

Name: Diane Gee

Reference

51

Organisation

On Behalf Of

Type of Consultee

Member of the public

MEDWAY COUNCIL
FILE REF
29 FEB 2016
TO:
ACTION:



Dear Sir,

As you see I live on the A228 & know the traffic congestion problems since Rand. Re the item in the Cuxton notice Board I think the question needs to be asked does Medway Council have any strategic traffic management plan for the steadily growing traffic on the 228 P

I find it quite breathtaking, that in the

2

Same publication, on the very same page, while requesting ideas & solutions, suggestions are requested as to where more houses could be built in Cuxton! I suggest this is clearly not a solution to traffic calming & reduction. In future, all future housing development proposals in this area should be granted only if clear plans are in place to redirect traffic.

If the plan for a crossing with approach roads near to Shorne ie

3.
C'option of Thames crossing
& nearest to A228 junction
with A2/M2, go ahead
the A228 will become
a car park. It is
difficult enough to
cross it now. Are
planning officers aware
that more houses in
a concentrated area
will inevitably mean
more cars = more traffic!

Yours Sincerely
Mrs Diane Gee

Name: John Hill

Reference

52

Organisation

On Behalf Of

Type of Consultee

Member of the public

56k February 2016

Planning Policy, Regeneration, Community and Culture,
Medway Council,
CHATHAM.

Dear Sirs, Local Plan.

08 FEB 2016

I wish to respond to the consultation as follows :-

Tourism, 22 Possibly another hotel, a basic type hostel (for walkers and cyclists following the nearby North Downs Way) and a few more B/B places.

23/24 Para. 97 refers to areas of the countryside being overlooked and little investment put in. Although there can be some further investment this I feel should not entail the spoilation of relatively unspoilt areas by the provision of numerous signs etc. which would spoil the very thing that people had come to visit.

Retail, Commercial, Leisure and Town Centres.

25. Not sure about this but anything to reduce the number of vacant properties will be good.

26. Possibly to meet current identified capacity only.

29. Generally to be against these.

Environment Para. 11.10 Good to see that it is appreciated that care is needed to ensure that special and distinct qualities of riverside and coastal landscapes are not lost.

Built Environment.

33. Any regeneration schemes must be of a very good design and enhance the area.

34. Clean and tidy, good community spirit and well maintained buildings / open spaces.

35. Rochester city centre, Chatham Dockyard and the riverside.

So far as Rochester city centre is concerned there is a need for conservation policies to be enforced more than they are at present (ie. there are unsuitable shop fascias, superfluous advertising boards and badly maintained buildings.)

37. To be of a high standard - when developments are such people seem to appreciate and respect them more.

Rural Issues.

39. Any provision made should be in fairly small scale developments (e.g. conversion of existing vacant/derelict farm buildings)

Open Space. 49. The integrity of open space estate should definitely be preserved and not rationalised, - this is most important, especially bearing in mind the growth in population.

52. Perhaps a mix of these.

Natural resources.

56. Best agricultural land should certainly be protected, but some of the less productive land could possibly be designated for housing development.

Minerals.

59. Existing wharves should remain.

Flood Risk. 66. I would think that it is most important that they are taken into account especially bearing in mind the recent increase in flooding across the country.

Development strategy.

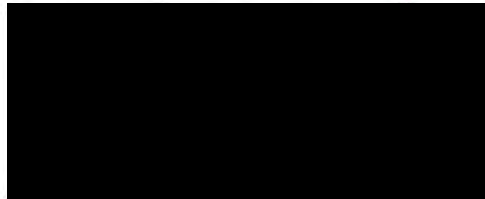
80. Generally, yes.

84. No, except possibly very minor change(s)

87. Rochester City Centre conservation policies need to be enforced more than they are at present.

- Para. 27.2 Pleased to see that provision of high quality homes etc. will be a key part of the renaissance.
- Para. 27.16 Rather surprised to see reference to possible redevelopment of Medway City Estate.
- Para. 27.20 Reference is made to possible review of green belt boundaries. Rather concerned at this and it will have to be looked at carefully.
- Paras. 27.25
- 27.26 Rather concerned over reference to free standing settlements in
- 27.28 countryside. If any of these are done then they must be in such a manner that they fit in with surroundings and not of an urban appearance.
- Para. 27.31 Reference to scope for extension between Rainham and Lower Rainham Road - this area, to my mind, should be kept as a rural area.

Yours faithfully,



Name: Anonymous

Reference

53

Organisation

On Behalf Of

Type of Consultee

Member of the public

MEDWAY COUNCIL ISSUES + OPTIONS CONSULTATION

QUESTION 7 - WHAT FORM OF HOUSING BEST MEETS THE NEEDS OF MEDWAY'S GROWING POPULATION OF OLDER PEOPLE

As with any age group, there should be a CHOICE of housing options for older people. A lack of supply of suitable property to buy is a key factor stopping people downsizing. So alongside starter homes for younger people, there should be greater provision of housing for older people. A typical downsizer wants a ^{low-maintenance} two-bedroom property with level or easy access / lifts, near shops, amenities and transport. Some people may look for a concierge service / emergency call service. Yet smaller bungalows and retirement flats often cost more due to competition due to poor supply. By increasing supply of suitable retirement housing to buy, this would free up 3/4 bedroom family homes. Supply could be increased, at no additional cost to the local authority by requiring provision in new developments (eg retirement apartments, using Lifetime Homes Standards,)

QUESTIONS 23 + 24 - TOURISM

- Promote increased tourism by joint: publicity, transport and ticketing - throughout Medway's sites, and Kentcc sites.
- The river and countryside, including the military landscapes of the Great Lines Heritage Park and Lower Lines Park are often overlooked. This could be addressed by walking leaflets, guided walks, interpretation signage, re-instate the Medway walking festival, greater river transport, riverside paths.

Name: Dr M.I Van Dooren

Reference

54

Organisation

On Behalf Of

Type of Consultee

Member of the public

Consultation Document: Cycling in the Medway Towns

This is a comment on section 25.9, p.97, of the Medway Council Local Plan 2016 (Consultation Document) concerning the rates of cycling to work.

On p.97 it is stated that these rates are well below national and regional levels and that this may be caused by high levels of commuting out but also by the infrastructure for cycling. In fact the two possible causes are interconnected, as a good infrastructure and other facilities for cycling may encourage those commuting out of the Medway Towns by train to cycle to the train stations.

In my opinion the main issue is the lack of sufficient facilities for cycling in the Medway Towns. Although some cycle routes are connected to the National Cycle Network it is very difficult to just cycle from A to B. As a resident of Gillingham I cycle several times a week between Upper and Lower Gillingham, Chatham and Rochester. Even on bigger roads with sufficient space there are hardly any proper cycle lanes. There are scattered stretches of road designated for cycling, but they are mainly very short and not connected into a proper route. As a cyclist you have to keep weaving on and off pavements and roads. Pedestrians expect you to be on the road and motorised traffic expects you to be on the pavements. If you try to follow the signs for cyclists, you find that your route is interrupted continuously. Being in what is supposed to be a cycle lane, after 100 yards or so it suddenly stops in the middle of nowhere. Often a cycling sign appears further down on the other side of a busy road with a barrier down the middle. Even if you dismount and manage to cross the road somewhere, you are likely to find that you have to go back to the other side within minutes.

Opposite Gun Wharf for example, a cycle lane suddenly appears, painted on the road (and lasting only till Fort Amherst). How are cyclists supposed to reach that bit of cycle lane? On the other side of the road, just in front of the Council Offices, the only option is to go over the pavement right through the bus stop. Between the petrol station and the Dockyard main gate is a usable bit of cycle lane, although the entrance to it is difficult to manage with the sign that has been planted in the middle of it and the surface is rather rough. In front of the Dockyard main gate this lane comes to a sudden end. Are cyclists supposed to dismount again, and walk round the subway entrance and over the pavement to reach the beautiful wide red bit of cycle lane (about 100 feet long...) beside the next bus stop? Or to come out onto the road, which is dangerous because of the cars and annoying for car drivers?

Also there is no point having a wide space in front of the cars at traffic lights where cyclists can wait for the lights to turn green if there is no cycle lane connected to it, either to get there or to carry on from there.

Round the Dockside Outlet Centre and St Mary's Island, some cycle lanes have been provided but they keep changing between red and black, are often for both directions, and are sometimes to the right and sometimes to the left of the pedestrian section.

The cycle lane on the A2 between Woodlands Road and First Avenue is also both directions, and not clearly separated from the pavement. So even though that bit is a proper cycle lane, towards Chatham you cycle against the flow of the traffic, and pedestrians and cyclists going in different directions get in each other's way. On the corner of Woodlands Road is the bottle neck between the barrier and the hedge where cyclists coming from both ways crash into each other as there is not enough space and you can't see each other coming round the bend.

There are many more examples that I can provide you with if you wish me to do so.

The question what measures should be considered to increase the rate of cycling in the Medway Towns (question 72 on p.98 of the Consultation Document) can therefore be answered quite easily.

We need cycle lanes that are designated for cyclists only, one way, on the left side of the road, separated from pavements, stretching long enough to provide a sufficiently connected route to cycle from one destination to another in the Medway Towns.

This is possible in Cambridge so it should also be possible in the Medway Towns.



Dr M.I. van Dooren, LL.M.



25 February 2016

Name: Diana Baker

Reference

55

Organisation

On Behalf Of

Type of Consultee

Member of the public

01634 715183

Ms Catherins Smith
Planning Manager - Policy
Housing and Regeneration
Medway Council
Civic Headquarters
Gun Wharf
Dock Road
CHATHAM
ME4 4TR

5th February 2016

Dear Ms Smith

Preparation of a new Medway Local Plan.
Notice of 'Issues and Options' Consultation.

Thank you for your recent letter concerning the above Consultation.

First of all I would like to stress that although I am Vice President of Dickens Country Protection Society, I have nothing to do with any decisions made by the Society and do not attend any meetings.

I spent an afternoon at the 'Hub' in Strood reading the new Local Plan which I found most interesting. I should stress that because of 'anno domini' I am most unlikely to see any of the changes/development which you propose! I would be more than happy to discuss contents with you and/or your committee either in your office or my home.

Needless to say I am more interested in the Hoo Peninsula area as it is nearest to me, however something which has 'arisen' in the last day is how people are staying in hospital for too long as there are no facilities for their care after operations and illness - in other words they need further care before returning home. May I suggest you give priority to a new hospital!!!!

I remember when the first suggestion of using the old Naval Hospital as the main hospittal. That is/was a historical building and was never appropriate in size or lay out. This IN NO WAY is 'knocking' present care.

Suggestion. Why not use the area of Chattenden Barracks as an area for medical care?

This could include a Designated Hospital.

A Nursing Home for after care following procedures in the hospital.

Accommodation for hospital staff.

Clinics for certain ailments.

Clinics for certain activities following treatment.

Pharmacy.

All of which would need Parking - plenty!

Chatham.

I have not been to Chatham since Military Road was no longer a road for public use. The consequence of which - not only for me - is that Chatham is not used as it was. I gather that the Pentagon does not have many shops and other shops have closed in the High Street.

Gillingham

I understand that the shops are not what are needed!

Rochester

I recently went along the High Street and all it is now is Restaurants and Charity Shops.

The Hoo Peninsula

This is an area near me, so know it reasonably well.

I started work at the Refinery in February 1953. My contract was from Sunday 1.2.1953 - the day of the floods and was not able to get to work until the Wednesday - I must admit I wondered what on earth I had done!

People don't seem to realise this was the original Garden of England - around the Stoke area as it provided London with its fruit and vegetables.

I notice Hoo has 'grown' quite a bit, as have other villages, the one thing missing is a decent Public Transport!! I believe children were left without transport to get to school. Your comment that villages on the 'other side' of Strood have the advantage of trains.

This letter is getting far too long! I really would like the opportunity to discuss things with 'someone'. Perhaps this could be arranged please.

Yours sincerely, Diana Barker (Mrs)



P.S. I would like the opportunity to discuss this with someone if possible, please

Name: M Jones

Reference

56

Organisation

On Behalf Of

Type of Consultee

Member of the public

REF: SLAA0833

19th Jan 2016

Dear MRS SMITH,

Thank you for your letter dated 14th Jan 2016. I have read with great interest the observations you have made regarding the possible development of part of my property.

I would again like to confirm to you that the purpose of my application is to obtain outline planning permission on the said parcel of land so that I can pass the land on to a suitable developer so the land can be developed in a suitable way for the advantage of the village.

I read with interest the section dealing with the Port Victoria road access to the proposed site. I would like to bring to your attention that when the SEAVIEW estate was developed in the 1970's, before I became the landowner, the plan was for the developer to extend the estate onto my land by using an access road between the properties No.5 and No.30 SEAVIEW. This however did not happen because the development ran into financial problems and the estate was not completed.

Thank you for your help in this matter and I hope you will look favourably on this application and I am available at all times if there are further questions to be asked

Yours faithfully
M Jones

Name: John Escott

Reference

57

Organisation

On Behalf Of

Type of Consultee

Developer/Consultant



Head of Planning Policy
Medway Council
Gun Wharf
Dock Road
Chatham ME4 4TR

26 February 2016

29 FEB 2016

OUR REF: JE/BH/14/105/FD

Dear Sirs,

**MEDWAY ISSUES & OPTIONS CONSULTATION – LAND AT 178 BROMPTON
FARM ROAD, STROOD**

I refer to your letter of the 20th January 2016 inviting the promoters of SLAA sites to assist in the updating of the SLAA and to provide responses in respect of the Issues and Options document.

Updates to the SLAA Assessment – 178 Brompton Farm Road, Strood

Facilities, Services & Public Transport Accessibility

The SLAA identifies the above site as scoring poorly in terms of its accessibility. The Council's assessment has been reviewed by my client's Highways & Transport Consultant. Their opinion is set out below;

Whilst the site may not be within the desirable 500m of a wide variety of facilities, the site is situated within a heavily built up residential area, approximately equidistant between a wide variety of facilities to the east and west of the site. Approximately 950m to west is a Tesco Express, whilst 1.5km to the east a wider variety of shops can be found, including a Co-Op, Fish and Chip shop and Pub. Strood town centre is also just 1.5km to the south of the site. Temple Mill Primary School is also located just south-east of the site, whilst Hilltop Primary School is just 1km away from the site and Gordon Junior School is just 1.3km away from the site.

1.5km could be walked in less than 20 minutes (@ 5kph walking speed), or cycled in just over 5 minutes (@ 15kph cycling speed), which is perfectly reasonable for the type of occupant which the development is likely to attract, young families. It appears that a number of important factors are not taken into account when calculating the Facilities and Services Accessibility Ratings, such as the quality of the walking and cycling routes to the nearest facilities. Being in a residential area already, the footways are of a good quality in all directions, with good pedestrian crossing points in sensible locations. Cycling facilities are also excellent, with a segregated cycleway/footway along the southern side of Brompton Farm Road.

In terms of public transport accessibility, bus stops are located well within 200m of the site access. Whilst they may not provide more than 1 hourly service throughout the day, during the peak hours there are up to 5 buses per hour. This is significant because this is when the majority of people are likely to need the bus. Again, this seems to be a shortcoming of the Accessibility Rating system, in that an average hourly service is calculated between 8am and 6pm, rather than accounting for peak demand times. Admittedly, Strood Railway Station is outside of the 800m assessment catchment for the Accessibility Rating. However, with it being just 1.4km away from the site, the Station could be reached in just 17 minutes on foot.

In summary, whilst the site does not meet the specific and, in our view, rather rigid assessment criteria for Facilities and Transport Accessibility within Medway Strategic Land Availability Assessment, it is still within a location where a high number of walking, cycling and public transport trips could be expected.

In addition to these comments, it also seems to me to be relevant to consider the site in the wider context that is provided by Site 0729. This site is regarded as having adequate access to facilities, services and public transport accessibility on the basis that the site has the potential to deliver an enhancement in the level of services and local facilities either through direct on site provision or through contributions to local off site facilities.

The proposals for the site include the provision of public open space which will also contribute to the facilities in the area.

The latter would certainly also seem possible in respect of the site at 178 Brompton Farm Road (Site 1042).

Site Access

The proposed access onto Brompton Farm Road has been designed to comply with all highway standards. A pre-application consultation with the Council has indicated that there would be no highway objections. A Transport Assessment that has now been prepared confirms this to be the case. A copy of the TA will be submitted with the forthcoming application for residential development of the site.

Ecology

An Ecological Assessment/Reptile Survey has been undertaken in respect of the site. A copy of the Assessment will be included in the forthcoming planning application regarding the site. The Assessment does not identify any overriding ecological constraints.

Landscape

A Landscape & Visual Impact Assessment has been undertaken for the site. The report concludes that, with the implementation of a successful mitigation strategy, the overall impact of the scheme is considered to have a small overall effect on the surrounding landscape

character and visual impact. The development would not be out of character within the receiving landscape. A copy of the LVIA will be submitted with the forthcoming application.

Agricultural Land

An Agricultural Land Classification & Soil Resources Analysis has been undertaken. The site comprises Grade 2 agricultural land. The report has previously been submitted to the Council. A further copy will be contained in the forthcoming planning application.

Noise

An Acoustic Assessment has been carried out which demonstrates that residential development on the site would not suffer an unacceptable acoustic climate. Noise impacts from the adjacent A289 can appropriately be mitigated. A copy of the Noise Assessment will accompany the forthcoming planning application.

Residential Amenity

A Masterplan Layout has been prepared for the site which incorporates a sizeable area of new public open space between the proposed housing development and the rear of existing properties in Brompton Farm Road. The scheme design would ensure that there would be no adverse impact on the living conditions of nearby residents.

Overall Conclusions

It will be demonstrated through the development management process that a suitable, high quality residential development can be delivered on this site within the next five years. The only determinative judgements to be made will be whether, in the light of its current Green Belt designation, there are very special circumstances that would clearly outweigh the harm to the Green Belt by reason of inappropriateness and any other harm, as well as a judgement on the balance between providing much needed new housing and the retention of Grade 2 agricultural land. Of course, if the Council undertakes a Green Belt review and concludes that a new, sound and defensible Green Belt boundary should be established in order to enable an incremental extension to the northern part of Strood, then the Green Belt policy issue falls away.

Medway Issues and Options

These comments are directed towards the 'DEVELOPMENT STRATEGY' section of the document. The Development Strategy sets out a thoughtful and considered range of options regarding how future development needs for Medway should be met. Clearly, the most sustainable approach and that which is most likely to regenerate the existing urban areas of Medway is higher density town centre and riverside development. However, as is recognised, this is unlikely to meet the development needs of family and other wider sections



of the community. The strategy, in my client's view, needs to blend the continuing regeneration of the large scale development sites in and around Rochester and Strood with incremental suburban development which would provide the most sustainable option in terms of meeting the needs of families.

It is important also to recognise the short term need that exists. As the document notes, expansion of existing suburban areas will provide the best opportunity for meeting these housing needs in the short term.

My client's view, therefore, is that there is a clear and obvious justification for reviewing Green Belt boundaries as part of the preparation of the new Local Plan.

