



Medway Core Strategy Examination 2012

Background Paper

Conformity



1. Introduction

- 1.1 This is one of a short series of background papers prepared by Medway Council to inform the independent examination into the Medway Core Strategy 2012.
- 1.2 The papers simply draw together elements of the 'evidence base' so that information about a topic can be seen in one place. They do not contain any new information but it is hoped that they will assist all participants during the examination. Where appropriate, links are provided to source documents.
- 1.3 The series of papers cover the following topics:
- Conformity
 - Cross Boundary Issues
 - The Thames Gateway
 - Spatial Strategy
 - The Plan Preparation Process
 - The Basis for Housing and Employment Growth Targets
 - Deliverability
 - Land Allocations and Development Management DPD.
- 1.4 Paragraph 1.6 of the Core Strategy states that *"...it (the Core Strategy) must also be in 'conformity' with national policies and extensive guidance issued by the Government"*. Accordingly this paper considers this issue.

2. Background

- 2.1 The Planning & Compulsory Purchase Act 2004 requires each local planning authority to prepare a set of Local Development Documents (LDDs) that form a Local Development Framework (LDF). The Core Strategy is the first of these and should set out the overarching aims for the area, established in the Sustainable Community Strategy (SCS)¹, and is required to be in conformity with National Policy and the relevant Regional Spatial Strategy. In Medway's case this is the South East Plan.
- 2.2 Section 19 of the Planning & Compulsory Purchase Act 2004 refers to *"including national policies, the RSS for their region and their community strategy"*. PPS12 states *"In devising its strategy however, the local planning authority should be consistent with national policy and in general conformity with the regional spatial strategy."*
- 2.3 The Coalition Government has made clear its intention to revoke regional spatial strategies for some time and a mechanism to achieve that is contained within the Localism Act 2011. However, the strategies remain in force until they have undergone environmental assessments

¹ Available at: http://www.medway.gov.uk/pdf/sustainable_com_strategy_web.pdf

of the impact of their revocation. Given this situation section 4 of this paper assesses the conformity of the Submission Core Strategy with the South East Plan.

2.4 The Government issued a Draft National Planning Policy Framework (NPPF) on the 25th July 2011 for consultation until the 17th October 2011. This draft provides an indication of the direction that national guidance is taking but the content and timing of the final guidance is still uncertain. In the meantime the Council has ensured that its Core Strategy is in conformity with the following Planning Policy Statements (PPSs) and Planning Policy Guidance notes (PPGs).

- PPS1: Delivering Sustainable Development (and its Supplement – Planning and Climate Change)
- PPG2: Green Belts
- PPS3: Housing
- PPS4: Planning for Sustainable Economic Growth
- PPS5: Planning for the Historic Environment
- PPS6: Planning for Town Centres (and its guidance – Planning for Town Centres)
- PPS7: Sustainable Development in Rural Areas
- PPS9: Biodiversity and Geological Conservation
- PPS10: Planning for Sustainable Waste Management
- PPS12: Local Spatial Planning
- PPG13: Transport
- PPG17: Planning for Open Space, Sport and Recreation
- PPG20: Coastal Planning
- PPS22: Renewable Energy (and its Companion Guide)
- PPS25: Development and Flood Risk (and its Practice Guidance)

2.5 In addition a range of statutory and non statutory agencies have issued a wealth of guidance and advice relating to the preparation of LDFs. The Council has had close regard to all of this and sought to reflect it within the Core Strategy.

3. National Policy

3.1 The Policy Framework State of Medway Report² provides an objective summary of current national guidance.

3.2 Based upon it the following table sets out the main requirements of each of the documents listed above, and refers to those parts of the Core Strategy and the evidence base that are considered to achieve conformity with them.

² See evidence base document EB125

Requirement	Compliance
PPS1 – Delivering Sustainable Development and its Supplement	
<p>Promote national, regional, sub-regional and local economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative business, commercial and industrial sectors.</p>	<p>This is contained in Chapter 6, supported by points within policies in Chapter 10, 7, 4, 8 and 9.</p>
<p>Promote urban and rural regeneration to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for the people living in those communities. Policies should promote mixed-use developments for locations that allow the creation of linkages between different uses and can thereby create more vibrant places.</p>	<p>This is the central theme of Policy CS1 and Chapter 10. There is also additional support in Chapter 4, 5, 6, 7, 8 and, to a lesser degree in 9.</p>
<p>Promote communities that are inclusive, healthy, safe and crime free, whilst respecting the diverse needs of communities and the special needs of particular sectors of the community.</p>	<p>See Chapter 4 in particular, but also elements of policies CS 15 and CS16.</p>
<p>Bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing, for industrial development, for the exploitation of raw materials such as minerals, for retail and commercial development, and for leisure and recreation – taking into account issues such as accessibility and sustainable transport needs, the provision of essential infrastructure, including for sustainable waste management, and the need to avoid flood risk and other natural hazards.</p>	<p>Throughout but particularly Chapters 6 & 7 supported by 8, 4, 10 & 11.</p>
<p>Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public</p>	<p>Throughout the document but especially Chapters 4 & 10, supported by Chapter 8.</p>

