

# LOCAL DEVELOPMENT FRAMEWORK EXAMINATION MEDWAY COUNCIL

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Date: 23 January 2013

Mr Brian McCutcheon  
Planning Policy & Design Manager  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent ME4 4TR

Dear Mr McCutcheon

Thank you for the position statement, dated 11 January 2013, and accompanying documents. It is evident that a considerable amount of work has been undertaken by the Council and stakeholders whilst the Examination has been suspended. I note that the SA/SEA review is not yet complete and that a number of other areas of work are still being pursued, as detailed in paragraph 14 of the letter from Natural England dated 14 January 2013.

However, from the information available to date, and bearing in mind the differing views expressed by stakeholders, including Natural England, I have formed the view that it will be necessary to hold a further hearing session to assist me in reaching clear conclusions on the soundness of the Core Strategy. To facilitate this, I will draw up a list of issues and invite the Council and those who made relevant representations to submit statements to address the issues I identify. My issues are likely to include factors arising from the review of the SA/SEA and it would therefore be helpful if you could advise me when the final addendum report is likely to be published (i.e. once the outcome of the consultation has been taken into account). Once I have that information I will be able to draw up a timetable leading to a date for the hearing.

## *Other matters*

I have previously indicated that I would contact you in relation to two outstanding matters, namely gypsy and traveller policy and monitoring and implementation. I apologise for the delay in providing these comments but as you are aware I have been working primarily on the Examination of the Rother Core Strategy whilst the Medway Examination has been suspended.

## Gypsy and traveller policy

Your statement on Matter 3 *Housing supply and location* recognises that Policy CS16 was drafted before the publication in March 2012 of the *National Planning Policy Framework* and associated *Planning Policy for Traveller Sites*. You also note (paragraph 23) that 'new national policy requires a modified approach'. Given the timing of the preparation of the Core Strategy

**Gun Wharf, Dock Road,  
Chatham, Kent, ME4 4TR  
Tel: 01634 333880 Fax: 01634 332862  
Adam Waters, Programme Officer  
ldfprogrammeofficer@medway.gov.uk**

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and the publication of this new national advice, I consider that it is acceptable to delegate the allocation of sites and identification of deliverable/developable sites to a subsequent Plan. Nonetheless, as paragraph 5.46 of the CS notes, the 2006 North Kent GTAA identified a requirement for 10 new pitches in Medway over the following 5 years. I am not aware of any information before me which indicates that this need has been met, or what the current requirement is, bearing in mind that the five year period covered by the GTAA has now expired. Unless there is clear evidence to the contrary it would seem likely that there is an outstanding need for additional pitches. The policy states that sufficient sites to meet identified needs will be allocated within the forthcoming Land Allocations and Development Management DPD, whereas your statement (para 26) indicates that this may be progressed through a joint Plan with neighbouring authorities. In order to accord with the positive approach to meeting need required by national policy, I consider that the Core Strategy should be modified to include: a clear indication of how this matter is to be progressed and the likely timescale involved so that progress can be monitored; a clear commitment to provide sufficient sites to meet the need identified in an up-to-date GTAA; and a clear commitment to meet the other requirements of National Policy such as the five year supply of deliverable sites and identification of developable sites for the later plan period. I am, therefore, asking you to draft modifications to achieve this.

### Monitoring and implementation

The DCLG Plan-Making Manual includes advice on 'Delivery and implementation' and 'Flexibility and accommodating change.' The 'Challenge questions' include the following: How will the strategy cope with unexpected change; What alternative strategy is identified in the event that the development plan document strategy cannot be delivered; What would trigger the decision to change to the alternative strategy? Notwithstanding the comments made on this issue in your statement on Matter 2, I am not convinced that these questions have been adequately addressed in the CS. Your analogy of 'an early gentle hand on the tiller' may be appropriate, but the CS should give some indication of when you will place your hand on the tiller and the direction in which the boat will be steered. I also note your reluctance to consider the inclusion of any contingency measures in the event that the Lodge Hill allocation does not deliver development as expected (paragraphs 6.7 and 6.8 of the Position Statement). However, I am not convinced that the reasons you advance overcome my concerns regarding this matter as set out in my letter of 27 July 2012. In the circumstances I will include this as an issue for the further hearing session.

*Laura Graham*  
Inspector

**Gun Wharf, Dock Road,  
Chatham, Kent, ME4 4TR  
Tel: 01634 333880 Fax: 01634 332862  
Adam Waters, Programme Officer  
ldfprogrammeofficer@medway.gov.uk**