These comments are made specifically to address the questions posed within the Development Strategy and, as such, no specific answers are given to the specific questions.

Yours faithfully,

A large black rectangular box redacting the signature of John Escott.

John Escott

ROBINSON ESCOTT PLANNING

Email:

A black rectangular box redacting the email address.

Name: Patricia Parker

Reference

58

Organisation

On Behalf Of

Type of Consultee

Member of the public



28 FEB 2016

24th February 2016

Planning Policy Regeneration, Community & Culture
Medway Council, Gun Wharf
Dock Road, Chatham, Kent ME4 4TR

Dear Sir/Madam

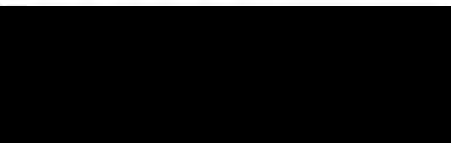
**Response to Medway Council Local Plan 2012 to 2035 - Issues and
Options Consultation Document**

I think that it is very important that all land currently designated as open space in the 2003 Medway Local Plan is retained and protected in the Medway Local Plan 2012 – 2035. This includes the former Temple School playing field which is situated to the rear of my property.

In addition, all major new housing developments should have an area of open space allocated at the planning stage.

The residents of Medway need open spaces for a variety of recreational activities and to help make their environment more pleasant and enjoyable as the number of houses increases significantly over the next few years.

Yours faithfully



Mrs Patricia Parker

Name: Ian Burt

Reference

59

Organisation

On Behalf Of

Type of Consultee

Member of the public

[REDACTED]

[REDACTED]

25th February 2016

Planning Policy Regeneration, Community & Culture
Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR

Local Plan- Issues and options

Unfortunately due to illness, bereavements and absences it is not possible to compile a central response from the Medway Countryside Forum so I have asked each affiliated body to make there own responses where appropriate.

The following views are my own and do not represent any groups concerns.

Throughout the documents there are repeated references to protecting nationally designated natural areas and increasing biodiversity. Lodge Hill development is specifically mentioned as being critical to the Plan and that the result of Call-In Inquiry will drive the Local Plan. As this Inquiry is now delayed into 2017 the result will be more ancillary than driving. If the inspector approves the application it will be many years before Ordnance is cleared and Compensatory lands brought into effective use before development can take place therefore it may be prudent not to rely on the allocations attached to this site.

As the reports show a considerable short fall in housing provision against assessed needs perhaps there must be a revision on Densities and heights to try to redress the balance in land available. If adequate provision can not be found now then the situation will only get worse post 2035.

Yours sincerely,

[REDACTED]

Ian Burt



Name: Vivienne Parker

Reference

60

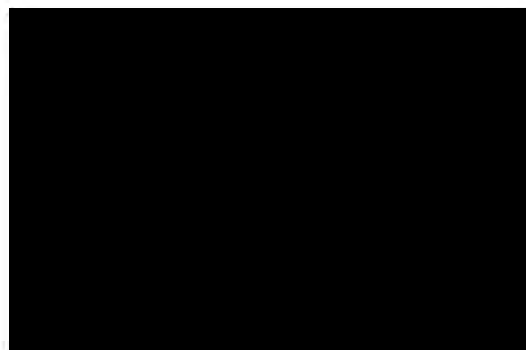
Organisation

On Behalf Of

Type of Consultee

Member of the public

From:



The Planning Department
Medway Council
Gun Wharf
CHATHAM Kent
ME4 4TR

19 February 2016

Dear Sirs

LOCAL PLAN SUBMISSION

I wish to make the following submission in relation to the Local Plan

- 1] I believe the strategic issues for the area should also include flood protection, climate change and adequate healthcare given an ageing population.
- 2] In response to the climate change threat I believe the Council should consider moving their offices from the Gun Wharf as the ground floor fronting onto the Medway will eventually flood.
- 3] In relation to housing needs, I note there is no allocation here for new Council housing or social housing for rent. The assumption is that all housing will be for people to buy. This will only increase the private rented sector which could lead to all sorts of other problems such as more people than today living on the streets but who are actually working because they cannot afford a roof over their heads. It leads to people being forced to move house every 6 months because they are occupying under a short hold tenancy agreement which will allow them little time to register with a GP, get their children into a local school or get them onto the electoral register thus creating a climate of poor health and social disengagement. There should be more Council housing based around an occupancy of at least 2 years so as to create greater stability within our communities. There is also a lack of nursing home and EMI accommodation for the disabled elderly.
- 4] Because skills levels in Medway are so low, there is a tendency for employers to take on staff from outside the area and we need to encourage more apprenticeships. We also need to be rebuilding good careers guidance within our schools to direct young people to where there are skills shortages. I also note that the need for agricultural workers has been overlooked and as a result many farmers are considering selling their farms because they are approaching retirement. We need to be actively encouraging young people work in agriculture and horticulture locally and create apprenticeships in the sector.
- 5] In relation to tourism, the literature supplied by the Medway Tourist Office is poor and tends to focus on Rochester. We need to be encouraging people to go elsewhere in Medway and in particular to the surrounding countryside, country parks and villages. We need to be encouraging eco-tourism and in particular raise the possibility of cycling holidays on the peninsula. There is a need to draw up a leaflet relating to the great little open spaces of Medway. In relation to this, the ratio of open space per head of population should not in any way be reduced as already we have the

poorest ratio in the County. There is also no publicity relating to our 2 beaches are Allhallows and Grain and poor publicity advertising the free activities for our children in Rochester Castle, Upnor, the Guildhall Museum, our libraries and hopefully Eastgate House. Even local people don't appear to know what is available. Medway needs to be marketed as a child friendly holiday destination if we are to develop beyond being a destination for day trips.

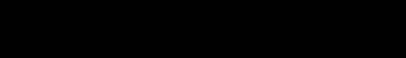
6] I do not believe that Chatham should be the highest order centre in Medway. People are now shopping closer to where they live and this should be viewed in a positive light as it will reduce journey lengths and hence air pollution and CO2 emissions. This should be viewed as a way to create a greener cleaner Medway. This will be particularly important for the elderly who increasingly will be unable to travel longer distances but will want to maintain some mobility and independence. No mention has been made to Dockside which has over time emerged as a major shopping centre - hardly surprising given that it is less than 10 minutes' drive from major areas of employment at the Medway City Estate with people driving through the tunnel and along the northern link road to Gillingham Pier. A lot of workers spend their lunch time and meet after work in Dockside and this should be further encouraged.

7] We need to improve the facilities on the Kingsnorth Industrial Estate. As a brown field site it would not be suitable for riverside housing because of the risk of flooding and we need to encourage more businesses to move there. There are also some historic buildings on site which should be renovated and put to business use. There is also a need to create more permanent employment on the Peninsula as at present a lot of people are only employed during the summer in agriculture and tourism.

8] There has been no mention of encouraging more families to install solar panels on the homes to help us achieve our CO2 reduction targets. This will be particularly important where houses are served by overhead low voltage power lines which are increasingly likely to be brought down as our climate becomes stormier. There is also no mention of other energy sources such as Archimedean screws to harness tidal energy in our local creeks or the London Array Wind Farm. The issue of waste heat from energy production was looked at when the new Kingsnorth Power Station was being planned but it was felt that any housing would be too far away to benefit. Which brings me to the glaring mistake at Paragraph 24.6 - there has been no replacement for Kingsnorth Power Station and no replacement is being planned. This mistake would suggest to any Inspector that this plan has not been properly updated since 2010.

I hope you will be able to take these proposals into account when drawing up the draft Local Plan.

Yours faithfully



Vivienne Parker

Name: Geoff Juby

Reference

61

Organisation

On Behalf Of

Type of Consultee

Member of the public

26 FEB 2016

26 FEB 2016

Mr D Harris,
Planning and Development
Medway Council
Gun Wharf,
Chatham,
ME4 4TR

24th February 2016,

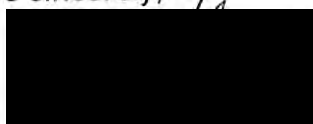
Dear Dave,

DRAFT LOCAL PLAN

Please find attached my comments on the draft local plan, which are mainly concerned with Gillingham South. These are private comments and not from the Liberal Democrats.

I also feel that you would need to consider issues raised in the Scott Wilson Report on the North Kent Marshes ecological study 2002 as they would still be relevant.

Yours sincerely,



Geoff Juby

FIRST DRAFT OF RECOMMENDATIONS FOR DRAFT LOCAL PLAN

By Geoff Juby

Rochester Airfield. In the event that this closes within the foreseeable future, this area should be used for the provision of a new Hospital to serve the current area served by the Medway Maritime Hospital. This has good transport links, ample parking space available and already has a helipad.

Gillingham South.

In the event that there should be any planned expansion of the Medway Maritime Hospital, there should be a complete review of the total area surrounding the hospital to improve transport access and increase the area available for parking.

The empty **Jubilee Clips** building and surrounding land, and the current **drop in health facility** operated by DMC in Canterbury Street. Should this land be made available for housing there should be a provision of at least two parking places for each residence up to two bedrooms, and three parking places above that. As Gillingham South is underprovided with urban green space and play areas, as well as community halls, this aspect of any development should take some priority.

The current **Jubilee Clips building in Canterbury Street** near to Byron Road School could make an infill residential site, providing that there is adequate parking provision. Also there should be a mix of housing to include some disabled accommodation and some larger family homes.

As many **public houses and privately owned clubs** may well close down over the next few years, there should be a review of these sites and provisional plans put in place for the future use of these sites. (The Westcourt Arms, Beacon Court and the Palm Cottage Club would appear to be the most vulnerable in the life of the plan)

Gillingham Football Club

Plans to move the club from its present site have come and gone over the past two decades. In the event that the club does happen to move within the life of the plan it would not be appropriate to allow buildings of above three stories on this site, and again some green space and play facilities should be provided, as well as a community hub of some kind to replace the current facilities provided by the Football Club.

St Barnabas Church

Provision of accommodation for disabled residents.

Every development above 20 units should include at least one purpose built unit suitable for wheelchairs. In the event that there is garden space available, instead of open green space there should be walkways large enough to turn a wheelchair in, and raised flower beds as well a high level storage for tools. This way disabled residents would live more within the community instead of being set apart.

Name: Sue Salter

Reference

62

Organisation

On Behalf Of

Type of Consultee

Member of the public

16 FEB 2016

15th February 2016

Concerning the Strategy for Medway 2023.

To the Planning Officer.

As a Medway Champion I received an appeal to present my thoughts and views as to the way forward for the Medway Towns. The following opinions and suggestions include those from several residents whom I spoke to, as well as my own.

HOUSING

- Concerns were universal concerning population growth and pressures on land to build ever more housing.
- I personally feel that developers must be made to pay more than lip service to creating housing for first time buyers.
- Brown field sites should always be utilised before expanding into green belt.

16 FEB 2016

② EMPLOYMENT

- Young people should be given increased opportunities to learn practical skills and get closer to the natural world. I would suggest the creation of a farm, either attached to a school (as has been established at Northfleet School for Girls) or as an adjunct to Mid-Kent College.
- Creating a 'Thanet Earth' in Medway - reducing the need for imports; actively engaging in the fight against global warming and providing much needed employment for college leavers.

③ ENVIRONMENT

- Retention of green spaces. (See studies on obesity & mental health)
- Encouraging church yards to maximise their surrounding land by planting wildlife-friendly bushes and trees.
- Providing more allotment sites and encouraging sustainability.

④ DISABILITY

- There is an urgent need for appropriate changing facilities for severely disabled adults. One resident reported that the only option was to use the public toilet floors when out with her adult son.

Name: Dr L E Lomas

Reference

63

Organisation

On Behalf Of

Type of Consultee

Member of the public



20th January 2016

Planning Policy Regeneration, Community & Culture
Medway Council, Gun Wharf
Dock Road, Chatham, Kent ME4 4TR

Dear Sir/Madam

**Response to Medway Council Local Plan 2012 to 2035 - Issues
and Options Consultation Document**

Please find below my response to the Medway Council Local Plan 2012 to 2035 - Issues and Options Consultation Document. I have only responded to a few of the issues and options by answering seven of the questions that have been posed.

Questions 2 and 3

The Document envisions substantial growth in population, housing, infrastructure and the economy in the Medway area. The plan for an extra 29,000 + dwellings in the period up to the year 2035 cannot possibly be met through the use of brownfield sites only but, in order to avoid overdevelopment in the Medway area and preserve its character and the environment, it is essential that Medway Council continues to make optimum use of this type of site so that greenfield sites are kept to the smallest possible proportion.

Question 15

It has been acknowledged in the Document that industrial, office and warehousing land use on the Medway City Estate (MCE) is of poor quality compared to usage on other industrial estates in Medway. Perhaps there could be wholesale redevelopment of the MCE to bring it up to at least the standard of these other estates. I understand land ownership is a particular problem with MCE but nevertheless there should still be some scope for an improvement in provision here.

R.T.O.

Question 16

I agree with the suggestion in the Document that there should be greater residential use of properties above shops in, for example, Chatham High Street and Military Road. This would increase footfall particularly in the evenings and would thereby increase the number of people making use of existing shops as well as probably leading to new businesses opening. More residential dwellings above the shops would enliven the area's high streets and generate greater income for existing and new businesses.

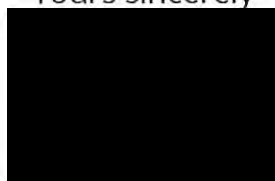
Questions 30 and 48

In order to protect the environment and help ensure that Medway is a pleasant place in which to live, it is important to retain the Metropolitan Green Belt. For the same reason, it is essential that land designated Open Space in the 2003 Local Plan is retained. This is particularly important because the Document states there is currently a shortfall in Open Space. When there is housing development on greenfield sites, an appropriate amount of Open Space should be provided as part of the development.

Question 54

If suitable land can be found, many advantages would accrue from Gillingham Football Club moving from their Priestfield ground. The club could share part of a sports complex so that the facilities would be much more intensively and widely used than they are than now. Their current ground is used roughly only every other Saturday for two thirds of the year. Also, in excess of 5,000 people coming to watch a game at Priestfield can be problematic for the club's neighbours because of the noise and congestion.

Yours sincerely

A black rectangular box redacting the signature of Dr L E Lomas.

Dr L E Lomas

Name: Rodger Dudding

Reference

64

Organisation

On Behalf Of

Type of Consultee

Business

Dudrich® (Holdings) Limited

Lonsto House

276 Chase Road

London N14 6HA

Tel: + 44 (0)20 8882 8575

Fax: + 44 (0)20 8886 6676

Email: enquiry@lockupgarages.co.uk

www.lockupgarages.co.uk



Our Ref. RD/kj/CS113643

Ms Catherine Smith – Planning Manager – Policy
Housing & Regeneration
MEDWAY COUNCIL - Civic Headquarters
GUN WHARF, Dock Road
CHATHAM
Kent ME4 4TR

January 7th 2016
Dictated January 6th

Dear Catherine

Re: Your letter January 4th / Preparation of a new Medway Local Plan

Thanks for your circular letter and the advice contained therein and, germane or not, seems like 150 years (sic) ago I was resident in Wigmore, Gillingham, Kent but relocated to North London some 55 years ago – so I do have an interest in the Medway Towns!

The Company at letter heading is but one within my private group of companies, and we carry out small-scale developments in numerous areas and currently have under construction Four 3-bedroom Houses, all with off-road parking bays and gardens situated at what is presently (land at) 49-57 Trinity Road, Gillingham, Kent ME7 1JA, covered by our Folio 1075.

This new development is well underway and with a fair wind, ready for sale / occupation on or about June 2016. The purpose of this letter is to enquire that does Medway Council take a short-term lease on privately owned property for rental purposes and to add to their housing stock availability?

You no doubt are familiar with that scheme, whether or not Medway operates similar to London boroughs, we seek your advice as we may well be of a mind to enter into such an agreement (STC), as an alternative to selling outright. We have many such agreements with London boroughs and seek your advice on this one.

As we believe in transparency, also make mention of the fact that another group company, being Dudrich (Holdings) Limited, acts as the in-house management agent for various other legal entities we own and are the owners of the largest number of lock up garage sites in the UK, which is well in excess of 1,000, comprising well over 14,000 lock up garages, which, generally, we hold for long-term investment purposes but periodically, like with Trinity Road, and circumstances dictate, apply for planning permission for residential redevelopment and follow that course.

Years back, when Medway sold a large number of their lock up garages sites, we were the purchaser from recollection of some 19 sites out of 20, which went to public auction, some of which have been redeveloped but the majority are held in the investment programme.

If Medway still retain lock up garages, STC, we are in the market to buy and perhaps you will let us know what is Medway's current policy.

At a conservative estimate and on valuations taken three years back, we have circa £150 million invested in lock up garages so you can see we are very serious players!

Look forward to hearing from you and remain,

Rodger Dudding
Managing Director

Our Company Website addresses/emails are as follows:

www.lockupgarages.co.uk	:	enquiry@lockupgarages.co.uk
www.lonsto.co.uk	:	enquiry@lonsto.co.uk
www.studio434.co.uk	:	enquiry@studio434.co.uk

Call the Specialists We Rent - We Buy - We Sell Lock-Up Garages

0203 255 0500 125, Dudding, Lockup Ltd, 276 Chase Road London N14 6HA

Name: Parham Medway Ltd

Reference

65

Organisation

On Behalf Of

Type of Consultee

Business

Parham (Medway) Ltd

173 Pier Road, Gillingham, Kent. ME7 1UB
tel.: 01634 280088 email: office@parham.org.uk

22 FEB 2016

Your Ref.

Our Ref.

LFP/PSH/G71

19th February 2016

Planning Policy.Regeneration.Community & Culture,
Medway Council,
Gun Wharf,
Dock Road,
Chatham,
Kent, ME4 4TR.

Dear Sirs,

Re: Medway Towns Local Plan 2016 – Reed Court , Strood

We note with interest your Council is preparing a new local plan to set out a strategy for Medway's' development up to 2035 and would ask you to consider the inclusion of the above Site shown on our Site Plan 40/44 and enclose our write up in respect of Regulation 18 Issues and Options Consultation.

Yours faithfully,
For Parham (Medway) Ltd

L F Parham
Director.

Medway Council New Local Plan 2016
Parham (Medway) Ltd Land at Rede Court Strood
Green Belt Designation

We note the policy purpose of the Green Belt as set out in Section 9 of the Government's National Planning Policy Framework (NPPF), notably its five purposes indicated in paragraph 80 and (inter alia) that Green Belt boundaries should only be altered in exceptional circumstances through the preparation and review of the Local Plan, and that boundaries should be defined clearly using physical features which are readily recognised and likely to be permanent.