<p>transport rather than having to rely on access by car, while recognising that this may be more difficult in rural areas.</p> <p>Focus developments that attract a large number of people, especially retail, leisure and office development, in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development.</p> <p>Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges.</p> <p>Promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings. Planning should seek actively to bring vacant and underused previously developed land and buildings back into beneficial use to achieve the targets the Government has set for development on previously developed land.</p> <p>Enhance as well as protect biodiversity, natural habitats, the historic environment and landscape and townscape character.</p> <p>Address, on the basis of sound science, the causes and impacts of climate change, the management of pollution and natural hazards, the safeguarding of natural resources, and the minimisation of impacts from the management and use of resources.</p> <p>In providing for the homes, jobs, services and infrastructure needed by communities, and in renewing and shaping the places where they live</p>	<p>See Chapters 6 & 10.</p> <p>See Chapter 8, and policies CS1, CS8 and the area policies (CS26 – 33)</p> <p>See policy CS1.</p> <p>See policies CS6 – 8 and CS11 &12.</p> <p>See Chapter 4 and, in relation to mitigation, also Chapters 7 and 9.</p> <p>See policies CS 2-4 and, to a lesser degree, Chapter 7 in terms of managing resources.</p>
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<p>and work, secure the highest viable resource and energy efficiency and reduction in emissions;</p> <p>Deliver patterns of urban growth and sustainable rural developments that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking; and, which overall, reduce the need to travel, especially by car;</p> <p>Secure new development and shape places that minimise vulnerability, and provide resilience to climate change, which are consistent with social cohesion and inclusion;</p> <p>Conserve and enhance biodiversity, recognising that the distribution of habitats and species will be affected by climate change;</p> <p>Reflect the development needs and interests of communities and enable them to contribute effectively to tackling climate change; and</p> <p>Respond to the concerns of business and encourage competitiveness and technological innovation in mitigating and adapting to climate change.</p>	<p>See Chapter 8 and policies CS31-33 and cross cutting policy CS8.</p> <p>See Policy CS3</p> <p>See Policy CS6</p> <p>See policies CS3 and CS15</p> <p>See Chapter 6,</p>
<p>PPS3: Housing</p>	
<p>To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community</p> <p>To widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need</p> <p>To improve affordability across the housing market, including by increasing the supply of housing</p> <p>To create sustainable, inclusive, mixed communities in all areas, both urban and rural</p>	<p>See Chapter 6</p> <p>See Chapter 6</p> <p>See Chapter 6 supported by policies CS1 and CS2</p> <p>See Policy CS2, Chapter 6 and Area Policies.</p>

<p>High quality housing that is well designed and built to a high standard</p> <p>A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural</p> <p>A sufficient quantity of housing taking into account need and demand and seeking to improve choice</p> <p>Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure</p> <p>A flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously developed land, where appropriate.</p>	<p>See Chapter 6 supported by policies CS2 and CS3</p> <p>See Chapter 6</p> <p>See SHMA, SLAA, Chapter 3 and Policy CS13</p> <p>See chapters 3 and 6, and Area Policies.</p> <p>See Chapters 3 and 6 and policy CS1</p>
<p>PPS4: Planning for Sustainable Economic Growth</p>	
<p>New economic growth and development of main town centre uses to be focused in existing centres, with the aim of offering a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities</p> <p>Competition between retailers and enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres, which allow genuine choice to meet the needs of the entire community (particularly socially excluded groups)</p> <p>The historic, archaeological and architectural heritage of centres to be conserved and, where appropriate, enhanced to provide a sense of place and a focus for the community and for civic activity</p> <p>Raise the quality of life and the environment in rural areas by promoting thriving, inclusive and</p>	<p>See Policies CS1 and CS19 and Chapter 10 in relation to 'local neighbourhoods'.</p> <p>See Retail Needs Study 2009 and the Employment Land Consolidation Study, various development briefs Policy CS19</p> <p>Various references but see in particular Policy CS12.</p> <p>See policies CS18, CS31, CS32 and CS33.</p>

