44)

Medway Magna (Graham Warren Ltd) (45)

Medway PCT NHS (46)

Medway Urban Parks and Green Spaces (48)

Sport England (70)