The issue here is whether the location of this land is necessary for the purposes of the Green Belt as set out in the NPPF. Applying these to this area it is clear that its strategic role is to prevent the further extension of the built-up areas of Kent Thames-side at Gravesend and the Medway Towns at Strood, in order to prevent them from merging and safeguarding the intervening countryside from their encroachment. A more local function is to prevent the urban area of Strood from encroaching on the village of Higham by maintaining a viable wedge of Green Belt between them. We support these functions of the Green Belt here, but do not regard this site as necessary to maintain them, in view of its topographic position to other areas of Green Belt in the area.

The site slopes gently upwards from its boundary with the existing built-up area to its north-west boundary which forms a low ridge. This is marked by a partially complete row of mature trees which largely screen the land from the open farmland to the north; this gradually descends towards the A228 dual carriageway, beyond which the topography rises to the village of Higham. Infilling of the small gaps in the row of trees would complete an effective screening of the land when viewed from the nearest, Gadshill, part of Higham. The topography, in terms of levels and landscape features, are important in assessing the relative value of this land to the Green Belt. Moreover, the site's boundary and physical features are such that it would not create a precedent for further relaxation of the Green Belt in the vicinity.

The NPPF requires Local Plans to positively seek opportunities to meet the objectively assessed needs of the area, with sufficient flexibility to adapt to rapid change (paragraph 14). Section 6 of the NPPF (covering housing) indicates that Local Plans should, to meet the assessed needs for market and affordable housing in its housing market area, identify key sites which are critical to the delivery of its housing strategy over the plan period, and to produce a supply of specific, deliverable sites sufficient to provide five years' worth of housing against their overall housing requirement.

Medway Council Local Plan 2016
Issues & Options Reply by Parham (Medway) Ltd

We submit our 16.265 hectares site as Reed Court, Strood, as shown on drawing 4/44 for inclusion in your local plan for development in 2018/2023 (your first five year need). This is an extension to our original development adjoining Reed Court Road. No infrastructure is required, all road connections, sewer, electricity, gas, water services available at the boundary.

All we need is the 'Green Belt' designation removed, see attached Green Belt description.

Once we know the 'Green Belt' designation will be removed, a detailed layout can be provided either following the existing development providing larger family houses that Medway needs (27-19 & 20) with 25% affordable houses in the north east corner providing 290 houses in all. Alternatively, a high density development of 590 homes could be provided both with a village shopping area.

Trusting you are able to remove the Green Belt designation and include this Site in your local plan.

We make the following response to your questionnaire:

Question 80 – Development Principles – We agree with these, the high quality of life in housing and development is paramount and is readily provided in well planned incremental suburban development.

Question 81 & 82 – Lodge Hill needs to be put in context; if it goes ahead, it should only provide for 17% of the overall scale of housing growth, meaning that 83% would need to be met elsewhere.

Question 84 – Green Belt – We note with satisfaction paragraph 27.17 and 20 that this is under consideration. We attach a separate statement of our case for the release of our land at Reed Court, Strood from the Green Belt and its allocation for housing development.

This site is capable of early development and would contribute to meeting the need to demonstrate availability for the first five years of the Local Plan. Access, Infrastructure and Services are available from the boundary of the site with adjoining development.

Parham (Medway) Ltd

Name: John Lister

Reference

66

Organisation

Natural England

On Behalf Of

Type of Consultee

Government/Public Body

[REDACTED]

From: [REDACTED]
Sent: 29 February 2016 10:33
To: policy, planning
Cc: [REDACTED]
Subject: 175388 - Medway Local Plan Issues and Options – Jan 2016
Attachments: NE Feedback Form 2015.pdf; ATT00001.txt

Follow Up Flag: Follow up
Flag Status: Completed

Dear Planning Team

Thank you for consulting Natural England on your Issues and Options document. My comments are as follows:

- We note (in para 1.2) that *"The document does not set out detailed policies or identify specific sites for development. Rather, it presents key contextual matters that will be the drivers for the new Local Plan"*. We look forward to early informal dialogue about policies and allocations that are likely to have a significant effect on designated habitats and landscapes.
- Question 1 - The vision should pick up on the commitment to "protecting the natural environment" (Para 5.3, Bullet 3), informed by the government's ambition for sustainable development which includes (inter alia):
 - *To address the connections between people and places and the integration of new development into the natural, built and historic environment - Para 61*
 - *To conserve and enhance biodiversity - protecting irreplaceable habitats – Para 118*
 - *To plan for biodiversity at a landscape-scale in the context of local ecological networks, and across local authority boundaries and with Nature Improvement Areas – Para 117*
 - *To minimise impacts on biodiversity and provide net gains in biodiversity where possible, to halt the overall decline in biodiversity, by establishing coherent, resilient ecological networks - Para 109*
 - *To maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, ... and improve public access to and enjoyment of the coast - Para 114*
 - *To recognise the intrinsic character and beauty of the countryside - Para 17*
 - *To define Green Infrastructure, a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities – NPPF Annex*
 - *To conserve landscape and scenic beauty in Areas of Outstanding Natural Beauty and their wildlife and cultural heritage - Paras 115 & 116*
 - *To protect and enhance valued landscapes, geological conservation interests and soils - Para 109*
- We welcome your commitments in para 6.7, particularly that *"The council recognises the importance of working at a landscape scale when planning for the natural environment. It works with the Kent and Thames Gateway Nature Partnerships. This collaborative working established a Nature Improvement Area that included investments in habitats on the Hoo Peninsula, and seeks to deliver the targets of the Kent Biodiversity Strategy through cross boundary biodiversity opportunity areas in the marshes and downs. The North Kent Environmental Planning Group has developed a strategic access mitigation and management strategy to address the potential of recreational disturbance to the special features of the Thames, Medway and Swale Special Protection Areas and Ramsar sites. The Thames Estuary 2100 Plan provides a framework for tidal flood risk management in Medway, and the proposals will be built into the Local Plan to ensure safeguarding of land and policy development. The council also works for the conservation and enhancement of the Kent Downs Area of Outstanding Natural Beauty through its management plan and role in the Joint Advisory Board.*

- Question 2 & 3 (Strategic Issues). Most of the issues relating to the natural environment have been flagged in your document or will become clear through the work on the plan.
- Questions 4 to 14 are mainly around housing matters and Questions 15 to 21 relate to employment. These generally lie beyond our remit and we have no comments, except to note that, in seeking allocations, consideration should be given to:
 - potential impact (direct, indirect and cumulative) on the nationally important designated landscapes (Kent Downs AONB) and habitats (SSSIs & NNRs) and on internationally important designated habitats (SPAs, SACs and Ramsar sites)
 - our Impact Risk Zones (IRZs) which are available on magic.gov.uk or can be downloaded
 - impact on local nature sites, BAP habitats, habitat networks (including components such as hedgerows, water courses natural ponds etc), areas known or expected to support protected species, species of principal importance and the quality of agricultural land.
- Questions 22 to 24 (Tourism) and 25 to 29 (Retail) generally lie beyond our remit so we have no comments.
- Para 11.2 mentions MCZ – further information is available in various documents available on www.gov.uk/government/publications and searching on marine conservation zone.
- Para 11.3 – Has the value of the setting of the Kent Downs AONB been broadly defined and recognised?
- Para 11.4 & 5 – the recognition of the area's distinct sense of place and the wide range of landscape types (beyond the AONB) is welcomed, along with the commitment to use of LCA (and presumably of LVIA) to test development proposals where appropriate.
- Para 11.7 - we welcome reference to the coastal path. Work is currently starting on the Medway section of the path and greater detail may be available for inclusion in the Plan, as it progresses. I understand that a dialogue on the project is in hand between your colleagues and mine.
- Para 11.8 - Consideration of ecosystem services will assist an understanding of the value of key habitats and features, and inform decisions about allocations, development briefs and the GI strategy.
- Para 11.9 – We are pleased to hear that *"the council has commissioned a Green Infrastructure Planning Project to analyse the principle components of Medway's environmental networks. This will help inform the planning process in determining the most sustainable locations for future growth, and securing multi-functional and high quality green infrastructure in new development"*.
- Para 11.10 – We note that *"There are some 'gaps' in the public rights of way network. In particular, greater access to the river would not only take advantage of Medway's central feature"*. Natural England's work on the coastal path, will involve partnership with the Council and others, and will help to address some aspects of the deficit.
- Para 11.12, second sentence – indicates that *"Planning policy and legislation provide strong protection against inappropriate development of the most important designated sites"*. The words "either directly or indirectly having a significant effect on" should replace the word "of".
- Question 30 (means to secure and strengthen Medway's environment). This would be best achieved through development that responds positively to the natural environment, including landscape character, habitats and associated networks, and the species they support.
- Question 31 (connectivity for wildlife and people). The mapping implicit in the response to Q30 above (including the mapping required by NPPF) and the other work needed to prepare a GI Strategy should provide a sound basis for delivering "connectivity".
- Question 32 – (the role of landscape). NPPF Para 17 indicates the need to recognise the intrinsic character and beauty of the countryside. This may be identified in existing Landscape Character Assessment and may be informed by Natural England's NCAs (<http://publications.naturalengland.org.uk/category/587130>). This provides a basis for understanding where development may be accommodated, and what nature and scale of development is possible. These conclusions can be tested through the use of tools such as LVIA.
- Questions 33 to 37 relate to the built environment and generally lie beyond our remit. Our only comments relate to the opportunity to improve urban areas through the inclusion of accessible natural green space and GI to ensure

development is sustainable in terms of provision for health and wellbeing, and provide landscape and habitat corridors for people and wildlife.

- Questions 38 to 48 relate to the services and infrastructure, and the issues generally lie beyond our remit. The comments above on greening, have relevance to Q43 to 46
- Para 16.1 should make reference to the value of green corridors for sustainable travel, exercise and opportunities for the movement of wildlife, inter alia.
- No comments on Questions 49 to 53. The overall level of provision is a matter for the LPA, albeit that the need and opportunities for GI should inform detailed design and may present opportunities for higher levels of provision.
- Questions 54 and 55 deal with Sports facilities. No comment.
- Question 57 – this matter is beyond our remit. However, section 19 mainly deals with Air Quality (AQ) in respect of urban areas and impact on those communities. It is important to review the conclusions of previous work on the HRA (around 2011) and consider indirect impact on N2K sites that are sensitive to AQ changes, and the loads that may occur from road within 200m of them, that will carry additional traffic arising from development. See the Air Pollution Information System (APIS) website for data. Any proposals for facilities such as power stations need to be closely considered in view of their potential impacts on air quality across a wider area and associated communities and habitats.
- Questions 58 to 60 – relate to M&W. We have no comments at this stage and assume that the selection of any sites will be subject to proper consideration through the HRA and the SEA processes, will involve the consideration of alternatives and that we will be consulted.
- Para 22.8 – some of the statements in NPPF that define sustainable development in respect of the natural environment are included above. See Question 1.
- Questions 61 to 65 generally fall beyond our remit. Clearly sustainable development should be delivered through consideration of the guidance provided by NPPF. In respect of questions 63 and 64, it would be helpful to outline expectations of the nature and scale of changes associated with climate change on settlements and the natural environment
- Para 23.5 (Flood Risk). We welcome your involvement in the South East Coastal Group, and the two Shoreline Management Plans relevant to the Medway Council and the reflection of the results in the Issues and Options document.
- Questions 68 and 69 relate to sustainable energy. The designation of any sites or zones should come from an assessment of potential and opportunities. The results should be tested against a range of criteria relating to the landscape, habitats and wildlife, inter alia.
- The issues raised in Question 70 are beyond our remit.
- Questions 71 to 75 relate to transport and are beyond our remit.
- Any changes to the scale of activity at Rochester and Stoke Airports will need careful consideration in respect of a broad range of factors, including issues for the natural environment, such as the tranquillity of the Kent Downs AONB and disturbance to birds, inter alia.
- Para 26.11 – the issue of costs and viability are clearly important. However failure to fund elements of proposals may mean development is not sustainable in terms of NPPF.
- Questions 76 to 79 (deliverability) generally fall beyond our remit.
- Given the pressures on the natural environment (urbanisation and development, economic and recreational pressures, climate change etc), consideration should be given the “protect and enhance” in para 27.3 rather than just “protect”. As a result, some reference to GI would also be helpful.
- Lodge Hill (para 27.5 to 27.7). We welcome the approach outlined. It is important that the site options are evaluated objectively using consistent criteria and methods.
- Para 27.9 to 27.34 (patterns of residential development). The “alternatives” set out in this section may prove to be the complementary components, all of which may be needed to deliver sustainable development. In most cases,

successful development will need a good design framework to ensure high quality of built design and inclusion of appropriate landscape, open space and habitats.

- It would be helpful to have some clarity in the plan regarding the brief for Garden villages.
- Questions 80 to 87 (Development Strategy). These matters generally lie beyond our remit. Apart from the points raised above, we have no further comments.

There is currently significant pressure from consultations on land-use proposals and appeals, the completion of local plans, the review of existing plans, and work on neighbourhood plans (there are over 500 parishes in Kent and Sussex). This makes it difficult to devote the time that consultations deserve. Nevertheless, I hope you find these comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

If you wish to comment on the service provided by Natural England, please use the appended form.

Yours sincerely

John Lister

Lead Adviser
Sussex & Kent Area Team (Area 14)

Natural England,
International House,
Dover Place, Ashford,
Kent, TN23 1HU.



www.gov.uk/natural-england

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Please send all new consultations to consultations@naturalengland.org.uk.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

Follow us: A row of social media icons including Twitter, Facebook, LinkedIn, YouTube, and RSS. The YouTube and RSS icons are highlighted with a red 'X' inside a square box.

Name: Rob Sanderson

Reference

67

Organisation

Defence Infrastructure Organisation

On Behalf Of

Type of Consultee

Government/Public Body



MINISTRY OF DEFENCE

Defence Infrastructure Organisation

Planning Policy Regeneration,
Community & Culture,
Medway Council,
Gun Wharf,
Dock Road,
Chatham,
Kent.
ME4 4TR.

Rob Sanderson
Senior Town Planner
Safety Environment & Engineering
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Tel: [REDACTED] Tel (MOD): [REDACTED]
Fax: [REDACTED] Mob: [REDACTED]
E-mail: [REDACTED]

www.mod.uk/DIO

26/02/2016

Dear Sir / Madam,

Medway Council Local Plan: Issues & Options 2012-2035 Consultation Document

As you may be aware, the Defence Infrastructure Organisation, (DIO), manages the Defence estate on behalf of the Ministry of Defence, (MOD). While the amount of land occupied by MOD in Medway has fallen from historic levels, it nonetheless continues to occupy significant areas of land and makes a useful contribution to the local economy, both as a local employer and through expenditure by Service personnel based in the area. DIO therefore welcomes this opportunity to make representations on the emerging Local Plan.

Please note that Bilfinger GVA have submitted separate representations to the Plan on behalf of DIO with specific regard to the Lodge Hill site, which is seen as a unique development opportunity in Medway. These representations are intended to be complementary to those and reflect MOD's wider ownership in Medway. (The numbering corresponds to the questions in the Local Plan Issues & Options Consultation Document).

Vision

- 1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035 ?

DIO believes that the following themes should form key components of the Vision:

- The continuing regeneration of the existing urban area;
- The reuse of brownfield sites in sustainable locations for appropriate purposes;
- Meeting the full objectively assessed housing needs of the area.

Housing

- 6 Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing ?

DIO supports the proposed level of affordable housing and also the threshold for providing it, as – from the SHENA - it appears to reflect the viability of development within the area.

Built Environment

- 33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration ?

The degree of protection afforded to any particular heritage asset should be proportionate to its significance. However, it is important that viable uses are found for heritage assets, in order to ensure their continued maintenance: this may require a degree of flexibility on behalf of the LPA in considering proposed changes of use and other development proposals.

Open Space

- 49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate ?

- 52) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches ?

While recognising the existing shortfalls of open space, the Council needs to be able to maintain the network adequately and also enhance it where necessary, to meet emerging needs. DIO therefore believes that some rationalisation may be appropriate – particularly where existing open space is not well suited to meet demands placed on it and could be usefully used for other purposes. With regard to new development, DIO believes that the Council should seek to achieve a balance of the two approaches: where practicable, and particularly in larger developments, appropriate levels of open space should be provided on site, if the proposed open space would perform a useful function, but where that is not possible (or desirable), financial contributions should be sought towards improving the existing estate.

Development Strategy

- 80) Are the development principles right ? Should other guiding principles be introduced ?

DIO supports the Development Principles as set out but suggest that quality of design should also feature.

- 82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway ?

A combination of development types is supported. DIO supports the 'High-density town centre and riverside development' option as the preferred type of development on the basis of its high sustainability, but recognises that this is unlikely to be able to fully accommodate all of the growth envisaged for Medway over the Plan period and is also unlikely to be suitable for some type of development. Consequently, the 'free-standing

settlements' option is also supported, to provide variety, achieve the level of development required and provide the necessary supporting facilities.

- 85) What provision should be made for mixed use in residential development, both high density and lower density ?

For residential developments, the priority should be to ensure that sites are located in sustainable locations in order to ensure access to services, rather than necessarily including a mix of uses within each site. However, depending on the size of the development and the level of service provision in the surrounding area, there may be opportunities to provide services to meet the needs of future residents and, possibly, the adjacent area.

Please do not hesitate to contact me if you have any questions regarding the above.

Rob Sanderson,
Senior Town Planner

Name: Sarah Lee

Reference

68

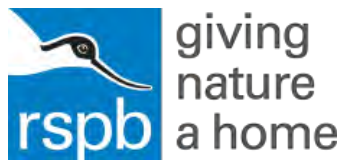
Organisation

RSPB

On Behalf Of

Type of Consultee

Government/Public Body



Planning Policy
Regeneration Community & Culture
Medway Council
Gun Dock Wharf
Chatham ME4 4TR

Planning.policy@medway.gov.uk

29th February 2016

Dear Ms Smith,

Medway Council Local Plan – Consultation on Issues and Options 2012-2035

The RSPB is grateful for the opportunity to take part in the first stage of the preparation of Medway's new Local Plan for the period 2012-2035, the Issues and Options Consultation ("the Consultation"). Whilst we appreciate that at this stage in the plan making process there are no fully formulated proposals to respond to as those will not be produced until the next round of consultation, there are some matters raised in the Council's Issues and Options document and supporting evidence that are of considerable interest to the RSPB and how proposals will be formulated in light of them. We have therefore provided our comments on both the Issues and Options document and that supporting evidence.

Please note that some of our comments concern several points, and therefore do not fit within the specific Consultation questions. In addition we do not have comments on all the issues the Council are raising. Therefore we are responding by letter rather than using the on line form but have highlighted the specific consultation sections we are responding to where possible.

The RSPB Reserves and Futurescape work

The RSPB has a direct interest in the Local Plan due to its reserves at Cliffe Pools, Northward Hill and Nor Marsh and Motney Hill. It is therefore a substantial landowner and land manager in the Council's area. At this early stage in the plan-making process, there is no evidence that these reserves will be affected by the Council's proposals, but we would welcome continued consideration of those reserves as more firm proposals emerge.