<p>locally distinctive rural communities whilst continuing to protect the open countryside for the benefit of all</p>	
<p>PPS5: Planning for the Historic Environment</p>	
<p>Regional and local planning authorities should ensure that they have evidence about the historic environment and heritage assets in their area and that this is publicly documented. The level of detail of the evidence should be proportionate and sufficient to inform adequately the plan-making process.</p> <p>Local planning authorities should either maintain or have access to a historic environment record.</p> <p>Local planning authorities should use the evidence to assess the type, numbers, distribution, significance and condition of heritage assets and the contribution that they may make to their environment now and in the future. It should also be used to help predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.</p> <p>Regional spatial strategies (RSS) and local development frameworks (LDF) should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area, taking into account the variations in type and distribution of heritage asset, as well as the contribution made by the historic environment by virtue of:</p> <ul style="list-style-type: none"> (i) its influence on the character of the environment and an area's sense of place (ii) its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development (iii) the stimulus it can provide to inspire new development of imaginative and high quality design 	<p>This can be found in the Built Environment State of Medway Report³, as well as current Conservation Area Appraisals and Design Briefs</p> <p>See Built Environment State of Medway Report supporting text to Policy CS12</p> <p>See Policy CS12</p> <p>See spatial vision and policies CS12 and CS18</p>

³ See evidence base document EB105

<p>(iv) the re-use of existing fabric, minimising waste; and (v) its mixed and flexible patterns of land use that are likely to be, and remain, sustainable.</p> <p>The level of detail contained in an RSS or LDF should reflect the scale of the area covered by the plan and the significance of the heritage assets within it.</p> <p>Plans at a local level are likely to consider investment in and enhancement of historic places, including the public realm, in more detail. They should include consideration of how best to conserve individual, groups or types of heritage assets that are most at risk of loss through neglect, decay or other threats.</p>	<p>Will primarily be addressed in forthcoming Land Allocations DPD</p>
<p>PPS6: Planning for Town Centres</p>	
<p>Promote their vitality and viability by planning for their promotion, growth and enhancement and by focusing development in them and encouraging a wide range of services in a good environment, accessible to all</p> <p>Enhance consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community, and particularly socially-excluded groups</p> <p>Support efficient, competitive and innovative retail, leisure, tourism and other sectors, with improving productivity; and</p> <p>Improve accessibility, ensuring that existing or new development is, or will be, accessible and well-served by a choice of means of transport.</p> <p>To promote social inclusion, ensuring that communities have access to a range of main town centre uses, and that deficiencies in provision in areas with poor access to facilities are remedied</p>	<p>See Policy CS19</p> <p>See policy CS19. In addition, local centres are identified in the Area policies</p> <p>See policies CS28 and CS19</p> <p>See Chapter 8</p> <p>Support for initiatives to reduce deprivation and to support the retention and development of local services and facilities is contained in the Area policies.</p>

<p>To encourage investment to regenerate deprived areas, creating additional employment opportunities and an improved physical environment</p>	<p>See Area policies plus CS8 and CS2</p>
<p>To promote economic growth</p>	<p>See Chapter 6</p>
<p>To deliver more sustainable patterns of development through high-density, mixed-use development and promoting sustainable transport choices, including reducing the need to travel and providing alternatives to car use</p>	<p>See in particular policies CS1 and CS24, and CS33.</p>
<p>To promote high quality and inclusive design, improve the quality of the public realm and open spaces, protect and enhance the architectural and historic heritage of centres, provide a sense of place and a focus for the community and for civic activity and ensure that town centres provide an attractive, accessible and safe environment for businesses, shoppers and residents</p>	<p>Supported by policy CS8 and CS2, as well as CS12 and the Area policies in Chapter 10.</p>
<p>PPS7: Sustainable Development in Rural Areas</p>	
<p>To raise the quality of life and the environment in rural areas through the promotion of:</p> <ul style="list-style-type: none"> ○ Thriving, inclusive and sustainable rural communities, ensuring people have decent places to live by improving the quality and sustainability of local environments and neighbourhoods ○ Sustainable economic growth and diversification ○ Good quality, sustainable development that respects and, where possible, enhances local distinctiveness and the intrinsic qualities of the countryside; and ○ Continued protection of the open countryside for the benefit of all, with the highest level of protection for our most valued landscapes and environmental resources. 	<p>Generally addressed by policies CS31-33</p> <p>Additionally supported by policies in Chapter 5</p> <p>See Chapters 6 and 10</p> <p>As above plus policies CS2 and CS19</p> <p>See Chapter 4, especially policies CS3-8, and area policies CS30-33.</p>

