Medway Local Plan – Examination in Public

Hearing Statement: Matter 13 – Site Allocations

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Document History

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1. Introduction

1.1 This Hearing Statement has been prepared by Savills on behalf of the Church Commissioners for England (the Commissioners) in response to Matter 13 of the Inspectors' Matters, Issues and Questions for the examination of the Medway Local Plan 2041 (the Plan).

1.2 The Commissioners owns and promotes Chapter Farm, which lies wholly within Gravesham Borough and adjoins the Land West of Strood allocation in Medway. Chapter Farm and Land West of Strood form the wider cross-boundary growth location addressed by Policy SA6 of the Medway Local Plan and Policy LP6 of the Gravesham Submission Local Plan.

1.3 The Commissioners supports the principle of coordinated development across this growth location. Its comments on Policy SA6 are confined to the implications for Chapter Farm, particularly the scale, location and funding of shared infrastructure. The detailed planning requirements for Chapter Farm fall to be considered through the Gravesham planning process.

1.4 The Commissioners and its consultant team have engaged with both councils and the adjoining promoters on masterplanning and infrastructure. The Commissioners has also submitted representations supporting the principle of the Chapter Farm allocation in the Gravesham Submission Local Plan, subject to targeted changes concerning its effectiveness and deliverability.

1.5 Chapter Farm is being actively promoted and technical and masterplanning work is progressing. The comments below seek to assist coordinated delivery without prejudging the detailed layout or committing the Commissioners to an infrastructure package that has not been agreed.

1.6 The Statement also provides a short response to Question 13.196 concerning the Commissioners' Kingsnorth Expansion Area (HHH35). That response maintains the focused position advanced in its Phase 1 Matter 7 statement and does not repeat the wider employment case.

2. Response to the Inspector's Questions

Policy SA6: Land West of Strood

MIQ 13.66: Does Figure 12: Land West of Strood Concept Plan accurately show where infrastructure would be provided as regards Medway?

2.1 Figure 12 provides a high-level indication of the proposed infrastructure locations across the wider growth area. Paragraph 14.7.5 explains that the jointly commissioned masterplan informs the policy framework and that further detailed assessments will be required. The detailed siting and configuration of facilities should therefore be refined through the continuing masterplanning work, taking account of accessibility, site constraints and opportunities to co-locate complementary uses.

MIQ 13.67: Has the provision of such infrastructure requirements been considered when the circa site capacity has been derived under Policy SA6?

2.2 The wider Strood West allocation was identified for up to 4,000 homes in Medway Council's Submission Local Plan. Subsequently, Gravesham Borough Council's Regulation 19 Local Plan identified a capacity of up to 3,190 homes across the wider allocation. Collaborative masterplanning work undertaken by BPTW on behalf of the landowners and promoters is continuing to test development capacity alongside the land use mix, infrastructure requirements and detailed design.

2.3 The precise capacity therefore remains subject to refinement through that work. Infrastructure provision and housing capacity need to be considered together: the scale of development informs the infrastructure required, while the land needed for that infrastructure influences the housing capacity achievable.

2.4 Policy SA6 should retain sufficient flexibility to accommodate this refinement. In particular, the scale and land requirements of facilities such as the secondary school should be informed by the needs they would serve and considered alongside the residential layout through the continuing masterplanning process.

MIQ 13.68: How are these infrastructure requirements justified, in respect of evidence?

2.5 The Commissioners recognises the need for a new secondary school to support the wider Strood West development. However, the evidence presented does not yet adequately justify the proposed eight forms of entry or the extent of sixth-form provision.

2.6 The Commissioners, together with the landowners and promoters of sites SNF1 and SNF3, has undertaken technical work to assess the education needs of the wider allocation. The Community Infrastructure Audit and subsequent education response have been shared with Medway Council, Gravesham Borough Council and Kent County Council. This work indicates a lower level of secondary pupil generation than the proposed eight forms of entry and identifies existing local school capacity that warrants consideration.

2.7 The justification for the proposed school should explain the pupil yield assumptions, the forecast availability of places at accessible existing schools and any wider educational need that the school is intended to meet. Sixth-form provision should also be supported by evidence of likely demand and the availability of existing provision. These considerations should inform the appropriate size of the school, alongside its operational requirements.

2.8 Where the proposed school would serve needs beyond those generated by the allocation, the extent of that wider role should be made clear and reflected in the funding and delivery arrangements. Contributions should be fairly apportioned, recognising both financial contributions and land provided for the school.

2.9 The Commissioners supports continued engagement with the education authorities to agree an appropriately sized and deliverable school through the ongoing masterplanning work.