Please also note that we are fully engaged in the Greater Thames Futurescape (as set out in para 11.8 of the Consultation). The North Kent Marshes are the most important area for breeding waders in South East England, and a priority for our work. Therefore we are advocating a landscape scale approach to nature conservation (following the 'more, bigger, better and joined up' approach advocated by the Lawton Report 'Making Space for Nature' (2010)). In partnership with Statutory and voluntary bodies and private landowners, we are hoping to secure integrated management of wet grassland along the northern edge of the Hoo Peninsula.

Protected Sites

As you are aware the principal objective of the RSPB is the conservation of wild birds and their habitats. The RSPB therefore attaches great importance to all international, EU and national law, policy and guidance that assist in the attainment of this objective and plays an active role in the

domestic processes by which development plans and proposals are scrutinised and considered. Part of this involvement is working hard to ensure there are no adverse effects on International, European and national nature conservation protected sites and their species so that the sites and species can be maintained and where necessary restored to favourable conservation status.

A substantial part of the Council's area is adjacent to the Thames and Medway estuaries that are designated as Special Protection Areas (the Thames Estuary and Marshes SPA and the Medway Estuary and Marshes SPA). There are other important designated areas such as the Ramsar sites (Thames Estuary and Marshes Ramsar site and the Medway Estuary and Marshes Ramsar site), the Special Area of Conservation (North Downs Woodland SAC), the Marine Conservation Zone (Medway Estuary MCZ) as well as Sites of Special Scientific Interest, in and around the borough. The protection surrounding these protected sites and species are discussed in more detail in the annex attached to this letter.

The RSPB does not question the need to provide housing and employment opportunities in Medway. However the RSPB wishes to highlight the legal duties set out below and urges consideration to be taken of these requirements early in the plan making process.

Understandably the RSPB regards protection and restoration of the Thames Estuary and Marshes SPA and Medway Estuary and Marshes SPA, its species and its underpinning SSSIs, as well as all environmental protection policy, as a high priority in its work in the South-East of England.

For example the protection of European Sites from recreational pressures (in particular those associated with new housing) is a complex and evolving area in which the RSPB has taken an active role in both evidence base collation/interpretation and policy development at a regional and local level. It is welcomed that the Consultation highlights this issue at paragraph 11.11:

"There can be tensions between opening up access to the countryside and the needs of wildlife. Research¹ has shown that the internationally important birdlife of the SPAs can be damaged by the impact of people visiting the estuary. Dogs exercising off the lead, cycling and watersports are among the activities shown to cause disturbance to birds. These impacts could be a contributing factor to the decline of birdlife in the estuary. Action is therefore needed to address this potential damage, through avoiding inappropriate development, and land management, wardening and education interventions."

And although the RSPB very much welcomes Medway's commitments to –

"...implement future strategic recreational disturbance mitigation in respect of any impacts on the SPA" (paragraphs 6.7 and 26.8, the Consultation)

and the work being carried out with neighbouring authorities through the North Kent Environmental Planning Group to develop *a strategic access mitigation and management strategy to address the potential of recreational disturbance to the special features of the Thames, Medway and Swale Special Protection Areas and Ramsar sites* (para 6.7 Consultation), until we see that strategy and without any further details at this stage of exactly what action will be taken it is hard to comment further. Due to our previous involvement in these areas generally and this strategy specifically, we would welcome continuing to be involved and to discuss these issues with you.

¹ Liley, D. & Underhill-Day, J. (2013). Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology.

However an Appropriate Assessment (AA) of the Local Plan will be required, due to the likelihood of effects on the Ramsar sites, Special Protection Areas and SAC resulting from development proposed within the Consultation. We would recommend that evidence gathered is checked against these development proposals at an early stage so that consideration can be given to moving development away from these protected sites and/or a robust mitigation strategy for the Local Plan can be developed, to inform the AA.

The RSPB also welcomes the Council's work on Green Infrastructure (as set out in para 11.9, the Consultation) and its commissioning a Green Infrastructure Planning Project to analyse the principle components of Medway's environmental networks, to help inform the planning process in determining the most sustainable locations for future growth, and securing multi-functional and high quality green infrastructure in new development. As outlined above this should be linked to further studies on existing pressures on protected sites and potential increase in pressures.

Housing

The RSPB welcomes the Council's commitment as set out in para 7.10 the Consultation:

"7.10 In preparing the new Local Plan, the council is committed to planning positively to meet the development needs of its area, subject to ensuring that in doing so, development would not conflict with the principles of sustainable development set out in the NPPF. Therefore the council is embarking on the plan preparation process with the intention of meeting the objectively assessed needs identified for Medway's administrative area."

And that it is *seeking to make the best use of brownfield land* as set out in paragraph 7.20, the Consultation.

The RSPB has considered the information available in the Council's Strategic Land Availability Assessment (SLAA). We have noted issues with the Council's approach that we are concerned would substantially undermine the soundness of the future Local Plan.

The Council envisages that the population of Medway will increase by nearly 50,000 people by 2035 (the Consultation document, para 3.6) and the North Kent Strategic Housing and Economic Needs Assessment (SHENA) identifies the need for 29,463 new homes by 2035 (para 7.8).

Delivery of such a large number of houses within this period will require a very positive approach by the Council. We note that the Strategic Housing Market Assessment (SHMA) has translated this into an Objectively Assessed Need (OAN) of between 1,213 and 1,281 dwellings per year. However, there appears to be a mismatch between the number of dwellings envisaged and the timeframe of the Plan - at 1,281 dwellings per year it would take 23 years to deliver these dwellings, which takes the delivery to 2039 rather than the 2035 envisaged in the Consultation document. This should be a source of concern for the Council.

The RSPB also notes that the SLAA considers a total of 9,391 potential "Suitable and Available" SLAA Sites. This is significantly lower than the 29,463 houses that the Council has indicated will be needed and is therefore a serious source of concern in relation to the overall deliverability of the Plan. Even if the 1,723 units with extant permission are included, the Council only has a total of 11,114 units against this target (less than 38%). This does not sit well against the required need for a positive approach by the Council. It is important to note that the development proposals at Lodge Hill represent 45% of the 11,114 units. If it is removed from the calculations (to reflect the uncertainty around this allocation) then the Council can only demonstrate 6,114 units (or just under 21%). This is discussed in more detail below.

The Lodge Hill site allocation

The RSPB notes the Council's acknowledgement of the uncertainty around the Lodge Hill application (paragraphs 27.5 – 27.7, the Consultation). At the time of writing the precise timetable for the "called in" public inquiry is not confirmed, however the inquiry is not likely to take place before the spring of 2017. We note that this is after the date set in the updated Local Development Scheme for the consultation on Preferred Options due in January-February 2017.

In light of our previous Local Plan concerns about the lack of consideration of alternatives to the Lodge Hill application, the RSPB welcomes the Council's commitment to now consider alternatives to Lodge Hill, both other free-standing settlements as well as locations for dispersed housing. It welcomes the range included of proposals for accommodating housing growth in the Council's area (paragraphs 27.11 et seq the Consultation).

However, the RSPB wishes to underline that any preferred options for residential development provided through a new settlement or by any other methods should:

- have full regard to the presence of the International, European and national protected sites and any potential impacts on those sites and their species;
- there should be a strategic environmental assessment and, where necessary, a Habitats Regulations assessment, carried out to inform the preferred options; and
- any need for mitigation measures required due to impacts identified through such assessments, need to be considered early in the process so that suitable location and effective measures can be considered.

These points are discussed in more detail in the annex attached to this letter.

If these conditions were not to be fulfilled for any planning application following from the Preferred Options or later stages of the plan-making process, the new Local Plan would be at odds with the Council's own commitments to take a strategic approach to mitigation and to secure and strengthen the natural environment. The RSPB believes that the development pressures within the Council's area are such that it will be necessary to address issues such as redeveloping industrial areas to resolve the conflicts between meeting population and other growth needs and protecting nature conservation sites and their species in perpetuity.

As stated above, the RSPB does not question the need to provide housing and employment opportunities in Medway. However despite the background information provided within this Issues and Options Consultation, the Council has not demonstrated that it is essential to cause the significant harm predicted to the nationally important Chattenden Woods and Lodge Hill SSSI and its species, resulting from the Lodge Hill application, in order to deliver its housing needs. (These points are discussed in more detail below but it should be noted that this is the only SSSI in the SSSI network notified for nightingale as a single species and should the development go ahead the direct loss of SSSI would account for one of the largest losses of an area of SSSI in the UK).

It is worth highlighting that the nightingale population in Britain has undergone severe and ongoing declines in the last 45 years, with a contraction of the population into south-east England, such that it is has been red listed in the most recent Birds of Conservation Concern^{2,3}. The BTO/RSPB/JNCC Breeding Bird Survey indicated that nationally, the species declined by 37% between 1995 and

² http://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf

³ Hewson and Fuller (2012). Factors Potentially Affecting the Viability and Success of Biodiversity Offsetting to Compensate for Nightingale Habitat Loss. BTO.

2013⁴, whilst longer term data indicates a decline of more than 90% in the last 40 years⁵. Chattenden Woods and Lodge Hill SSSI is of national importance for nightingale, comprising more than 1% of the British population.

Allocation

The RSPB particularly welcomes the SLAA stating that:

“4.19 Sites were excluded from further assessment if they were constrained by one or more of the following restrictive designations that are present in Medway:

- North Downs Woodlands SAC
- South Thames Estuary and Marshes SPA, Ramsar & SSSI
- Medway Estuary and Marshes SPA, Ramsar & SSSI
- Cobham Woods SSSI
- Northward Hill SSSI
- Dalham Farm SSSI
- Chattenden Woods and Lodge Hill SSSI
- Tower Hill to Cockham Wood SSSI
- Halling to Trottscliffe Escarpment SSSI
- North Kent Downs AONB
- Flood Zone 3b Undeveloped Land”

The SLAA goes on to consider designated sites (at para 4.54) setting out the relevant NPPF requirement:

“Designated Habitats – National & International

4.53 Paragraph 113 of the NPPF states: “Distinction should be made between the hierarchy of international, national and locally designated sites, so that protection commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks”.

4.54 As explained in paragraph 4.19, sites that fall directly within an internationally or nationally designated habitat have been screened out at stage 1 of the suitability assessment process.

4.55 However it is recognised that even if a site does not fall directly within an internationally or nationally designated habitat, development nevertheless has the potential to have adverse impacts upon these areas. Furthermore consideration also needs to be given to the impact of development upon ancient woodland and also Marine Conservation Zones.”

In light of these welcome exclusions the RSPB does not understand why Lodge Hill has remained allocated in light of the Council’s statement and without any detailed explanation for this approach. The information provided in the Appendices to the SLAA includes (re Ecological Potential):

“The site is known to accommodate protected species and habitats. However, based on information submitted in support of the extant planning application, it is anticipated that the impact on these capable of mitigation and/or compensation. Investigation into this issue is ongoing.”

And re designated habitats, state that:

⁴ RSPB et al (2015) The State of the UK Birds 2015. https://www.rspb.org.uk/Images/sukb2015_tcm9-409524.pdf

⁵ Holt, Hewson & Fuller (2012). The Nightingale in Britain: status, ecology and conservation needs. British Birds 105: 172-187.

“Development of the site is likely to have a detrimental impact on designated habitats. However, based on information submitted in support of the extant planning application, it is anticipated that this impact is capable of mitigation and/or compensation.”

It is important to note that the approach on both of these categories relies upon the Applicant’s documentation and both of these points are yet to be evaluated through the Lodge Hill public inquiry which is scheduled for 2017.

More generally the RSPB is profoundly concerned by the way in which the Lodge Hill site has been considered in the current SLAA. Although we welcome the fact that the Council has treated the site as uncertain due to not having planning permission, we note that the site is included in the list of Suitable Housing Sites and that the full total of 5,000 units for the Lodge Hill scheme is used. This means that the Council is relying on Lodge Hill to provide 17% of its total needed housing units during the Plan period. However, given the significant current discrepancy between the number of sites in the SLAA and the total housing need, if Lodge Hill does not get developed for housing the Council will only have 6,114 units against its target of 29,463 (a total figure in the SLAA that is less than 21% of the target). We are therefore concerned that the Council is consulting on this option despite such uncertainty over its potential deliverability.

Rating

Paragraph 4.52 of the SHLAA states:

“... In considering the site at Lodge Hill, the council recognised the developers proposed a compensation and mitigation package to address impact on the features of the SSSI. However, as this is a key matter to be considered through a Public Inquiry in 2016, an Amber rating was viewed appropriate.”

The Amber designation at this point means “The presence or absence of protected species and/or habitats cannot be established at this stage”.

As the site was notified as a Site of Special Scientific Interest by Natural England in 2013 it is difficult to see how this approach can be presented credibly on behalf of the Council. In addition, although the RSPB welcomes the mitigation and compensation proposals accompanying the Lodge Hill application, due to the lack of ecological and legal certainty regarding how those proposed measures will be achieved and delivered, including if needed whether planning permission will be granted for the chosen compensatory area(s), mean that the inclusion of these measures at this stage is premature. Lodge Hill will have direct effects within the SSSI and possible indirect effects on Ramsar sites, SPAs, SAC and other SSSIs. These effects include:-

1. Increased recreational pressure arising from the Lodge Hill proposal that may affect national, European and international designated sites for example the Foulness SPA/Ramsar site, Crouch and Roach Estuaries SPA/Ramsar site and Essex Estuaries SAC which at present the RSPB thinks needs further assessment in light of updated surveys.
2. Direct and permanent destruction of significant areas of the Chattenden Woods and Lodge Hill SSSI, including:
 - Scrub, woodland and associated supporting habitats that hold the majority of the nationally important population of breeding nightingales for which the SSSI is notified; and
 - The majority of the nationally scarce neutral grassland for which the SSSI is notified.

3. Indirect effects - the remaining breeding nightingales can be expected to suffer significant negative impacts from a combination of various urbanisation effects (for example trampling of habitat, disturbance, predation and eutrophication) which will persist for the lifetime of the Lodge Hill development; and
4. Impacts on other SSSI breeding bird populations for example turtle dove (currently red-listed in the Birds of Conservation Concern 4⁶ due to significant long-term declines and being identified in the most recent State of the UK Birds (2015)⁷ as showing one of the greatest declines of any UK breeding bird species with a 97% decline between 1970 and 2013).

Therefore the Lodge Hill application listing, at this stage, should be made purely on the basis of the known harm it will do to the SSSI, SAC, SPAs and Ramsar sites, not on the basis of future mitigation and compensation proposals that may or may not overcome these known effects.

On the basis of the Council definition for red listing *“Development of the site is likely to have a detrimental impact upon internationally/nationally designated habitats which is not considered resolvable.” “Site has direct relationship with the designated site and its sensitive features.”* Lodge Hill must be included within the Red List.

In addition, it is our view that the application runs directly counter to national planning policy (one of the reasons for the application being called in by the Secretary of State). Therefore the RSPB is profoundly concerned by the continued reliance on Lodge Hill as a key part of the housing figures that the Council is advancing. If the Secretary of State decides not to grant planning permission following the Inquiry in 2017 the consequences for the development of the Plan will be at least as serious as for the Council’s previous draft Core Strategy. We strongly urge the Council to re-evaluate all the housing site data that it holds to ensure that the Plan is not reliant upon the delivery of 5,000 housing units at Lodge Hill.

Overall Housing Conclusions

The RSPB considers that the SLAA submitted with the Issues & Options document is clearly inadequate for the purpose and that as a result it needs to be redone to clearly identify a sufficient number of housing units, without relying upon the Lodge Hill site. This may need to be a multi-round approach, working out which sites are entirely unacceptable and then reconsidering some of the other categories (e.g. distance from certain facilities) until the requisite number of housing units is arrived at.

The Council needs to demonstrate that the Plan will comply with the National Planning Policy Framework (NPPF)(these are discussed in detail below in the annex attached to this letter) including the tests of soundness set out in paragraph 182 of the NPPF. At present the SLAA suggests that the Council fails to meet all four of the tests. It is not:

- **Positively prepared** – as at present it appears incapable of meeting the objectively assessed housing requirements of Medway;
- **Justified** – as the Plan currently fails to meet the objectively assessed housing requirements by a significant extent, it cannot be considered to be the most appropriate strategy, when considered against the reasonable alternatives, and it is clearly not based on proportionate evidence;
- **Effective** – if the Council is unable to identify where its housing should go then the plan will not be deliverable over the Plan period; and

⁶ Eaton M.A., Aebischer N.J., Brown A.F., Hearn R., Lock L., Musgrove A.J., Noble D.G., Stroud D.A. & Gregory R.D. 2015. Birds of Conservation Concern 4: the population status of birds in the UK, Channel Islands and Isle of Man. British Birds. 108, 708-746.

⁷ RSPB et al (2015) The State of the UK Birds 2015.

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. Reliance on the Lodge Hill scheme runs counter to the stipulations in paragraphs 117 and 118 of the NPPF (please see below).

Economy - Employment land

The RSPB does not have a strong view on the distribution of new employment development within the existing employment area identified within the Local Plan, subject to any such developments respecting environmental sensitivities, in particular the network of nature conservation designations within the borough. This requirement is particularly relevant to future potential intensification of heavy industry development at Kingsnorth and Isle of Grain, which has the potential to impact on coastal areas of national, European and international importance to wildlife.

With regard to the potential for a new employment site at Lodge Hill, we would remind the Council that the evidence base supporting the recent outline planning application for this site (submitted in February 2014) indicated that the area currently proposed (in the application) for commercial floorspace and the proposed timing of its release mean that this site would not significantly contribute towards the employment needs of the wider borough, and would largely only meet the employment demand generated by the new housing proposed as part of the wider scheme.

Furthermore, we note the concerns raised within the Medway Employment Land Assessment Report (supporting the Issues and Options Consultation) with regard to the employment potential at Lodge Hill. The Report considers that due to the lack of any existing employment market demand in this area, employment potential for the site is unlikely to be realised until any new settlement on the site is established, which, *if the site were to receive permission, would not be realised until later in the Plan period. It goes on to caution any predictions of future economic activity at the site “given the need to establish it as a place first, the lack of an existing high quality office market in this area and the still relatively weak market for business parks in Kent”* (paragraph 9.20). An example is given of another business site in Tonbridge and Malling (Kings Hill) that failed to deliver its predicted employment potential, supporting the need for placing caution on such future predictions.

Given the added uncertainty of the deliverability of the Lodge Hill site, the RSPB would strongly advise against placing any weight on this as an employment opportunity area within the Local Plan.

It is noted that a number of other potential employment sites are identified within the Medway Employment Land Assessment Report, including the Thameside Industrial Estate at Cliffe. We would caution the allocation of this site, as expansion of the existing low level use of this site raises significant access and environmental issues (acknowledged within the Report – paragraph 7.95). It is important that the potential environmental and ecological impacts of all such sites identified within the Report are carefully assessed should they are taken forward into the next stage of the Local Plan.

Although we have tried to cover all relevant points with this response, however there may be other issues of importance to the RSPB that only arise once the preferred options are identified.