<p>To promote more sustainable patterns of development:</p> <ul style="list-style-type: none"> ○ Focusing most development in, or next to, existing towns and villages ○ Preventing urban sprawl ○ Discouraging the development of 'greenfield' land ○ Promoting a range of uses to maximise the potential benefits of the countryside fringing urban areas; and ○ Providing appropriate leisure opportunities to enable urban and rural dwellers to enjoy the wider countryside. <p>Promoting economic performance: By developing competitive, diverse and thriving rural enterprise that provides a range of jobs and underpins strong economies.</p> <p>Promoting sustainable, diverse and adaptable agriculture sectors where farming achieves high environmental standards, minimising impact on natural resources, and manages valued landscapes and biodiversity; contributes both directly and indirectly to rural economic diversity; is itself competitive and profitable; and provides high quality products that the public wants</p>	<p>This is supported through CS1 and the Area policies in Chapter 10.</p> <p>See Policy CS17</p> <p>See Policy CS7</p> <p>See Policies CS17, CS31 and CS32</p> <p>See policies CS6, CS7, CS17, CS31 and CS32</p>
<p>PPS9: Biodiversity and Geological Conservation</p>	
<p>Indicate the location of designated sites of importance for biodiversity and geodiversity, making clear distinctions between the hierarchy of international, national, regional and locally designated sites; and</p> <p>Identify and support any areas or sites for the restoration or creation of new priority habitats which contribute to regional targets.</p> <p>Networks of natural habitats provide a valuable resource. They can link sites of biodiversity importance and provide routes or stepping stones for the migration, dispersal and genetic exchange of species in the wider environment. Local authorities should</p>	<p>See supporting text to policy CS6</p> <p>See Policy CS6 but much work being done in parallel with the Core Strategy on this issue.</p> <p>See Policy CS6 and CS8</p>

<p>aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans. Such networks should be protected from development, and, where possible, strengthened by or integrated within it. This may be done as part of a wider strategy for the protection and extension of open space and access routes such as canals and rivers, including those within urban areas.</p>	
<p>PPS10: Planning for Sustainable Waste Management</p>	
<p>Help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for</p> <p>Provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities</p> <p>Help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations</p> <p>Protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and in determining planning applications.</p> <p>Allocate sites to support the pattern of waste management facilities set out in the RSS in accordance with the broad locations identified in the RSS; and</p> <p>Allocate sites and areas suitable for new or enhanced waste management facilities to support the apportionment set out in the RSS.</p>	<p>Chapter 7 covers all the matters relating to waste provision along with strategic objective 15 within Chapter 3</p> <p>This will be addressed further during preparation of the Land Allocations and Development Management DPD</p> <p>As above</p>
<p>PPS12: Local Spatial Planning</p>	
<p>Every local planning authority should</p>	

<p>produce a core strategy which includes:</p> <p>(1) an overall vision which sets out how the area and the places within it should develop;</p> <p>(2) strategic objectives for the area focusing on the key issues to be addressed;</p> <p>(3) a delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and</p> <p>(4) clear arrangements for managing and monitoring the delivery of the strategy.</p> <p>Local authorities should explore and exploit opportunities for joint working on core strategies.</p> <p>Core strategies may allocate strategic sites for development. These should be those sites considered central to achievement of the strategy. Progress on the core strategy should not be held up by inclusion of non strategic sites.</p> <p>The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided.</p>	<p>See Chapters 2 and 3, as well as Chapter 10</p> <p>See Chapter 3 and figure 3 2</p> <p>See Chapter 11</p> <p>This is contained in Chapter 11</p> <p>Meetings were held throughout the formulation of the document with neighbouring authorities and where practicable joint working occurred.⁴</p> <p>Lodge Hill is the only strategic allocation included in this document</p> <p>See Chapter 11</p>
<p>PPG13: Transport</p>	
<p>Actively manage the pattern of urban growth to make the fullest use of public transport, and focus major generators of travel demand in city, town and district centres and near to</p>	<p>See Chapter 8 and policy CS24. These are also supported by policies CS18 and CS19 in Chapter 6.</p>

⁴ Further detail set out in Cross Boundary Issues background paper.