2.10 The Commissioners recognises that the Council's updated Playing Pitch Strategy assessment summary (MLP/ED11C) identifies shortfalls in football pitch provision across Medway. The summary also explains that the balance of provision differs between sub-areas. The Council should clarify how the specific requirements under Policy SA6 have been derived from that evidence, taking account of the needs generated by the wider allocation and the type, quality, accessibility, availability and capacity of existing facilities within the relevant catchment. This should also take account of the surplus of playing pitch provision identified within the relevant catchment by the Commissioners' supporting assessment submitted with its Gravesham Regulation 19 representations. Where additional provision would address existing deficiencies or serve a wider area, this should be reflected in the apportionment of costs and delivery arrangements.

2.11 Policy SA6 requires a replacement indoor sports facility. The IDP (B2, Appendix 1, page 102) identifies the proposed relocation of Strood Sports Centre, while the subsequent Built Facilities Strategy needs assessment summary (MLP/ED11A) considers replacement provision and the pressures on existing facilities. The Council should explain how this evidence translates into the specific provision required under SA6, including its scale, land requirements and relationship with the needs generated by the wider allocation. Where the facility would also replace existing provision and serve a wider catchment, this should be reflected in the funding and delivery arrangements, with the allocation making a fair and proportionate contribution.

MIQ 13.69: What proportion of the costs for infrastructure requirements under Policy SA6 are to be met by way of section 106 agreement, as per Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6).

2.12 The proportion of infrastructure costs to be met through section 106 agreements will depend on the requirements ultimately established, the needs attributable to the development and the other funding sources available. Developments whose needs are served by infrastructure delivered under Policy SA6 should contribute proportionately and fairly towards its provision. This is particularly relevant to education infrastructure, where the Commissioners' technical work indicates that the proposed provision may exceed the needs generated by the allocation itself. Where infrastructure is intended to serve a wider area, Medway Council should ensure that its costs are appropriately apportioned, with suitable delivery and funding arrangements agreed between the relevant authorities, infrastructure providers and promoters.

2.13 Where land is provided for infrastructure serving needs beyond those generated by an individual development, the contribution made through that land provision should be recognised alongside financial contributions. This should take account of the resulting reduction in developable land and its implications for development capacity and viability, so that the burden is fairly shared between the developments whose needs are being met.

2.14 Assumptions regarding Section 106 contributions should also be considered in the context of overall scheme viability. This should take account of the cumulative impact of policy requirements, infrastructure costs, development costs, market conditions and other financial obligations, to ensure that development remains deliverable over the plan period.

Policy SA14: Employment Sites

MIQ 13.196: Is there sufficient flexibility within Policy SA14 to accommodate changing economic circumstances and market requirements?

2.15 The Commissioners supports the principle of Policy SA14 and the allocation of HHH35 for employment development. Its concern remains confined to the wording of criterion 4, which anticipates development in the latter part of the plan period and links this to the occupation of employment sites on previously developed land. Although expressed as an anticipation, that wording could be read as making earlier delivery of HHH35 dependent on the occupation of other sites outside the Commissioners' control.

2.16 The Commissioners set out its proposed amendment in its Phase 1 Matter 7 hearing statement, E177, and addressed the issue at the hearing. The substantive case is not repeated here. The concern should be addressed through a focused modification that retains support for brownfield regeneration while allowing appropriate flexibility in the timing of HHH35.

2.17 That flexibility can support regeneration itself. Where HHH35 accommodates businesses relocating from Medway City Estate, suitable replacement premises may need to be available before those businesses can vacate their existing sites. Earlier delivery at HHH35 could therefore facilitate the release of occupied brownfield land, subject to the necessary infrastructure. The policy should also remain capable of responding to market demand and the planned growth at Hoo.

2.18 The Commissioners maintains the amendment proposed at E177, paragraph 3.3, as the basis for resolving its concern, while remaining willing to agree alternative wording with the Council that achieves the same outcome:

"The Kingsnorth Expansion Area (HHH35) may come forward during the plan period in response to market demand and the delivery of planned growth on the Hoo Peninsula, subject to the timely provision of necessary infrastructure."

3. Conclusion

3.1 The Commissioners supports the Land West of Strood allocation and the coordinated planning of the wider cross-boundary growth location. Its comments on SA6 concern the implications for Chapter Farm in Gravesham, rather than a challenge to the principle of the Medway allocation or an attempt to determine the Gravesham proposals through this examination.

3.2 For HHH35, the Commissioners maintains its request for a focused modification to criterion 4 of Policy SA14, allowing appropriate flexibility in delivery while supporting brownfield regeneration and the timely provision of necessary infrastructure. The wording should recognise that replacement premises may need to be delivered before occupied brownfield sites can be released.

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