Open Space

The RSPB supports the creation and protection of a high quality network of open spaces to help support sustainable development within Medway. The Consultation highlights deficits in the existing quality and quantity of some types of open space within the borough, and further highlights Medway’s comparatively low standard for new open space provision through development compared to neighbouring boroughs.

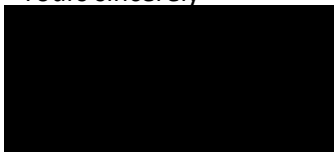
While efforts to improve the quality of the open space network appear to be underway in Medway (the Consultation describes significant investment in recreational spaces and some other types of open space), the shortfall in accessible open spaces will undoubtedly place increased pressure on the nationally, European and internationally important coastal areas within and adjacent to the borough. As the Council is aware, a mitigation strategy is being developed to protect these sites from additional recreational pressures arising from new housing development in the wider area.

It is recommended that, where new and improved recreational areas (Suitable Alternative Natural Greenspace, 'SANGS') are proposed to reduce pressure from new development (either through the North Kent strategic mitigation and management strategy or as part of bespoke mitigation for individual developments), the Council should ensure that such proposals maximise the value of existing accessible open spaces, for example by ensuring that new sites link into the existing network, creating larger accessible areas and reducing the overall cost of their future management.

We look forward to further opportunities to participate in the subsequent stages of the preparation of the plan and request that if at all possible you contact us directly once those further stages become available. In addition we would welcome the opportunity to meet with you early in the Consultation process to highlight and discuss the RSPB's concerns.

As mention above, although we have tried to cover all relevant points with this response, there may be other issues of importance to the RSPB that only arise once the preferred options are identified.

Yours sincerely



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Legal and Policy Annex

There are a number of legislative provisions and policies that are relevant to this Options and Issues' Consultation as well as the Local Plan and the Council more generally. We have set these out below, highlighting how, in our view, they are relevant.

1. Nature conservation law

Sites of Special Scientific Interest and the Wildlife and Countryside Act 1981 (as amended)

- 1.1. Sites of Special Scientific Interest (SSSIs) are the most important sites for national wildlife and natural features in England. In England, SSSIs are notified by Natural England who has a duty under Section 28 of the Wildlife and Countryside Act 1981 (as amended) (**the WCA**) to notify SSSIs where it is of the opinion that an area of land is of special interest by reason of any of its flora, fauna, or geological or physiographical features and to secure their day-to-day protection and conservation.
- 1.2. The purpose of SSSIs is defined in the Defra Code of Guidance⁸ (paragraph 1) as being:

"...to safeguard, for present and future generations, the diversity and geographic range of habitats, species, and geological and physiographical features, including the full range of natural and semi-natural phenomena throughout England..."
- 1.3. SSSIs make a fundamental contribution to the ecological processes upon which we all depend and to human quality of life. Individual SSSIs may also provide, or safeguard for the future, valuable research, educational and amenity resources.
- 1.4. Under Section 28G(2) of the WCA, public bodies must:

"...take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest".
- 1.5. The Defra Code of Guidance (paragraph 73) states that the Secretary of State expects that all public bodies will take full account of their responsibilities under this duty whenever their actions may affect SSSIs.
- 1.6. Government Circular 06/2005⁹, paragraph 61 requires all section 28G authorities, including local planning authorities, to apply strict tests when carrying out any functions within or affecting a SSSI, to ensure that they avoid or at least minimise adverse affects. It also requires public bodies to adopt the highest standards of management in relation to SSSIs in their ownership and to take positive steps wherever possible to conserve and enhance the special interest features of a SSSI where their activities may be affecting it or as opportunities arise in the exercise of their functions.
- 1.7. As set out above the RSPB welcomes the exclusion from consideration of developments within these nationally important sites. However it questions how the Lodge Hill proposed development, with its direct damage to the Chattenden Woods and Lodge Hill SSSI and its

⁸ Defra (2003): Sites of Special Scientific Interest: Encouraging Positive Partnerships.

⁹ Government Circular 06/2005: Biodiversity and geological conservation – statutory obligations and their impact within the planning system, 16 August 2005.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf.

notified features can be included within the SHLAA and therefore form part of the draft Local Plan and the Section 28G(2) duty be complied with.

The Natural Environment and Rural Communities Act 2006

- 1.8. Section 40 of the Natural Environment and Rural Communities Act 2006 (as amended) sets out a public authority's duty to conserve biodiversity. It states that:

"Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."

- 1.9. The RSPB welcomes the Council's commitments to the conservation of biodiversity as set out in the Consultation but again questions how Lodge Hill can remain within the development options and this duty be complied with.

The Conservation of Species and Habitats Regulations 2010 (as amended)

- 1.10. The RSPB wishes to highlight that compliance with Regulation 9 of the Habitats Regulations is also required. Regulation 9A(1) of the Regulations provides:

"(1) Without prejudice to regulation 9(1), the appropriate authority, the nature conservation bodies and, in relation to the marine area, a competent authority must take such steps in the exercise of their functions as they consider appropriate to secure the objective in paragraph (3), so far as lies within their powers."

(2) Except in relation to the marine area, the Environment Agency, the Forestry Commissioners, local authorities, the Broads Authority and National Park authorities must take such steps in the exercise of their functions as they consider appropriate to contribute to the achievement of the objective in paragraph (3).

(3) The objective is the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the United Kingdom, including by means of the upkeep, management and creation of such habitat, as appropriate, having regard to the requirements of Article 2 of the new Wild Birds Directive...

...(7) In considering which measures may be appropriate for the purpose of securing or contributing to the objective in paragraph (3), appropriate account must be taken of economic and recreational requirements."

- 1.11. And in addition Regulation 9A(8) provides that:

"So far as lies within their powers, a competent authority in exercising any function in or in relation to the United Kingdom must use all reasonable endeavours to avoid any pollution or deterioration of habitats of wild birds (except habitats beyond the outer limits of the area to which the new Wild Birds Directive applies)".

Strategic Environmental and Habitat Regulations Assessments

- 1.12. Whilst we acknowledge that a strategic environmental and Habitat Regulations assessments of the plan cannot not be carried out until proposals and options are confirmed, the RSPB strongly recommends that consideration be given to the requirements of those assessments now, to ensure that all unsuitable sites are excluded and adequate information is available to complete them once there is a draft Local Plan.

- 1.13. For example Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations (2004)(as amended)(the SEA Regulations) states that the *responsible authority shall prepare.... an environmental report* and that

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of–

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

- 1.14. Schedule 2 of the SEA Regulations sets out in more detail what is required particularly paragraphs 6, 7 and 8:

“6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues”

“7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.”

“8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

- 1.15. The Government’s SEA Guidance¹⁰ explains:

“2.24 It is not usually appropriate in SEA, and is often impracticable, to predict the effects of an individual project-level proposal in the degree of detail that would normally be required for an EIA of a project. If, however, a plan or programme proposes a specific development or type of land use for a particular area or location, the Environmental Report should include information which can reasonably be provided on the likely significant effects of that proposal and alternatives to it.”

- 1.16. With the Guidance confirming that all necessary comparable information must be presented to enable the decision maker to be fully informed and therefore able to consider the implementation of the Local Plan or any of the alternatives:

“5.B.7 It is not the purpose of the SEA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental

- 1.17. In light of this guidance the RSPB again wishes to highlight the lack of information currently provided as to why many sites have been excluded early in the SHLAA process. In our view it is important to understand exactly why these sites were excluded particularly in light of the Lodge Hill site remaining so that full consideration can be given to all possible development sites to meet the Council’s housing and employment needs.

¹⁰ A Practical Guide to the Strategic Environmental Assessment Directive Practical guidance on applying European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment September 2005 Office of the Deputy Prime Minister (ODPM Practical Guidance)

2. The National Planning Policy Framework

- 2.1. The Government has clearly directed that Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the national planning policy framework (NPPF).
- 2.2. The National Planning Policy Framework (**NPPF**) is the Government's flagship planning policy. It is designed to encourage the provision of development where it is needed, while at the same time protecting the environment from damaging development.

The need for strategic planning to meet objectively assessed needs

- 2.3. The NPPF sets out in a number of policies about the importance of local plan making in delivering sustainable development and meeting objectively assessed needs:

- 2.4. Paragraph 12 of the NPPF states:

"This National Planning Policy Framework does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place."

- 2.5. Paragraph 14 of the NPPF states:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking."

For plan-making this means that:

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.*⁹

⁹ *For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.*

- 2.6. Paragraph 17 of the NPPF sets out 12 core principles that should underpin both plan-making and decision taking. These 12 principles are that planning should:

- *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;"*

2.7. It is our view that the allocation of a Site of Special Scientific Interest (SSSI) as a strategic development allocation for both housing and business is incompatible with the policy objectives set out in the NPPF in the following paragraphs:

- 14 the proposed allocation would not be sustainable development because of its impact on the Chattenden Woods and Lodge Hill Site of Special Scientific Interest;
- 152 the proposed allocation does not avoid avoidable adverse impacts on an SSSI; and
- 118 the proposed allocation is inconsistent with the principles set out in terms of conserving and enhancing biodiversity, and the benefits of development at this location do not outweigh the impacts on the SSSI and the national network of SSSIs.

2.8. In addition the NPPF includes conserving and enhancing the natural environment policies as set out in paragraph 117 as follows:

“To minimise impacts on biodiversity and geodiversity, planning policies should:

- *plan for biodiversity at a landscape-scale across local authority boundaries;*
- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *promote the preservation, restoration and re-creation of priority habitat, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;*
- *aim to prevent harm to geological conservation interests; and*
- *where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.”*

2.9. And in relation to the presumption in favour of sustainable development (paragraph 14), paragraph 119 makes it clear that this presumption does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. As set out above due to the increase of recreational pressures on the near by Ramsar sites, SPAs and SAC information has been gathered for an appropriate assessment to accompany the Lodge Hill planning application and therefore should not benefit from the presumption. For the Council to ensure that its Local Plan fulfils the NPPF’s requirement for sustainable development, Lodge Hill should at least be re-categorised or preferably excluded from the strategic development allocation.

Examining Local Plans

2.10. As you are aware Local Plans are examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. As set out above but included here for completeness - a local plan is “sound” when it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

In light of the comments made above we question whether even at this early stage the proposals that are being taken forward (considering the underlying evidence provided with the Consultation) would enable a sound local plan to be drafted.

Name: Elona Walker

Reference

69

Organisation

Chatham Maritime Trust

On Behalf Of

Type of Consultee

Charity/Community/Faith Group



Medway Council Local Plan - developing a Vision for Medway in 2035

Comments from Chatham Maritime Trust

Introduction

The Chatham Maritime Trust welcomes the progress demonstrated by the Issues and Options consultation document relating to the Local Plan.

Medway needs the extra certainty which a successful Local Plan will bring.

We feel that it should be born in mind that, since the 2003 plan the numbers of people living, working, studying and “playing” at Chatham Maritime have dramatically increased. When the Chatham Maritime Trust’s estate was originally planned it was anticipated that there would be 1600 houses and 5000 jobs on the estate; we are currently at a point where we have 1700 current homes, with another 700 anticipated over the next few years (final phase SMI and Colonial House redevelopment), 11,000 jobs on site, 10,000 students, and 40-60,000 people using the leisure facilities on site every week.

In relation to our later comments, it may be best to consider that the Chatham Maritime area of Medway encompasses the area previously used as the Naval Dockyard before its closure in 1984; this land was divided into three portions- the oldest 80-acre area becoming the Historic Dockyard (CHDT), Basin 3 and its environs becoming Chatham Docks (to include UTC, Asda, and the new Chatham Waters development), and the remaining 350 acres coming under the control of Chatham Maritime Trust (in part in conjunction with HCA).

Strategic issues

6.1 Road and public transport infrastructure are key - what will be the effect of Paramount, Lower Thames crossing, increased number of homes and jobs. The effect of these on the Chatham Maritime area needs to be assessed and any adverse effects counteracted.

6.2 If Medway is projected to grow at this rate, what about London - and the effect of further eastward drift to Medway from there?

6.6 Hospital facilities and school places need to be adequate for the population as it grows.

6.7 Thames Estuary 2100 Plan - framework for tidal flood risk management in Medway. CMT would be happy to work alongside Medway Council in this area, sharing our knowledge of flood risk management.

Housing

7.5/ 7.23 There are now around 10,000 students at the Universities at Medway, based at Chatham Maritime. This supports your assertion relating to student housing, although the number of students at Medway who live at home while studying is higher than the national average, and there are significantly more mature students than levels elsewhere.

7.7 & 7.17 An assisted living facility is being built as part of final phase at St. Mary’s Island.

Thought also needs to be given in terms of provision for people with other needs, e.g. the "Halpern Model" housing at Maidstone Road, Chatham, Maidstone Road, Rochester and Boundary Road, Chatham.

7.8 & 7.20 There is a large amount of undeveloped land at Chatham Maritime - unused for more than 20 years but designated to build on. This could and should be used to assist in the 29,463 new homes required by 2035. This land is currently in the ownership of HCA, and is earmarked to be transferred to CMT after development.

7.15 CMT is concerned that adequate access to local health care should be available to all.

7.26 The issue of travellers has become more significant in recent years. CMT has had to take measures to minimise the risk to our land from travellers including the placement of large granite blocks around the estate to prevent travellers settling on our land. CMT would therefore be grateful for further consideration to be given to where land can be allocated in Medway to reduce these issues.

Economy

8.1 The Creative economy in Medway is going from strength to strength. This is contrasting the fact that Chatham Docks are thriving, with many people working there, increasing numbers of jobs, and ships coming in and out routinely every week.

8.2 CMT are pleased to see the acknowledgement of the highly successful learning quarter at Chatham Maritime.

8.3/ 8.14 All offices are full at Chatham Maritime and there is proof that there is demand for more office here.

8.5/ 8.8/ 8.9/ 8.12 CMT are concerned about the outward flow of workers - but as job levels in Medway are low for the population this is understandable. There needs to be expansion of jobs, requiring consideration before using all available land for housing. We need to allow space to create new jobs.

8.9 Long term sick levels are high in Medway. CMT believe that we should look at ways of improving health and wellbeing to improve the economic workforce e.g. through MARC, Art Inclusive or similar projects.

8.13 There are 11,000 jobs currently on our estate, not including CHDT & Chatham Docks. The Compass Centre is full. We would have concern that if the Medway City Estate is converted into residential there would be a substantial deficit in employment opportunities in Medway.

Tourism

Chatham Maritime is recognised as a major tourist destination, largely due to the CHDT. CMT has, on its estate, 2 hotels - the new Travelodge, recently given a £600,000 makeover, and the Ship and Trades, a boutique hotel which is currently extending the number of rooms.

We believe that there is a substantial and untapped market for improving the tourism in this area, not least with the provision of the new Watersports facility and the distillery at the Pump House. With the Marina extension and new investment in the Dockside Outlet, this area is booming and has much to offer visitors to the area.

Retail, commercial leisure & town centres

CMT would assert that, within your classification of Medway centres, Chatham Maritime should be considered as separate and in its own right due to the large numbers of people using the area (up to 90,000 per week). Chatham Maritime has not only retail and commercial space, but other leisure including cinema, theatre, and watersports to name but a few.

Built Environment

CMT recognises the unique historical environment and heritage of Medway, together with its estuarine landscape; within this context we are keen to see design maintained at a high standard as we have consistently done at Chatham Maritime.

We believe in developing a Modern Medway - this must be done via quality through regeneration while protecting the past and the natural environment.

Infrastructure and Services

14.2 Chatham Maritime Trust is keen to promote healthier lifestyle choices, and as such has provided an extensive network of walking and cycle paths around Chatham Maritime including alongside the river and across landscaped bunds. The new watersports centre, alongside the two gyms on site, will further improve the exercise facilities here.

Chatham Maritime Trust also runs our Community Centre on St Mary's Island; this is at the heart of many of our community activities, leading to Chatham Maritime being a great place to live, work, study and play.

14.3 With its provision of good security including CCTV, an Estates Officer and PCSO, Chatham Maritime is considered to be one of the safest areas in Medway; indeed students here rate it as the fourth safest campus in the UK.

14.4 The Surgery at St Mary's Island appears to be close to capacity; with growth in population we believe that further healthcare facilities will be required, perhaps including dentists etc. CMT has concerns that the Medway Maritime Hospital will require additional assistance in order to meet the needs of this increased population.

14.6 Telecare is an interesting proposal, but this requires a broadband infrastructure which is not yet of a high enough specification.

Social and Community Infrastructure

15.4 The Community Centre at St Mary's Island at Chatham Maritime is a purpose-built facility which is heavily used and which plays an essential role in fostering community at Chatham Maritime.

Nucleus Arts also supplies a large number of community settings and facilities which many consider to be at the heart of the creative community.

Open Space

16.1 The open and landscaped areas of Chatham Maritime have created a unique sense of place. These have also contributed to the diverse range of wildlife which has made its home here, including many species of birds. These areas include the Central, East and West Bunds and Riverside Walk in addition to the two Dock Basins and three playgrounds. Final phase will bring in further areas of landscaped bunds.

Sports Facilities

Chatham Maritime will be adding to Medway's sports facilities imminently with the provision of the Watersports Centre. This will include access to all types of non-motorised water sports in addition to open water swimming and diving. This is in addition to the two new gyms on our site. There are plans for further facilities in due course, and we are looking at participation in triathlon events in the future.

Sustainability and climate change

Existing provision of broadband requires upgrading in the main to ensure that we are able to meet the needs of the population both in their work and private lives.

CMT is keen to stress that adequate access to healthcare is provided alongside the increasing population.

An improved public transport infrastructure is needed to cope with the increasing population, and to minimise the necessity of all adults owning cars to get to work.

Access to green spaces is essential for a healthy and happy population. Chatham Maritime has several green spaces including many trees of appropriate varieties.

Environmental sustainability - CMT is looking at green infrastructure and technologies, in conjunction with the Engineering Department at University of Greenwich at Medway. Flood defences at Chatham Maritime have been raised so that they could cope with a river level substantially higher than the highest ever supertide.

Flood Risk

23.2 Flood defences at CM have been raised so that they could cope with a river level substantially higher than the highest ever supertide.

Energy

Chatham Maritime Trust wholeheartedly supports policies which would make greater use of renewable energy sources.

Transport

25.3 The train network does not currently extend to Chatham Maritime although we understand that there is a requirement on Peel Ports as part of the Chatham Waters development to re-instate the railway to this area. This will be enormously beneficial to all who use Chatham Maritime.

25.4 The new bus station in Chatham town centre is of a high standard. We would, in the absence of a train station at Chatham Maritime, like to see continued improvements to bus infrastructure serving the 90,000 people routinely using the Chatham Maritime area. We also have concern that, while the bus network extends between Medway and Kent, Kent bus passes are not accepted in Medway - this restricts travel and so reduces opportunities.

25.5 CMT supports the creation and maintenance of cycle paths, and indeed has well-used cycle paths across the majority of the estate.

25.6 CMT would be interested in looking at ways to facilitate the use of the river as a means of public transportation. The Marina at Chatham Maritime is full with a waiting list; this will be met by the extension of the Marina in the coming months.