<p>major public transport interchanges</p> <p>Locate day to day facilities which need to be near their clients in local centres so that they are accessible by walking and cycling</p> <p>Accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling</p> <p>Ensure that development comprising jobs, shopping, leisure and services offers a realistic choice of access by public transport, walking, and cycling, recognising that this may be less achievable in some rural areas</p> <p>In rural areas, locate most development for housing, jobs, shopping, leisure and services in local service centres which are designated in the development plan to act as focal points for housing, transport and other services, and encourage better transport provision in the countryside</p> <p>Ensure that strategies in the development and local transport plan complement each other and that consideration of development plan allocations and local transport investment and priorities are closely linked</p> <p>Use parking policies, alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car for work and other journeys</p> <p>Give priority to people over ease of traffic movement and plan to provide more road space to pedestrians, cyclists and public transport in town centres, local neighbourhoods and other areas with a mixture of land</p>	<p>There is support for retention and development of local services and facilities through Area Policies, with particular regard to the rural areas in CS31 & 32. Additionally, policy CS2 mentions this specifically under bullet point 10. Bullet point 6 of CS24 refers to walking and cycling for local journeys</p> <p>See Chapter 5 and the Area policies in Chapter 10, plus Chapter 8.</p> <p>This is covered by Chapter 8 and policy CS24, supported by policies CS18 and CS19 in Chapter 6 and CS31-33</p> <p>See Chapter 10, supported by Chapter 8 and Chapter 5.</p> <p>See Chapter 8 and Appendix E, as well as the Infrastructure Delivery Schedule</p> <p>See Policy CS24</p> <p>See Chapter 8 and policy CS24, and also supported through other policies throughout such as CS8</p>
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<p>uses</p> <p>Ensure that the needs of disabled people as pedestrians, public transport users and motorists - are taken into account in the implementation of planning policies and traffic management schemes, and in the design of individual developments; consider how best to reduce crime and the fear of crime, and seek by the design and layout of developments and areas, to secure community safety and road safety and</p> <p>Protect sites and routes, which could be critical in developing infrastructure to widen transport choices for both passenger and freight movements.</p>	<p>See policy CS2</p> <p>No new transport corridors are considered necessary</p>
<p>PPG17: Planning for Open Space, Sport and Recreation</p>	
<p>Supporting an urban renaissance - local networks of high quality, well managed and maintained open spaces, sports and recreational facilities help create urban environments that are attractive, clean and safe. Green spaces are important as areas for nature conservation, biodiversity and as 'green lungs' which help improve air quality</p> <p>Supporting a rural renewal - the countryside can provide opportunities for recreation and visitors can play an important role in the regeneration of the economies of rural areas</p> <p>Promoting social inclusion and community cohesion - well planned and maintained open spaces and recreational facilities can help improve people's sense of well being and serve as a focal point for community activities and social interaction</p> <p>Health and well being - open spaces, sport and recreational facilities have a vital role to play in promoting healthy living and preventing illness, and in the social development of children of all ages through play,</p>	<p>See Policy CS8, and CS10 and its supporting text.</p> <p>See Policy CS7, as well as CS24 and CS18 plus CS31 and CS32 covering the established rural areas</p> <p>See Policy CS8</p> <p>See Policy CS8</p>

<p>sporting activities and interaction with others</p> <p>Promoting more sustainable development - by ensuring that open space, sports and recreational facilities (particularly in urban areas) are easily accessible by walking and cycling, and that more heavily used or intensive sports and recreational facilities are planned for locations well served by public transport.</p>	<p>See policy CS10 and the 10th bullet point included in policy CS2. These are in addition to aims in policy CS24 and 25 promoting healthier lifestyles</p>
<p>PPG20: Coastal Planning</p>	
<p>Local authorities should recognise the need to protect remaining areas of nature conservation value within the developed coast. In some undesignated areas the scope for new development is becoming increasingly limited, and opportunities for development should be sought inland.</p> <p>Where new development requires a coastal location, the developed coast will usually provide the best option, provided that due regard is paid to the risks of erosion or flooding.</p> <p>New development should not generally be permitted in areas, which would need expensive engineering works, either to protect developments on land subject to erosion by the sea or to defend land which might be inundated by the sea. There is also the need to consider the possibility of such works causing a transfer of risks to other areas.</p> <p>The degree of risk involved will have to be carefully considered and policies will specifically be needed to control or restrict development:</p> <ul style="list-style-type: none"> • in low-lying coastal areas; • on land close to eroding cliffs or other eroding coastlines; and • on land in coastal areas subject to instability. <p>These plans are required to include policies and proposals for the improvement of the physical environment and for the conservation</p>	<p>See CS3, CS5 and CS6 plus CS25</p> <p>See policy CS31, and policies in Chapter 6 plus policy CS5</p> <p>See Policy CS5 and its reference to the High Level Appraisal and the Update to the SFRA</p> <p>See in particular Policies CS6-8</p>

<p>of natural beauty and amenity of the land. These policies and proposals may include action by the local planning authority, often in partnership with other agencies:</p> <ul style="list-style-type: none"> • to improve and enhance the coast in areas of natural beauty and of high conservation value; • to regenerate rundown coastal towns and ports; and • to restore stretches of the despoiled coastline. 	
<p>PPS22: Renewable Energy (and its Companion)</p>	
<p>By contributing to the nation's energy needs, ensuring all homes are adequately and affordably heated; and providing new sources of energy in remote areas</p> <p>By reductions in emissions of greenhouse gases and thereby reducing the potential for the environment to be affected by climate change</p> <p>By reducing the nation's reliance on ever diminishing supplies of fossil fuels; and</p> <p>Through the creation of jobs directly related to renewable energy developments, but also in the development of new technologies. In rural areas, renewable energy projects have the potential to play an increasingly important role in the diversification of rural economies</p> <p>Local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy developments. Such policies:</p> <ul style="list-style-type: none"> • Should ensure that requirement to generate on-site renewable energy is only applied to developments where the installation of renewable energy generation equipment is viable given the type of development 	<p>See Policy CS21</p> <p>See Policies CS3 and CS4</p> <p>See policies CS3 and 4</p> <p>See Policy CS17.</p> <p>See Policy CS4</p>

<p>proposed, its location, and design;</p> <ul style="list-style-type: none"> Should not be framed in such a way as to place an undue burden on developers, for example, by specifying that all energy to be used in a development should come from on-site renewable generation 	
<p>PPS25: Development and Flood Risk (and its Practice guidance)</p>	
<p>Identifying land at risk and the degree of risk of flooding from river, sea and other sources in their areas</p>	<p>See Figure 4 1 and Policy CS5</p>
<p>Preparing Regional Flood Risk Appraisals or Strategic Flood Risk Assessments as appropriate</p>	<p>An update to the Strategic Flood Risk Assessment and a High Level Appraisal of the Potential Solutions to manage Flood Risk in the Urban Medway were completed in 2011.⁵</p>
<p>Framing policies for the location of development which avoid flood risk to people and property where possible, and manage any residual risk, taking account of the impacts of climate change</p>	<p>See Policy CS5 and its supporting text. There is also mention within CS16 as to where sites will be acceptable</p>
<p>Only permitting development in areas of flood risk when there are no reasonably available sites in areas of lower flood risk and benefits of the development outweigh the risks from flooding</p>	<p>See Policy CS5 and the High Level Appraisal or the Update to the SFRA</p>
<p>Safeguarding land from development that is required for current and future flood management e.g. conveyance and storage of floodwater, and flood defences</p>	<p>See policy CS3</p>
<p>Reducing flood risk to and from new development through location, layout and design, incorporating sustainable drainage systems (SUDS)</p>	<p>See Policy CS3</p>
<p>Using opportunities offered by new development to reduce the causes and impacts of flooding e.g. surface water management plans; making the most of the benefits of green infrastructure for flood storage, conveyance and SUDS; re-creating</p>	<p>See Policy CS3</p>

⁵ See evidence base document EB55.

functional floodplain; and setting back defences.	
MPS1: Planning and Minerals	
To ensure, so far as practicable, the prudent, efficient and sustainable use of minerals and recycling of suitable materials, thereby minimizing the requirement for new primary extraction	See Policy CS22
To conserve mineral resources through appropriate domestic provision and timing of supply	Paragraph 2 of policy CS22 allows for a continual 7 year land bank
To safeguard mineral resources as far as possible	See Figure 7 1
To prevent or minimise production of mineral waste	Policy CS22 states that these issues will be addressed within the subsequent Land Allocations and Development Management DPD
To secure working practices which prevent or reduce as far as possible, impacts on the environment and human health arising from the extraction, processing, management or transportation of minerals	
To protect internationally and nationally designated areas of landscape value and nature conservation importance from minerals development, other than in the exceptional circumstances detailed in paragraph 14 of this statement	See Policy CS22
To secure adequate and steady supplies of minerals needed by society and the economy within the limits set by the environment, assessed through sustainability appraisal, without irreversible damage	Figure 7 1 maps the areas that are expected to be considered for future mineral extraction to ensure supply and the sustainability appraisal considered different options for minerals
To maximise the benefits and minimise the impacts of minerals operations over their full life cycle	Will be dealt with in the Land Allocations DPD
To promote the sustainable transport of minerals by rail, sea or inland waterways	The last paragraph of policy CS22 safeguards existing wharves
To protect and seek to enhance the overall quality of the environment	Will be dealt with in the Land Allocations DPD

<p>once extraction has ceased, through high standards of restoration, and to safeguard the long-term potential of land for a wide range of after-uses</p>	
<p>To secure closer integration of minerals planning policy with national policy on sustainable construction and waste management and other applicable environmental protection legislation; and</p>	<p>See Bullet point 1 of policy CS22</p>
<p>To encourage the use of high quality materials for the purposes for which they are most suitable.</p>	<p>See Paragraph 7.31</p>

3.3 Reflecting detailed analysis, summarised in the table above, the Council considers that the Core Strategy conforms closely to current national policy as set out extant PPSs and PPGs.

4. Regional Strategy

4.1 A similar assessment has been carried out to ensure conformity with the South East Plan. This is set out in the table below.

4.2 Following the winding up of the regional assemblies and the closure of Government regional offices, there is no mechanism available for a local planning authority to obtain a Certificate of Conformity, as still technically required by the Planning & Compulsory Purchase Act 2004. As such this assessment is considered to be an appropriate substitute and it has been informed by the Council's intimate knowledge of the South East Plan as a 'principle authority' required to assist with its preparation.