25.7/ 25.8/ 25.10 Chatham Maritime is in a "bottleneck" area; at peak times Dock Road can be almost impassable, whether traveling to/from the Medway Tunnel, Gillingham, or Chatham. With Chatham Maritime having now reached such a capacity, any increase in these numbers- whether from development within our estate, in surrounding areas, or indeed (and especially) from Medway City Estate - could make this area entirely gridlocked. Therefore, serious thought needs to be given to what new infrastructure needs to be put in place in order to mitigate this situation.

In addition to this, CMT has genuine concerns as to the levels of parking allowed for on past developments in terms of residential and office areas. This has been a major problem for us here at Chatham Maritime, and we would urge Medway Council to factor in more parking provision in new developments. In particular we would stress that many factors, not least the cost of housing and levels of unemployment, have led to many "children" living at home for extended periods. This leads to sometimes up to 5 cars at a house designed with parking for 2.

Deliverability

26.11 CMT firmly believe that good design is crucial in the deliverability of an effective local plan.

Development Strategy

We must be careful to weigh up the issues around creating too high-density an area which could create its own problems once established. We should also take care not to "throw the baby out with the bathwater" - by reducing green belt areas we could remove one of the qualities which make Medway, as a place, so good to live and work in.

Chatham town centre is certainly in need of assistance, and I believe that this would be well suited to a mixed-use centre. There are some very good examples of organisations and retailers there, but there are many empty shops and development sites which break up the town and give it a feel of a lack of economic prosperity. Considerable investment needs to be made in order to overcome these obstacles. There is considerable scope available in terms of areas of residential development, although this must not substantially reduce the parking available. Underground car parks/ buildings over existing car parks are of course possible. Consideration should be given to the burgeoning Creative economy in Medway, in Chatham in particular; this could be exploited to make this a greater destination in itself, akin to Brighton. Nucleus Arts already hosts around 60 artists in studios, workshops and creative office spaces; this, in addition to other providers such as at the Historic Dockyard, Joiner's Shop, West End studios, SPH, the Featherstone studios and Intra show an increasing need in the area for this type of workspace.

Answers to questions raised throughout the issues and options consultation document.

2/ The plan should not be designed in isolation. Road and Public Transport infrastructure is key in addition to sufficient healthcare and school capacity.

3/ Road and public transport infrastructure - Paramount, Lower Thames crossing, increased number of homes and jobs all need to be considered. CMT is concerned as to the effect of these on the Chatham Maritime area.

6/ CMT considers that this is a good level in terms of affordable housing, but considers that s106 transfers should be considered to place this elsewhere where necessary.

7 & 8/ An assisted living facility is being built as part of final phase at St. Mary's Island. Thought also needs to be given in terms of provision for people with other needs, e.g. the "Halpern Model" housing at Maidstone Road, Chatham, Maidstone Road, Rochester and Boundary Road, Chatham.

9/ The experiences of groups such as Nucleus Arts, MARC, and other eminent establishments has shown that there are various ways where development and communities can make a positive contribution to the health and wellbeing of communities. CMT believe that we should work with these and other organisations to harness the imperative research which has been and still needs to be done to maximise the positive impact on Medway's communities.

10/ There is a large amount of undeveloped land at Chatham Maritime - unused for more than 20 years but designated to build on. This could and should be used to assist in the 29,463 new homes required by 2035. This land is currently in the ownership of HCA, and is earmarked to be transferred to CMT after development.

11/ Infrastructure is key to successful development and use by its communities. It is imperative that appropriate road and public transport infrastructure is put in, and that this should be in place by the time people move in to developments.

12/ CMT believe that placemaking is crucial to successful communities, but flexibility is always essential.

13/ There is a high demand for student housing. Existing developments around Chatham Maritime and Gillingham are crucial, but there are interesting possibilities around student housing in Chatham town centre which would further improve circulation around the towns and between Universities.

16/ CMT believe that there is significant scope for increased business growth in the Chatham Maritime area; this could include building over some of the open car park areas.

19/ CMT believe that Medway could consider greater communication between businesses and the universities to ensure that the courses reflect genuine business needs, and thus to retain graduating students. In the same way, the educational establishments should be communicating effectively with outside developers e.g. Paramount, to ensure that we are able to create jobs for the population if not in Medway then in the immediate vicinity.

21/ Medway is very lucky to have Chatham Docks, a fully working area with a large capacity. Many of the businesses there require exactly these conditions, and were such a facility not available here we would lose these businesses, often paying high wages to their staff, from the

area. Therefore it is important that we do not sacrifice these unique places to create additional residential space.

22/ The newly refurbished Travelodge (formerly the Ramada) will greatly assist in the provision of accommodation alongside the extension to the Ship And Trades. However, there is still likely to be a market for further "boutique" type hotels across Medway.

23/ It is important to look at all aspects of the areas surrounding the major tourist attractions in order to prolong the stay of tourists. We believe that Chatham Maritime has a great number of "unsung" benefits which will assist with this, and we would be happy to work with Medway Council on this.

24/ The River Medway is a great asset to Medway, and one which we, at Chatham Maritime celebrate with our River Walk and Central Lookout in addition to the Marina. We would welcome greater use of this asset.

25/ Chatham centre clearly needs a great deal of investment in order to consolidate its position; however, Chatham Maritime's role in Medway should not be overlooked, and the offer available needs to be creating critical mass rather than competition between centres.

27/ While it is reasonable that some areas are particularly know for, say, food and drink or retail, there should be a reasonable mix of all types across each centre.

29/ When we have acknowledged Bluewater as a substantial draw, we do not believe that there is call for creating additional large out of town retail in Medway; rather it is better to concentrate on the amazing diversity here already, and potentially possibly in the future.

34/ Good design combined with an interesting and culturally diverse environment creates a good place to live; we would support policy which encourages this standpoint.

35/ There are many distinctive areas within Medway; at Chatham Maritime we are pleased to be guardians of one of these.

45/ Extending the cycle paths and ensuring that people feel safe when walking will help encourage greater physical activity; this should be combined with ensuring that road and public transport infrastructure is sufficiently robust to allow people to reach all locations.

48/ Good community facilities which are fit for the purpose are essential in building sustainable and healthy communities. We believe that these should be run with the expectation that they are not commercial ventures, but should be cost neutral. It may well be that organisations already running such facilities should take over Council centres in order to ensure good governance and efficiency.

49/ CMT believes that, wherever possible, the integrity of open space should largely be preserved.

52/ The CMT model allows for inclusion of open space within the development, and we believe that this is a good way forward.

53/ Community involvement is a great way for people to feel a sense of pride and ownership in their area; however it may not always be relied upon as volunteers and community champions may be hard to find. There are organisations such as Nucleus Arts and Medway Plus who are working in these fields already and may be able to give further guidance.

61/ Sustainable development in Medway should show a good proportion of green space and trees, good access to healthcare and to public transport. Plans should be put in place to encourage green technologies.

62/ Good public transport is essential to reducing the inequalities to allow access for all to all spaces.

63, 64/ New developments should be encouraged to use green technologies wherever possible, going beyond the scope of just solar panels. Parking and garden areas should be designed to deal effectively with water retention issues. Existing developments should allow the alterations required, and there should be measures in place to prevent the whole-scale uprooting of trees and landscaping in developments to save funds.

71/ Chatham Maritime is in a "bottleneck" area; at Peak times Dock Road can be impassable, whether traveling to/from the Medway Tunnel, Gillingham, or Chatham. With Chatham Maritime having now reached such a capacity, any increase in these numbers - whether from development within our estate, in surrounding areas, or indeed (and especially) from Medway City Estate - could make this area entirely gridlocked. Therefore, serious thought needs to be given to what new infrastructure needs to be put in place in order to mitigate this situation.

72/ Consideration should be given to extending the Kent Freedom Pass scheme and similar schemes across Medway - this is a very effective tool in persuading people from a young age to use public transport effectively.

73/ Chatham Maritime has genuine concerns as to the levels of parking allowed for on past developments in terms of residential and office areas. This has been a major problem for us here at Chatham Maritime, and we would urge Medway Council to factor in more parking provision in new developments.

74/ Chatham Maritime would support the suggestion of using the river more effectively, and would welcome discussion as to how this could be achieved across Medway.

76/ CMT believe that the plan must be deliverable, and that as part of this it must be of high quality and sustainable.

78/ Infrastructure must be in place by the time people move into the developments - not be delivered a year or two after.

79/ It is sensible to designate certain areas for specific uses within reason, but a set design standard must be in place and be seen to be maintained e.g. our Restrictive Covenants based on "street scene".

80/ Chatham Maritime Trust supports these development principles, but considers good design and renewable energies should also be included in this area.

83/ CMT considers that caution should be exercised when looking at redeveloping existing commercial spaces into residential areas in order to minimise the reduction in work opportunities to the population of Medway.

84/ While the green belt land could be reviewed, CMT recognises the positive effect of such land, and would not want to see substantial reduction in these areas.

86/ Chatham town centre is certainly in need of assistance, and I believe that this would be well suited to a mixed-use centre. There are some very good examples of organisations and retailers there, but there are many empty shops and development sites which break up the town and give it a feel of a lack of economic prosperity. Considerable investment needs to be made in order to overcome these obstacles. There is considerable scope available in terms of areas of residential development, although this must not substantially reduce the parking available. Underground car parks/ buildings over existing car parks are of course possible.

Consideration should be given to the burgeoning Creative economy in Medway, in Chatham in particular; this could be exploited to make this a greater destination in itself, akin to Brighton. Nucleus Arts already hosts around 60 artists in studios, workshops and creative office spaces; this, in addition to other providers such as at the Historic Dockyard, Joiner's Shop, West End studios, SPH, the Featherstone studios and Intra show an increasing need in the area for this type of workspace.

Dalia Halpern-Matthews

Chief Executive

February 2016

Name: Christine Gurr

Reference

70

Organisation

St James Isle of Grain Parish Council

On Behalf Of

Type of Consultee

Councillor/MP/Parish Council

St James Isle of Grain Parish Council

Parish Clerk: Mrs Christine Gurr

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PLEASE NOTE NEW POSTAL ADDRESS

CG/142

29th February 2016

Planning Policy
Regeneration, Community & Culture
Medway Council
Gun Wharf
Dock Road
CHATHAM
Kent ME34 4TR

Dear Sirs

RE: LOCAL PLAN – ISSUES AND OPTIONS - 2012-2035

My members wished to comment as follows:

1)	<p><i>What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?</i></p> <ul style="list-style-type: none">• Enable all to be more pro-active in their communities, encourage companies to employ locally, better and more accessible training facilities and houses that are more affordable and local to communities that need them to enable work force to continue. Keep open spaces open – RURAL = RURAL
2)	<p><i>What do you think are the strategic issues that the Local Plan needs to address?</i></p> <ul style="list-style-type: none">• Expansion in other areas affects other areas – cross boundary is good but residents left unaware. Maintaining a balance between urban growth and rural growth is just not possible – people want areas to visit, walk and enjoy not just to be developed never to be seen again.
3)	<p><i>How should the council respond to these issues?</i></p> <ul style="list-style-type: none">• Take in to account expanding resident numbers – re-use existing old/dilapidated and badly managed before looking outwards. i.e. empty houses, offices built and never used/surplus to requirements. Healthcare at risk from excessive use – encourage use of rural open areas to improve health.

Chairman: Cllr Mrs V E Cordier, [REDACTED]

4)	<p><i>Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?</i></p> <ul style="list-style-type: none"> • Yes – to an extent but no future projections can be definitive.
5)	<p><i>What do you consider to be the appropriate housing market area for Medway?</i></p> <ul style="list-style-type: none"> • Affordable and rented accommodation – very few can afford the deposit let alone a mortgage these days.
6)	<p><i>6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?</i></p> <ul style="list-style-type: none"> • More % needed on both
7)	<p><i>What form of housing best meets the needs of Medway's growing population of older people?</i></p> <ul style="list-style-type: none"> • Many want to 'downsize' to release bigger home but one level and bungalows are the rarest and most expensive housing on the market (when you can find any)
8)	<p><i>What housing is needed for other specific groups in Medway?</i></p> <ul style="list-style-type: none"> • More centres homes needed and in turn will free up houses!
9)	<p><i>How can development make a positive contribution to the health and wellbeing of Medway's communities?</i></p> <ul style="list-style-type: none"> • Right mix improves communities – older members can stay to help younger get started.
10)	<p><i>Do you have suggestions for potential sites for starter home developments?</i></p> <ul style="list-style-type: none"> • Starter homes should be established in communities to help those in work get help from members of family who live locally
11)	<p><i>How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?</i></p> <ul style="list-style-type: none"> • Involve local community in putting forward areas they would consider 'appropriate/suitable' without destroying their community.
12)	<p><i>How should the council provide for the demand for land for self and custom build housing? For example, integrated with larger developments, on standalone sites, or linked to placemaking?</i></p> <ul style="list-style-type: none"> • Last option – give them the space to develop better ideas.
13)	<p><i>What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?</i></p> <ul style="list-style-type: none"> • Student accommodation takes away from local available housing. More designated built to release other homes that are being bought and divided to make profit.
14)	<p><i>What is the level and type of need for gypsy, traveller and travelling show people's accommodation in Medway, and what criteria should be used to identify appropriate sites?</i></p> <ul style="list-style-type: none"> • Made available by being near to major roads – very name gives clue here – 'on the move'

15)	<p><i>Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?</i></p> <ul style="list-style-type: none"> Remove some of the many empty and surplus office blocks and create training areas so skills can be learnt locally. Encourage more affordable training opportunities for long term trades such as gas, water, plumbing and the like. Too little money is offered as a salary during training at present – can get more on the dole for most when considering travel costs from rural areas.
16)	<p><i>What are the opportunities for further business growth in and close to town centres in Medway?</i></p> <ul style="list-style-type: none"> Improve access to all areas, supply concessionary shuttle to rural areas. Many work from home due to poor road/rail – hence commuter coaches.
17)	<p><i>Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?</i></p> <ul style="list-style-type: none"> Seems reasonable assumption – shame the comments say ‘we’ are unskilled in many areas.
18)	<p><i>How can Medway realise opportunities to capitalise on growth in the wider area, including London?</i></p> <ul style="list-style-type: none"> Convince many – cheaper to operate from Medway – especially if staff comes from here – offer better incentives
19)	<p><i>How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?</i></p> <ul style="list-style-type: none"> Encourage more to attend – financial incentives, travel expenses, etc
20)	<p><i>Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?</i></p> <ul style="list-style-type: none"> See Q15 and offer better incentives, etc. see Q16
21)	<p><i>How should the plan address the specific locational requirements of some businesses, for example access to wharves?</i></p> <ul style="list-style-type: none"> Use the river – supply water transport, improve access to other areas on river front via river.
22)	<p><i>What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?</i></p> <ul style="list-style-type: none"> Again – additional student accommodation could be used during summer breaks
23)	<p><i>What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?</i></p> <ul style="list-style-type: none"> Encourage all communities to develop their own heritage/history and assist in publicising, etc. Offer other types of tourism – Archive Centre, special week-end breaks, etc.
24)	<p><i>What role does the river and Medway’s countryside have to play in developing tourism locally?</i></p> <ul style="list-style-type: none"> Develop further areas of river and coast and give better transport access to all – road, rail or river

25)	<p><i>Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?</i></p> <ul style="list-style-type: none"> • No – it is scruffy and acts of threatening behaviour, anti-social behaviour and similar need to be addressed. Encourage more shops and less out-of-town centres. Rochester mainly caters for tourists not so much for local residents (no food shop to speak of)
26)	<p><i>Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?</i></p> <ul style="list-style-type: none"> • See answer to Q29 below
27)	<p><i>27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?</i></p> <ul style="list-style-type: none"> • See answer to Q29 below
28)	<p><i>Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go?</i></p> <ul style="list-style-type: none"> • See answer to Q29 below
29)	<p><i>What should our approach be to proposals for new or enhanced out of town retail?</i></p> <ul style="list-style-type: none"> • Strood has more excellent choice in regard to food shops (in fact excessive choice); parking is nearby, usually sufficient and well lit • Hoo Peninsula various small village shops but needs its own supermarket/clothes outlet. Travel to other places for essentials is costly and that money could be saved for home basics. Won't help Medway Towns but would be greatly appreciated by those on the Peninsula counting their pennies • For much of the Peninsula – leisure requires costly travel again to access what is on offer, public transport stops too early for night time cinema, shopping and the like • No more out of town outlets passed Strood – keep the shoppers in Medway
30)	<p><i>What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?</i></p> <ul style="list-style-type: none"> • Keep the green belt green – find other areas for commercial/residential use because once it's gone – it's gone • Encourage residents and local groups to retain and maintain their special places and help them to develop them for others to visit • Local people with local knowledge of their environment should not be ignored
31)	<p><i>What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?</i></p> <ul style="list-style-type: none"> • The Hoo Peninsula should remain very much a green belt landscape with tourists and visitors bringing much needed economic growth to small businesses – help don't hinder.

32)	<p><i>What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?</i></p> <ul style="list-style-type: none"> Ask the residents what they want in a green belt area and they say green! Advice and guidance on maintaining and developing these spaces should be priority.
33)	<p><i>What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?</i></p> <ul style="list-style-type: none"> Make a record of all available Heritage areas known by Medway Council, then forward to Parish Councils and ask if you have missed any and how these too can be developed/added to enhance
34)	<p><i>What characteristics do you think makes a good place to live?</i></p> <ul style="list-style-type: none"> Must include good access for all. Show interest in past, present and future
35)	<p><i>What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development?</i></p> <ul style="list-style-type: none"> Much is known and publicised about Medway Towns – not so much about rural areas and need to secure before any new developments are considered.
36)	<p><i>What areas of Medway have weaker character and what are the opportunities for improvements?</i></p> <ul style="list-style-type: none"> Again – good access to local heritage sites and areas. Somewhere to park nearby. In many cases long walks involved due to road access and other transport issues.
37)	<p><i>What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?</i></p> <ul style="list-style-type: none"> New developments should enhance area not destroy it! Should include names of interest to keep included in heritage and history
38)	<p><i>How should the role of Hoo St Werburgh as a service centre be developed?</i></p> <ul style="list-style-type: none"> Hoo St Werburgh is now choked and should not be classed as a service centre as many essential services are no longer available due to excess housing development i.e. no bank, PO now in a small super market, no cinema, major shopping area, clothes shop
39)	<p><i>What provision needs to be made for employment in rural Medway?</i></p> <ul style="list-style-type: none"> Better transport links including rail, better road access to all areas for those who would work from home. Encourage all employers to use local labour force when ever possible, train local labour force in necessary skills. Improve broadband and Wi-Fi connections for those working from home.
40)	<p><i>How should the Local Plan address the need to maintain and improve access to services in rural areas?</i></p> <ul style="list-style-type: none"> Hoo St Werburgh is no longer a village as continues to expand. Facilities are being lost as many have to travel to Medway Towns as can't be sourced locally. All that does exist on the Peninsula is stretched to the limit.