Requirement	Compliance
The South East Plan	
Core Regional Policies	
Policy SP1 Sub-Regions of the South East	See Vision and Strategic Objectives, Para 3.15.
Policy SP2 Regional Hubs	See Policy CS28
Policy SP3 Urban Focus and Urban Regeneration	See Policy CS1
Policy SP4 Regeneration and Social Inclusion	See Policies CS13, CS14, CS17 and CS20 and the spatial vision of the CS, pages 21-22
Policy SP5 Green Belts	No changes to the Green Belt are proposed in the Core Strategy
Policy CC1 Sustainable Development	See Policies CS2, CS3 and CS4 and CS14
Policy CC2 Climate Change	See Policy CS3
Policy CC3 Resource Use	See policies CS22, CS 23, CS2, CS3, CS4. and CS24
Policy CC4 Sustainable Design and Construction	See Policy CS2
Policy CC5 Supporting an Aging Population	See Policies CS9, CS11, CS15 and CS20
Policy CC6 Sustainable Communities and character of the Environment	See spatial vision and strategic objectives
Policy CC7 Infrastructure and Implementation	See Policies CS34 and CS35
Policy CC8 Green Infrastructure	See Policy CS8
Policy CC9 Use of Public Land	See Policy CS1
Policy RE1 Contributing to the UK's Long Term Competitiveness	See Policy CS17
Policy RE2 Supporting Nationally and Regionally Important Sectors and Clusters	See Policy CS17
Policy RE3 Employment and Land Provision	See Policy CS17 and CS19
Policy RE4 Human Resource Management	See Policy CS20

Policy RE5 Smart Growth	See Policy CS17
Policy RE6 Competitiveness and addressing Structural Economic Weakness	See Policy CS17
Policy H1 Regional Housing Provision	See Policy CS13
Policy H2 Managing the delivery of the Regional Housing Provision	See Policy CS34
Policy H3 Affordable Housing	See Policy CS14
Policy H4 Type and Size of New Housing	See Policy CS15
Policy H5 Housing design and Density	See Policy CS15
Policy H6 Making better use of Existing Stock	See Policy CS15
PolicyT1 Manage and Invest	See Policy CS24
Policy T2 Mobility and Management	See Policy CS24
Policy T3 Charging	See Medway Local Transport Plan 3 ⁶
Policy T4 Parking	See Policy CS24
Policy T5 Travel Plans and Advice	See Policy CS24 but also matter for future DPD
Policy T6 Communications Technology	See spatial vision
Policy T7 Rural Transport	See Policy CS31 and CS32
Policy T8 Regional Spokes	See Policy CS28
Policy T9 Airports	See Policy CS24
Policy T11 Rail Freight	See Policy CS24
Policy T12 Freight and Site and Safeguarding	See Policy CS24
Policy T13 International Interchanges	See Policy CS25 (Thamesport)
Policy T14 Transport Investment and Management Priorities	Not directly relevant to the Medway CS.

⁶ See evidence base document EB65

Policy NRM1 Sustainable Water Resources and Groundwater Quality	See policies CS3 and CS25
Policy NRM2 Water Quality	See policies CS3 and CS25
Policy NRM3 Strategic Water Resources	See Policy CS3
Policy NRM4 Sustainable Flood Risk Management	See Policy CS5
Policy NRM5 Conservation and Improvement of Biodiversity	See Policy CS6
Policy NRM6 Thames Basin Heaths and Special Protection Area	N/A.
Policy NRM7 Woodlands	See Policy CS7
Policy NRM8 Coastal Management	See Policy CS6 and CS7
Policy NRM9 Air Quality	See Policy CS3
Policy NRM10 Noise	See Policy CS2
Policy NRM11 Development Design for Energy Efficiency and Renewable Energy.	See Policy CS4
Policy NRM12 Combined Heat and Power	See Policy CS4
Policy NRM13 Regional Renewable Energy Targets	See Policy CS4
Policy NRM14 Sub-Regional Targets for Land-Based Renewable Energy	See Policy CS4
Policy NRM15 Location of Renewable Energy Development	See Policy CS4
Policy NRM16 Renewable Energy Development Criteria	See Policy CS4
Policy W1 Waste Reduction	See Policy CS23
Policy W2 Sustainable Design, Construction and Demolition	See Policy CS22
Policy W3 Regional Self Sufficiency	See Policy CS23.
Policy W4 Sub-Regional Self-Sufficiency	See Policy CS23

⁷ See evidence base document EB129

Policy W6 Recycling and Composting	See Policy CS23
Policy W7 Waste Management capacity Requirements	See Waste SOM ⁷ and CS23
Policy W8 Waste Separation	See Waste SOM
Policy W9 New Markets	N/A
Policy W10 Regionally Significant Facilities	See Waste SOM and Policy CS23
Policy W11 Biomass	See Policy CS23
Policy W12 Other Recovery and Diversion Technologies	See Policy CS23
Policy W13 Landfill Requirements	See Policy CS23
Policy W14 Restoration	Matter for the Land Allocation Development Plan Document
Policy W15 Hazardous Wastes and other Specialist Waste Facilities	See Policy CS23
Policy W17 Location of Waste Management Facilities	See PolicyCS23
Policy M1 Sustainable Construction	See Policy CS22
Policy M2 Recycled and Secondary Aggregates	See Policy CS22
Policy M3 Primary Aggregates	See Policy CS22
Policy M4 Other Minerals	See Waste SOM.
Policy M5 Safeguarding of Mineral reserves, Wharves and Rail Depots	See Policy CS22
Policy C3 Areas of Outstanding Natural Beauty	See Policy CS7
Policy C4 Landscape and Countryside Management	See Policy CS7
Policy C5 Managing the Rural-Urban Fringe	See Policies CS7 and CS8 and area policies, particularly 30-33)
Policy C6 Countryside Access and Rights of Way Management	See Policies CS8, CS6, CS7, CS31 and CS32.
Policy BE1 Management for an Urban Renaissance	See Policy CS1

Policy BE2 Suburban Intensification	See Policy CS28
Policy BE3 Suburban Renewal	See Policies CS26, CS27, CS28, CS29, CS30 and CS32
Policy BE4 The Role of Small Rural Towns ('Market' towns)	See Policies CS31 and CS33.
Policy BE5 Village Management	See Policies CS32 and CS31
Policy BE6 Management of the Historic Environment	See Policy CS12
Policy TC1 Strategic Network of Town Centres	See Policy CS1 and CS28
Policy TC2 New Development and Redevelopment in Town Centres	See Policy CS19
Policy TC3 Out-of-Centre Regional/Sub-Regional Shopping Centres	See Policy CS19
Policy TRS1 Coastal Resorts	N/A
Policy TSR2 Rural Tourism	See Policies CS18 and CS31
Policy TSR3 Regionally Significant Sports Facilities	See Policy CS10
Policy TSR4 Tourism Attractions	See Policy CS18
Policy TSR5 Tourist Accommodation	See Policies CS18 and CS31
Policy TSR6 Visitor Management	See Policies CS18, CS2, CS6 and CS7
Policy TSR7 Priority Areas for Tourism	See Policy CS18
Policy S1 Supporting Healthy Communities	See Policies CS9, CS 10 and CS11 Policy CS9
Policy S2 Promoting Sustainable Health Services	See Policies CS9, CS 10 and CS11 Policy CS9
Policy S3 Education and Skills	See Policy CS20
Policy S4 Higher and Further Education	See Policy CS20
Policy S5 Cultural and Sporting Activity	See Policies CS10 and Policy CS11

Policy S6 Community Infrastructure	See Policy CS9 and Area policies.
Relevant Sub-Regional Policies	
Kent Thames Gateway	
Policy KTG1 Core Strategy	See Policies CS1, CS2, CS7, CS14, CS24, CS25 and CS28 Policy CS17 (page 69) addresses Medway's economic growth as part of the wider Thames Gateway.
Policy KTG2 Economic Growth and employment	See Policies CS1, CS17, CS28 and CS33
Policy KTG3 Employment Locations	See Policy CS17
Policy KTG4 Amount and Distribution of housing Development	See Policy CS13
Policy KTG5 The Role of Retail Centres	See Policy CS28
Policy KTG6 Flood Risk	See Policy CS5
Policy KTG7 Green Initiatives	See Policy CS8

5. Sustainable Community Strategy

- 5.1 PPS12 states that “...*spatial planning objectives for local areas, as set out in the LDF, should be aligned not only with national and regional plans, but also with the shared local priorities set out in Sustainable Community Strategies where these are consistent with national and regional policy*”.
- 5.2 As indicated in Chapters 2 and 3 of the Core Strategy the Medway Sustainable Community Strategy is fully reflected and integrated in both planning policy and in the underlying evidence base. The preparation processes were also fully aligned, as explained in paragraphs 2.1 and 3.1 of the Core Strategy.

6. Draft National Planning Policy Framework (dNPPF)

- 6.1 As referenced earlier in this paper the Government issued the Draft National Planning Policy Framework (NPPF) on the 25th July 2011 for consultation until the 17th October 2011. The NPPF attempts to bring together and paraphrase over 1,000 pages of extant guidance in just 52 pages.
- 6.2 Publication of the draft initiated an intense national debate and there is considerable uncertainty as to what the form and content of the final Framework might be. However the draft stresses the importance of having up to date ‘local plans’ in place as quickly as possible and there are few indications that the general approach to plan making is to change.

- 6.3 It is highly likely that the final Framework will be issued during the Core Strategy Examination, which adds to the uncertainty of the process. However the Council has taken the view that it should not delay submission of the Core Strategy and regards the close conformity with current guidance to be significant.

7. Conclusions

- 7.1 A thorough analysis, summarised in this paper, demonstrates that the Submission Core Strategy is in conformity with extant national guidance and the relevant regional spatial strategy, which remains in force for the present. It has also been formulated alongside the Medway Sustainable Community Strategy and fully reflects the content of that strategy.
- 7.2 As such the Council is confident that it fully meets the requirements of the Planning and Compulsory Purchase Act 2004 and PPS12 in that regard.
- 7.3 Achieving full conformity is always challenging when significant changes to national and regional policy occur and further changes are imminent. However the Council is content that it could not have done more to reflect current circumstances.