41)	<p><i>What consideration should be given to strategic infrastructure and development in rural Medway?</i></p> <ul style="list-style-type: none"> • More houses – after improvements in roads, add rail links, improve water, sewage, electrical and gas supplies all of which are affected by each new development. It won't be able to cope much longer.
42)	<p><i>How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?</i></p> <ul style="list-style-type: none"> • Rural means rural! Use fields to grow some of our food – we import too much. Encourage farmers to expand not pay them to reduce. • Good access to villages and they should have as many residents want to live in villages and should be encouraged to stay as reply on parents/grandparents for childcare as none locally and too expensive. • Don't send people to rural communities who have no idea of the concept. • Small build of homes made available to local community and families would be a real boon to economy as would enable many to stay at work. Many leave due to school age children needing to access schools and colleges, etc.
43)	<p><i>What changes to the built environment could facilitate healthier communities?</i></p> <ul style="list-style-type: none"> • Again – better access, involve communities in planned events and encourage/assist to attend
44)	<p><i>How can the Local Plan encourage access to healthy food options and growing opportunities?</i></p> <ul style="list-style-type: none"> • Rural areas need better shops; local doctors need expanding and better health care available. Over an hour to get to Medway Maritime and also requires change of bus. • Get hospital/doctors to co-ordinate appointment times to assist with use of public transport start and finish times.
45)	<p><i>How can the Local Plan most effectively promote greater physical activity in Medway?</i></p> <ul style="list-style-type: none"> • Open spaces, clinics in community and close by, on regular basis that deal with health and wellbeing. Schools with sports facilities made available outside of school hours – open to all
46)	<p><i>What changes to the current siting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and/or to integrate health services in local communities?</i></p> <ul style="list-style-type: none"> • Demolish Medway Maritime Hospital – after building a new one in an area with better access and updated facilities. Then you can build more houses!
47)	<p><i>How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?</i></p> <ul style="list-style-type: none"> • Don't build houses near schools – give them space to expand buildings and green spaces to encourage development.

48)	<p><i>What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?</i></p> <ul style="list-style-type: none"> Rural areas have none – rely on costly public transport to access what is available and rural buses time tables constantly shifting. Closer facilities should be made available and run by local people – all helps economic growth.
49)	<p><i>Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?</i></p> <ul style="list-style-type: none"> Preserve and maintain
50)	<p><i>Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?</i></p> <ul style="list-style-type: none"> Can't compare – Medway is not big enough
51)	<p><i>Should we move to a multi-functional hub model of provision, and what might this look like in practice?</i></p> <ul style="list-style-type: none"> Continue to maintain and not reduce
52)	<p><i>Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?</i></p> <ul style="list-style-type: none"> Give locals more chance to assist. All new development should have opportunities to access open spaces so a balance
53)	<p><i>What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?</i></p> <ul style="list-style-type: none"> Increase and encourage and give help to communities – invest in apprentices, City & Guilds or other qualification aims. Help our youth to learn to maintain.
54)	<p><i>What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?</i></p> <ul style="list-style-type: none"> See above
55)	<p><i>How should the Local Plan address the aspirations for a new stadium for Gillingham FC?</i></p> <ul style="list-style-type: none"> Encourage use outside of Gillingham FC – use facility for other groups and organisations – encourage additional uses to be created
56)	<p><i>What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?</i></p> <ul style="list-style-type: none"> Equine involves a sport!! Need to encourage farmers locally to make better use of their land. Too much is imported. Create local allotments and other open space growing areas in schools, etc. Once this arable land is lost it can never be re-claimed for food growth. We need our fields so we can eat and breathe.
57)	<p><i>How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?</i></p> <ul style="list-style-type: none"> Latest cars – less emissions already. Keep our open and green spaces to

	offset pollution. Encourage better use of public transport and less reliance on cars. Use trains and rivers instead of lorries.
58)	<i>What approach should be taken to planning for land won minerals in Medway?</i> <ul style="list-style-type: none"> According to this report there are none in Medway at present.
59)	<i>What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?</i> <ul style="list-style-type: none"> If importing 90% how will it be maintained? Will we need 3 wharves in the future as technology improves?
60)	<i>What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?</i> <ul style="list-style-type: none"> Upgrade existing, encourage more recycling and actually recycle – stop storing
61)	<i>What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?</i> <ul style="list-style-type: none"> A good balance between town and country is a big ask.
62)	<i>How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?</i> <ul style="list-style-type: none"> Give them a say – show the options/opportunities/choices/losses
63)	<i>What measures should new development take to mitigate and adapt to the risks posed by climate change?</i> <ul style="list-style-type: none"> Maintain a level of open/ green spaces equality for new developments – they must include these
64)	<i>How can existing development and communities mitigate and adapt to the risks posed by climate change?</i> <ul style="list-style-type: none"> Give them the choices – how they can improve their spaces themselves.
65)	<i>Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?</i> <ul style="list-style-type: none"> Make note of 22.7 in document
66)	<i>How should flood risk and SuDs be taken into account in planning for growth in Medway?</i> <ul style="list-style-type: none"> “Flood Plain” is an obvious clue as to whether or not to build in an area below it! Keep the ditches clear of rubbish on a regular basis and maintain water courses to ensure free flow.
67)	<i>What safeguards should be put in place to ensure future requirements for improved flood defences are not compromised?</i> <ul style="list-style-type: none"> Don’t build where it could cause problems in future – listen to locals and experts in the field.
68)	<i>Should we allocate sites or zones for wind energy development?</i> <ul style="list-style-type: none"> No – wind energy does not appear to be effective or cost efficient for energy produced. Many object to the visual impact on the landscape
69)	<i>What policies should we set for other forms of energy development?</i> <ul style="list-style-type: none"> Recycling items creating energy
70)	<i>How should we take advantage of opportunities for use of waste heat from the large-scale energy generation on the Peninsula?</i>

Chairman: Cllr Mrs V E Cordier, [REDACTED]

	<ul style="list-style-type: none"> Attempts should be made to research this further
71)	<p><i>What infrastructure is required to support Medway's growth over the plan period?</i></p> <ul style="list-style-type: none"> Improve the rail network – bring rural stations and lines back in to public use.
72)	<p><i>What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?</i></p> <ul style="list-style-type: none"> Shuttle services to Hoo to link villages on a regular basis to access services – hardly any cycle lanes on the Peninsula.
73)	<p><i>What provision should be made for car parking?</i></p> <ul style="list-style-type: none"> Unfortunately these are a must to access other areas for work and leisure and are sorely lacking in many places and not enough in others – all are expensive to use when at work for a full day.
74)	<p><i>What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?</i></p> <ul style="list-style-type: none"> These should be developed to give more use of river as an alternative
75)	<p><i>How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?</i></p> <ul style="list-style-type: none"> One is a leisure industry and Rochester Airport needs to be better explained in terms of how it will help locally
76)	<p><i>How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?</i></p> <ul style="list-style-type: none"> Speculate to accumulate? Ensure all communities are given a voice – you might find more answers that way
77)	<p><i>Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?</i></p> <ul style="list-style-type: none"> Yes – rural areas do not have the same facilities and pay more to access them elsewhere.
78)	<p><i>How can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?</i></p> <ul style="list-style-type: none"> See all of the above
79)	<p><i>What use should be made of new methods of delivery to help speed up the planning process, and how can we ensure that quality is not compromised in favour of speed?</i></p> <ul style="list-style-type: none"> Check the Broadband and Wi-Fi in all areas – some people are just not able to connect for any length to research and check plans which can be 100s of pages long + drawings. Give more hard copies to libraries and hubs and allow documents to be taken home – much as a library book but for days rather than weeks so more can see what is planned without restrictions

80)	<i>Are the development principles right? Should other guiding principles be introduced?</i> Yes – in form local residents quicker and give better (not technical) details of gains/losses, etc.
81)	<i>Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?</i> <ul style="list-style-type: none"> • Enable more to 'down size' to take advantage of larger/older properties in need of work
82)	<i>Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?</i> <ul style="list-style-type: none"> • Mixed BUT needs to be affordable – offer Medway Council mortgages!!!
83)	<i>Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?</i> <ul style="list-style-type: none"> • See development at Bells Lane Hoo where no gardens to speak of, no on-road parking but in large public car parks – both make it very hard to sell/find tenants
84)	<i>Should the green belt boundary be reviewed?</i> <ul style="list-style-type: none"> • No
85)	<i>What provision should be made for mixed use in residential developments, both high density and lower density?</i> <ul style="list-style-type: none"> • If some already exist – but otherwise would be difficult to get interest.
86)	<i>What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?</i> <ul style="list-style-type: none"> • Clean it up, make it safer then have another think
87)	<i>Do you agree that the other town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront regeneration sites?</i> <ul style="list-style-type: none"> • Yes – some look very tired and all are in need of more shopping facilities and parking to help this would be a real plus. Cars over houses - difficult!!!

Other comments:

- One hard copy only available at the local library or hub - if there is one near you!
- Size of file causes issues for printing from web
- Too short a consultation period given the limited access to hard copy availability
- No exhibitions at outskirts of rural areas

Yours sincerely

Christine Gurr
Parish Clerk

Chairman: Cllr Mrs V E Cordier, [REDACTED]

Name: John Thorpe

Reference

71

Organisation

On Behalf Of

Type of Consultee

Member of the public

From: [REDACTED]
Sent: 28 February 2016 17:23
To: policy, planning
Subject: Comments on the LOCAL Plan

Follow Up Flag: Follow up
Flag Status: Completed

Mr J.D.Thorpe
[REDACTED]

26th February 2016

My thoughts on the Medway Council Local Plan.

As a mere layman regarding the legalities and general coverage put together in the 113 page consultation document, I do have some experience in retail both in Chatham High Street and in London. Based on this I can perhaps suggest some somewhat radical ideas that may be of some use.

I will comment in phases of how Chatham should look by 2035 and how it most likely will finish up.

1/ Since I arrived to live in Chatham in 1972 I have seen the Princes Park area swallow up fields for housing and although I do not like it, I think the future must include a similar situation in the so called Capstone Valley proposal which in fact as I see it does not actually come against the Capstone Park “Lungs of Chatham” area. It may affect Councillors who live in Hempstead however.

If this went ahead it would need all the expected back up services as well.

With the population increases mentioned something has got to give to house the new residents. I would hope the Chattenden site can be sorted to keep the wildlife safe and include new build to take place too.

A lot more sites will need to be found to contain the 20% projected increase of population as advised in the report, again something has got to give.

2/ To me Chatham will never be a “Tunbridge Wells” or “Canterbury” regarding its population. Rochester being the nearest to that image perhaps but even there a “Dickens” deprivation shows if you look around.

The actual main shopping areas are not really going to change unless a mass demolition and rebuild takes place. A lot of large towns and cities around the country have gone back to the old days but with an updated system of rapid transit trams that is kinder on the environment of course.

Could a tram system be laid along our roads now? I doubt it the traffic problem would never allow it. If pollution levels are to be drastically cut then electric transport is better than “Low Emission” diesel buses.

If trams do not have space perhaps Trolley buses do? Easier to install, fit in with normal traffic generally. The reason they went out of fashion of course was like the trams they have a fixed route. Not all buses would disappear if a diversion needed to take place at times so they could cover during these unfortunate periods. (E.g. Network Rail emergency bus services) Hopefully all Electric buses will supercede the Hybrids though.

Whatever the transport it should be cheap to discourage vehicle use on normal shopping occasions and work of course.

The layout of roads through central Chatham is a disgrace. It is no surprise to me that a newspaper some while ago gave Rochester Bridge area in particular such a bad report regarding air pollution. This is not the only area affected as Luton Road & Arches must rank high too. Your meters mentioned do seem rather sparse in deployment around Medway.

3/With the very high rate of car ownership now this too will add to the problems in future with the higher population. For a river town there are far too few crossing points for vehicles and some relief would occur if a tunnel was put under the river to the Frindsbury Peninsular from the Sun pier area. The depth required could be gained by making it a circular downward access each end. This should not be used by large lorries however.

Another problem is road parking around Medway. Motorists with large enough frontages to their properties should be encouraged to have a drop down pavement and access to get their car off the road. Schemes should be done in the road at the same time by a contractor with a set price making the work far cheaper than the present set up charged by the council. Pay back can be done by instalments to the rate charges for each house over 3-4 years. Reviews of all traffic light systems should also be done to get rid of as many as possible, it is strange how much better the traffic flows on fairly major junctions in Medway when the lights do not work?? Since I have lived in Medway I have seen a great many holdups by new traffic lights on the A2 in particular. All adds to pollution. Pedestrians and cyclists should always have priority though with crossing points

4/ Returning to the main shopping area of Chatham. To me Bluewater can not be challenged nor Hempsted etc but in keeping with normal working folk that walk the streets what would attract a large amount of people to give the shops some chance? I would suggest that the committee involved in the planning, all take a trip to London and see how the main street markets are doing compared with our poorly content balanced ones around Medway.

Markets are in my view still fashionable, they may not be to planners but what would happen if Central Chatham was known throughout the country like Petticoat Lane or Portobello Road etc? Lower the tone? It fits with the local community and you can not make a “Silk Purse out of a Sow’s ear”

Markets are a very sociable occasion. Maidstone’s has been let go to a very low level of late but it is still a regular sociable area. From experience in London I found that retail outlets did not suffer because of markets but picked up a lot more passing trade. Another big draw of course was Flea market and general Bric a Brac and all of this would be ideal in the old bus station area with improved LED lighting of course.

North End Road Fulham is an example of Chatham High Street in London but with traffic too. Councillors will be aware of the Westmoor and Greenfield Bootfairs and the large

amount of people who attend these during the year. Those people would certainly be interested in weekend under cover similar all year round functions in the bus station. Not Bluewater? No, but it would still attract a lot of people if set up right. Car parking charges would be set at the best prices to avoid scaring people away however.

5/ Looking at the consultation document it reminds me of the “Artists Impression” of a proposed new building or area. It does not show the seamier side of life like the dog mess on the pavements, the litter that in Medway seems to be everywhere despite the cleaning staff employed to try and control it, the drunks from all day drinking thanks to licensing hours and outlets out of control and the beggars and thieves that make Chatham high street such a high crime area. These sorts of problems should be included in future plans to be improved. They are out of control now thanks to the splitting up of all the departments that used to patrol and deal out suitable punishment to offenders. So I would suggest that despite the extra costs involved, a department be set up purely to catch and deal with all the inconsiderate and criminal minded people that treat this Medway of ours with such contempt. The police have lost the plot with low budget problems of late I am sorry to say. Pavement parking is another problem together with cycles acting in a dangerous way. The same team could deal with that too, this to operate throughout Medway though and not just the main shopping areas.

I see nothing of late to protect the pedestrian. There are more pedestrian than cyclists and motorists put together and they must be protected. It is not right that because of inconsiderate drivers, Mothers with small children, mobility and wheelchair users etc must venture out into the road and risk their lives. This and the litter problems are of course national but there is nothing to stop a cross party council in Medway setting up an example that the rest of the country can gasp at.

To sum up, I know a lot of the items mentioned fall outside just a local plan for the future but in fact they must be included to make sure all changes are not ruined by the people who just do not care about their surroundings.

Zero tolerance to such activities would soon take effect but ignoring will just let matters grow worse.

Finance for all of this? You have until 2035 to get Government backing or saving up in a fund to get things launched

John Thorpe

Name: Wendy Lane

Reference

72

Organisation

Gravesham Borough Council

On Behalf Of

Type of Consultee

Government/Public Body



Catherine Smith
Planning Manager – Policy
Medway Council

Regeneration and Policy

Ask for: Wendy Lane

Telephone: [REDACTED]

Fax:

Email: [REDACTED]

My ref:

Your ref:

Date: 29 February 2016

Via email only to

planning.policy@medway.gov.uk

Dear Catherine,

Thank you for giving us this opportunity to comment on the Medway Local Plan Issues and Options Consultation. There are three specific issues upon which the Council wants to comment.

Proportionate evidence

As you are aware, the National Planning Policy Framework (NPPF) advises that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The NPPF also advises that local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

The Council values and appreciates Medway Council's approach to informed and evidence-led strategic planning and its provision of a comprehensive and up-to-date evidence base for housing, economy and retail, as provided by the Strategic Housing and Economic Needs Assessment (SHENA), which was jointly commissioned with this Council.

Aim of the Local Plan

Whilst the Consultation document states that the Council is embarking on the plan preparation process with the intention meeting its objectively assessed needs identified for its administrative area, it makes no reference to the needs of the wider housing market area. National Planning Practice Guidance on "Local Plans" advise that the "Local Plan should aim to meet the objectively assessed development and infrastructure needs of the area, including unmet needs of neighbouring areas where this is consistent with policies in the National Planning Policy Framework as a whole".

On 5 June, 2015, Gravesham Council wrote to Medway Council, to explain that due to the constraints of the Green Belt, it may not be possible to identify sufficient land in its boundaries to fully meet its objectively assessed housing need. It went on to state that the opportunity should now be taken to explore whether Medway could help to meet some of Gravesham's housing need and to enter preliminary discussions to this end. Medway agreed to begin discussions and a meeting has been arranged for mid-March 2016.

The document should more accurately state that Medway is embarking on the plan preparation process with the intention, together with Gravesham, of meeting the objectively assessed need

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Website www.gravesham.gov.uk

identified for their joint housing market area. This would meet the Duty to Co-operate requirements, take a co-ordinated approach to housing provision and ensure that strategic issues are effectively addressed in plan preparation without committing the Council to meeting a specific housing number from the outset.

We have highlighted those parts of the consultation document related to this issue in an appendix to this letter.

All reasonable alternatives considered as part of Development Strategy

The Council understand that the document is not a detailed plan, but rather seeks to engage local people, developers and wider stakeholders in assessing what are the best choices for a development strategy for Medway over the next 20 years. To ensure that this is effective, all reasonable alternatives should be considered as part of the development strategy options.

Paragraph 52 of the NPPF recognises that local planning authorities may plan for the supply of new homes through larger scale developments such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. In CLG's recent consultation on proposed changes to national planning policy, the Government is now proposing to strengthen this policy to provide a more supportive approach for new settlements. It considers that local planning authorities should take a proactive approach to planning for new settlements where they can meet sustainable development objectives, including taking account of the need to provide an adequate supply of new homes.

In considering its development strategy options, Medway Council recognises that it is expected to see a significant level of growth over the plan period that is likely to be amongst the highest seen. One of the options put forward for delivering this growth is the concept of freestanding settlements. Indeed, it states that in previous iterations of planning policy for Medway, the provision of a new settlement at Lodge Hill was central to the area's development strategy. This had a capacity of 5,000 dwellings and it remains an option, depending on the outcome of a public inquiry to be held later in 2016 / 2017.

The Council also considers that there may be scope for further freestanding settlements on the Hoo Peninsula as well as scope for smaller freestanding settlements, planned as "garden villages" to accommodate up to 2,000 houses. However, having embraced the concept of new settlements and garden villages, the report overlooks the possibility of larger scale garden cities.

The original Garden City concept envisages settlement of no more than 32,000 people, surrounded by farmland with further growth accommodated in other, linked but separate settlements. Given that the Council is considering the possibilities of new settlements ranging from 2,000 to 5,000 dwellings as well as the expansion of existing settlements on the Hoo Peninsula, there appears to be an opportunity to explore the concept of a Garden City with linked settlements.

In April, 2014, the Government invited local authorities to submit proposals for the development of Garden Cities at or above the 15,000 homes level. This roughly coincides with the original limit of 32,000 people referred to above. Furthermore, Ebbsfleet is being developed as a garden city with a capacity of up to 15,000 dwellings and options for development of a new settlement with this capacity could be explored in Medway.

Shelter's proposal to the Wolfson prize was for an initial 15,000 home settlement at Stoke Harbour and whilst we recognise that this isn't supported locally, it would appear to be a reasonable alternative for further consideration

[https://england.shelter.org.uk/data/assets/pdf_file/0006/840660/Wolfson MMIV Garden City Shelter.pdf](https://england.shelter.org.uk/data/assets/pdf_file/0006/840660/Wolfson_MMIV_Garden_City_Shelter.pdf)

Such an option might provide an opportunity for helping to meet some of need identified for the housing market area, potentially including a component of Gravesham's need.

The Council looks forward to ongoing duty to cooperate discussions at both officer and member level as Medway's Local Plan develops.

Kind regards

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Appendix

Housing

In paragraph 6.1 on the Issues and Options Consultation Document, it is acknowledged that Medway cannot prepare its local plan in isolation but must consider the wider context, to ensure that its policies align with strategic plans and are co-ordinated with those of neighbouring areas.

Paragraph 6.9, notes that the Council is engaged in on-going work with neighbouring planning authorities on cross-boundary matters through the Duty to Cooperate. It then seeks to ensure, in paragraph 6.10, that strategic issues are effectively addressed in the preparation of the new Local Plan.

In paragraph 7.8, it is stated that the Government requires local planning authorities to determine the objectively assessed needs for housing in their strategic housing market areas.

Paragraph 7.9 refers to the Strategic Housing and Economic Needs Assessment (SHENA) and its findings that Medway has complex relationships with a number of neighbouring boroughs and that these could be seen as a basis for a housing market area extending outside the Medway area. However, it does not acknowledge that the SHENA identifies one of these neighbouring boroughs as Gravesham.

Although:

- Medway's acknowledgement that the wider context must be considered in its plan making;
- The Government's requirement for local planning authorities to determine objectively assessed needs for their housing market areas;
- The findings of the SHENA that Medway and Gravesham share a common housing market area and;
- The request from Gravesham that the Councils jointly explore the possibility of some of its housing need being met in Medway,

Paragraph 7.10, states that the Council is embarking on the plan preparation process with the intention meeting its objectively assessed needs identified for its administrative area. It makes no reference to the wider housing market area.

Name: Matthew Girt

Reference

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Organisation

Diocese of Rochester

On Behalf Of

Type of Consultee

Charity/Community/Faith Group

Sent via email: planning.policy@medway.gov.uk

29 February 2016

Dear Sir/Madam,

RESPONSE TO MEDWAY LOCAL PLAN 2012-2035 ISSUES AND OPTIONS PAPER

Thank you for the opportunity to comment on the Issues and Options document. It is **good to be able to have input at this formative stage in the Local Plan's** development. There are specific areas of interest and concern to the Diocese, these include, Chatham town centre, the area of All Saints Chatham, Gillingham, and specifically the Parish of Frindsbury with Upnor and Chattenden which contains the area of the proposed development of Lodge Hill, but we are also interested in the **wider picture, and Medway's strategic development into the future. We recognise the** potential for Medway to become an exciting modern waterfront city, as the document describes, but also recognise the challenges and problems ahead if that vision is to be realised.

In particular, whilst the Diocese, established in 604 AD, is a substantive and long term partner and advocate for Medway, we are concerned that in creating solutions, i.e. putting the plan together, there needs to be a proper and thorough identification and acknowledgement of the issues and problems. We would encourage the Council to take a courageous look at the area and identify what it is that needs addressing in terms of the socio economic challenges. From this it can then identify the framework of policies which enable all partners and parties to build Medway for the future, building on the rich heritage and strengths of the people who are Medway.

The more detailed response below follows the structure of the key themes in the Issues and Options Document and a number of the questions posed in it. This produces a degree of repetition for which we apologise, but trust that by responding in the way indicated this will be a helpful approach.

By way of background our response is informed by three principles, all of which have their basis in Christian values:

- That everyone is equal in the sight of God; and so it is essential to address issues of deprivation, poverty and poor health, and build self-supporting and

cohesive communities

- That everyone should use their talents to the full; so barriers to educational, employment or housing opportunity, for example, should be removed and opportunities for people to enhance their potential encouraged
- That we are responsible for stewardship of the world we have been given, so policies that contribute to tackling climate change and sustainable growth should be encouraged.

KEY THEMES

Vision and Strategic Issues – Questions 1 to 3

We recognise the potential for Medway to become an exciting modern waterfront city, but are dismayed to learn GVA growth in Medway was only 5% between 2001 and 2014, compared to 14% in Kent, which itself has a significantly lower GVA per head than England as a whole.

Given the proximity of Medway to the prosperity of London and the opportunities presented by the Thames Gateway, High Speed 1 (and possibly Crossrail), the Lower Thames Crossing, Ebbsfleet and the potential Paramount Studios development, there is scope for Medway to benefit significantly from future development in the wider **region. However, this will only happen if Medway's growth is well-managed.** The Issues and Options document is set within an emerging Government policy that relaxes planning constraints on development, and this poses significant risks.

We would encourage the Council to have the strongest possible ambition for high quality development and place-making, as it formulates its sustainable growth strategy for Medway, and to use all the levers at its disposal to integrate old and new communities well, providing everyone with better educational, employment, retail and health opportunities.

While we are surprised by the projected 20% increase in the population of Medway over the Plan period (to 2035) we recognise the population of the UK, and particularly that of London and the South East, is set to rise, principally because the number of births will outnumber deaths. It is important we provide for future generations, and for a population that is thankfully living longer, and so we recognise, for example, that the problem of insufficient housing supply needs to be tackled. However, the significant risks of growth need to be approached with thought, care, and well-directed planning policy. We would urge the Council to use its powers to ensure delivery of:

- More sustainable, cohesive and self-supporting communities
- Town centres and villages with good access to community facilities, including the focal point of a Christian place of worship, good schools and health centres

- A pro-active approach to environmental sustainability, including reduced carbon emissions, well-managed access to, and use of, open space, a greater range of local employment opportunities, and more sustainable transport

An omission from the document is consideration of how one of the jewels in the crown of Medway, the Universities at Medway campus, can be harnessed to assist with a number of the issues raised, and how the Local Plan might facilitate that. The Universities bring higher skilled employment into Medway in the professors and lecturers they employ; they train young people and adults to a higher level of educational attainment, including reaching out to those who might otherwise not have accessed higher education, and who in turn can obtain more highly skilled jobs; the growth of the campus if co-ordinated with public transport policy has the potential to contribute to the rejuvenation of Chatham; and more student accommodation has the potential to relieve some housing supply pressure. We would urge the Council to develop planning policies to assist the Universities to expand within Medway, and establish new courses in areas to attract higher added value employment sectors to the area. The opportunity offered by the Universities at Medway is one many urban areas would relish, not just for all of the above reasons, but also as a way to provide education that enables the existing population of Medway. The issue of what education to provide, links to the aspirations and policies for employment sites. Employers will come if there are the locations/sites and the skills in the area. We address our concerns on employment under questions 15 to 21 but urge the council to use all its levers to encourage join up. Again, this is something which would benefit from an analysis of the challenges to Medway and allow policies to be formed which join the dots and break out of the silos of subject specific policies which fail to address the dependencies of all the subjects being consulted upon.

HOUSING - Questions 4 to 14

The challenge for Medway Council of 30,000 new homes by 2035 is a significant one, and one that will need to be dependent on significant areas for development being appropriately brought forward. Small scale suburban expansion and infill will not suffice. Town centres such as Chatham should also be an alternative focus from Gillingham for the expansion of student housing as a means of new accommodation to take the pressure of the private rental market as well as driving renewal in Chatham town centre. The appropriate housing market area for Medway should be one that offers high-quality housing at all levels of affordability and tenure. If the Council is to attract new, higher skilled employment sectors it will need to provide a supply of larger owner-occupied housing, as well as a significantly greater supply of affordable housing, starter homes, student housing, and housing for people with special needs. While we recognise the growth of the private rented sector in Medway we see this as a consequence of housing supply problems rather than a lifestyle choice, so would also support building affordable homes for sale and intermediate forms of tenure (part-rent, part ownership). The many and frequent issues relating to poor treatment of tenants by slum landlords is on the increase, particularly in

Gillingham and Chatham. We would encourage the Council to use all the levers at its disposal to enforce proper standards and operation on private landlords, specifically in the areas of over occupancy, and 'tenant stacking'. We welcome self-and custom-built developments but consider they will make a modest contribution to increased housing supply.

The first season of the Medway Winter Night shelter in which the churches have played a central and leading part has shown the huge shortage of homes for the most vulnerable in society – especially those with mental health or educational difficulties, in particular those who need assistance with every-day living. There is an especial shortage for those leaving hospital which has a knock on impact at Medway Hospital.

Of equal importance is the question of how better quality housing (of whatever affordability) is to be secured. We would urge the Council to:

- Be strong advocates and practitioners in community place-making, using the levers of any land ownership they have, development briefs and design codes to ensure high quality built development
- Encourage developers to use the techniques of design review at an early stage in their planning
- Use the Building for Life criteria to ensure homes are built that will be suitable for people as they age

The Council should consider delivering housing development on its own land, either directly or as a joint venture with others, so as to set the standard expected.

ECONOMY – Questions 15 to 21

In line with the principles of sustainable development we support the creation of employment sites in or close to existing communities and town centres, including Lodge Hill if it goes ahead, and are concerned the SHENA analysis looks more closely at existing demand for employment space, with its emphasis on industrial and warehousing uses, rather than considering how to adjust employment planning policy so as to encourage new higher valued sectors to locate to Medway. However, **we do support the Council's bid for Enterprise zone status for the area around the Rochester Innovation Centre.**

As set out above the Universities at Medway development together with MidKent College provide the opportunity to employ and train Medway people in higher skills, and prepare them for new employment sectors. The employment strategy should encourage expansion, and be linked to a strategic dialogue between the Council and the Universities/College about their expansion plans as well as with local and potential employers on how to exploit the skills on offer.

The Council mentions a number of areas where (hesitantly) office use might be developed, but does not consider how the office stock in Chatham could be renewed so as to build footfall in the centre from workers. We would urge the council to consider what policies it could use to improve the office accommodation offer in Chatham. There are many examples around the country of where failing city centres have been rejuvenated by increased footfall of workers. It would seem a great opportunity to partner with other areas, as Medway has in the past, to attract funding to support this drive.

Medway City Estate lies in the parish of Frindsbury with Upnor and Chattenden and we are interested in the suggestion that the estate could be subject to a major renewal programme, but rather for its improved employment potential than for residential development. Since the Estate is one of the major employment sites in Medway we see risks in a wholesale approach but agree that renewal of the development perhaps assisted by use of CPO powers could lead to the introduction of new sectors vital to the future of the local economy, as has been achieved in Gillingham Business Park and would encourage the Council to explore this further. It will also be worth considering the view from Chatham in the plans for this estate. If the vision of a vibrant waterfront city is to be achieved the view from the waterside at Chatham of Medway City Estate will need to be significantly enhanced.

We are conscious of the London Gateway port development across the River Thames **from Medway, and while on one level this might seem a threat to Medway's** existing wharves and port, it may in fact offer the opportunity for collaboration and complementarity. We would encourage the Council to have a dialogue with Dubai Ports to see if such complementarity exists and if it does adjust planning policies to suit. Otherwise the scope for employment from riverside uses is likely to be limited to the leisure sector (which is still important).

Across Medway the issue of low and varied hours employment is having a significant effect on all other areas of life. The link between opportunities for training and education, attracting, developing and nurturing new employers and skilled workers is **proven, but it doesn't seem that** research has been undertaken to see how this can be resolved. How are our public services from schools to health care to develop and attract skilled employees when the housing stock, training opportunities etc. mitigate against it?

TOURISM - Questions 22-24

We have no comments to make on this section other than to mention the significance and central place of Rochester Cathedral around which Rochester was founded to the tourism offer in Medway and to encourage the Council to continue to use its planning policies to facilitate a good heritage and tourism partnership with the Diocese and Cathedral of Rochester.

RETAIL AND TOWN CENTRES - Questions 25-30

We recognise the retail offer in much of Medway, in particular for comparison shopping, is hampered by the draw of Bluewater, but believe there is scope to strengthen the offer, by a pro-active approach and as a result of growth. The different approaches taken over many years to the retail centres in north Kent has created very different shopping experiences. It is unclear from the consultation document what the strategy is for Chatham, what it is aiming at becoming, who it is there to serve, and how. Chatham has a significant history and a number of significant buildings which remain from its more prosperous and busy past. The Diocese of Rochester is in discussion with Medway Council over its current plans for improvement of the railway station to bus station axis. This approach is the beginning of a coherent approach to increase footfall and improve the environment in which to draw businesses and office use. A central part of this plan should be the historic Waterloo church of St John the Divine. The Council are adopting the use of the name of **St John's Square** around the northern end of the church which we very much encourage and have sponsored. **St John's offers, in its situation surrounded by** open sites of council owned car parks the opportunity to create something akin to St Martins in the Field by Trafalgar Square, or open space near St Pancras station. The re ordering of the road network in the town centre and the removal of the Sir John Hawkins flyover has opened up the possibility of opening St Johns again, and creating a real feature of quality with the town centre. Increasing the population of the town and reversing decades of decline offer a way of improving Chatham town centre. This can be achieved by the building out of the regeneration sites of Chatham Waterfront and Rochester Riverside; by bringing more housing back to the centre of Chatham including some above shops, by encouragement of a stronger offer to students from the Universities at Medway campus, and by population growth more broadly. In order to encourage student patronage of Chatham town centre we would advocate the building of a safer pedestrian and cycle route from Chatham Maritime to Chatham Town Centre through the Historic Dockyard. Simple town centre management methods of encouraging traders to give student discounts would create a draw which at present does not exist. These and other methods have been trialled in other town centres and successfully integrate new and existing populations.

The Diocese recently conducted some limited town centre consultations with permission from the Council to understand Chatham and how people visit and use it. We shared these with Council officers. What is striking is the apparent high level of footfall and the many, many nationalities who call Chatham home. There appears no policy which is making the most of this opportunity, but rather a reluctance to engage with the subject. Many of the migrants, new and relatively new arrivals to Chatham are keen to contribute to their new home, and many have skills to offer which would benefit the local economy.

Chatham, whilst offering a good mix of a certain value level of retail offer has suffered in the last two months from an increase in closures of stores, and before this, the significant loss of the food retailer, Tesco. The impact of the loss of a significant food offer has not only hit **Chatham's** ranking in retail centres, more

importantly it has hurt many local peoples quality of life. A significantly high proportion of Chatham residents walk to the centre of Chatham, and now have a much more limited set of options for food, and also clothing which was offered by the supermarket. There is significant demand economically for a good sized food retailer, and more importantly, there is a need for people to be able to access one. With the ex-Tesco store now reopening as a camping shop we would encourage the Council to actively search for and prioritise the securing of a new food store for Chatham.

The significant length of Chatham's high street also mitigates against a focus area.

With the significant changes to retail that have taken place, and will take place across the UK, it may be more productive to look at effectively shortening the high street and generating a new residential population in and around the core high street offer, allowing more competition for the retail space.

We think all the town centres of Medway could be bolstered by the provision of health centres, containing GP practices, dentists, chiropody and similar services, a pharmacy and a council-provided fitness suite in the centres themselves. Again this point demonstrates the link between employment, training, housing and provision of services. They are not silos, and an approach which understands the cross linkages and fertilisation needs to be done.

There is significant emphasis on Chatham within the plan and less about Gillingham. The improved rail link has increased interest and access to Gillingham, but unlike Chatham, Gillingham doesn't **have the same focal point** and receives very little mention in the plan. The increasing mix of housing tenures in Gillingham has been marked with notable increases in student and new immigrant **community's** cheek by jowl with the established communities of Gillingham. The welcome expansion of the Universities at Medway campus is creating a significant student demand for housing over and above that provided specifically for students. The opportunity created by the skills, interests and income provided by new students is not captured and the plan shows no recognition of the opportunity, or its relationship to future employment space, or housing demands.

We support an improved supermarket offer in Gillingham and policies to improve connectivity between Strood High Street and Strood Retail Park. We commend the offer of St Nicholas Strood at the heart of the town centre and encourage the Council to work with the local church parish as a focal point for the centre of Strood.

Local centres do not appear from the consultation to be a focus for the plan which would appear at odds when other elements of the plan are looking at creating central hubs in new communities. Twydall is a case in point of a strong community with a local parade with increasing vacancies. With a refocusing of major centres like Chatham and Gillingham around residential and fewer but higher quality retail offers, opportunities could be made for better use of community focused retail offers such

as local delivery centres for internet shopping, or local non retail office employment locations, both of which would give new footfall to increasingly outmoded retail locations.

ENVIRONMENT -Questions 30-32

We recognise that Medway offers some stunning landscapes as well as sites of wildlife habitat of national and international significance. For example, the church of All Saints Frindsbury has a commanding view of the Medway estuary as it passes from Cuxton through Strood and Rochester onwards to Chatham-a view we would not want to lose. In this context it is important development is managed sensitively and these strategic assets are supported for active community use as well as wildlife preservation. Where development happens we consider it should be in relatively higher density development so as to reduce land-take, and facilitate the provision of community facilities: churches, schools, shops, health centres, ensuring they can be accessed on foot or by cycle where possible. We support improved access to the river Medway for promoting leisure and active lifestyles.

BUILT ENVIRONMENT - Questions 33 to 37

We consider regeneration is best done by building the future of a place from its past, **and therefore support the conservation and maintenance of Medway's distinctive** heritage assets including its churches and cathedral. Heritage can then provide a distinctive character that avoids all regenerated sites looking similar. Nevertheless there are parts of Medway where the urban fabric is tired or indeed poor, and we would encourage the Council to develop wider scale renewal strategies for areas where this is true. Many of the urban areas of Medway face significantly similar pressures to the outer areas of London. The Church of England has significant experience, held within the Diocese of Rochester which covers parts of London, of engaging with these areas and enabling renewal. A particular example is the work and investment of the Church in Tottenham following the riots. We would urge the Council to engage with the Diocese for the renewal of tired urban areas.

We would encourage a cooperative working on the issue of heritage assets that allows them to be used for community benefit. Particularly with regard to churches and planning, it would be very helpful to be able to have an open dialogue which sees churches as more than just buildings of historic interest, but also as a building that has current social as well as spiritual benefit, in partnership with the Council and other local organisations.

There is a real risk with housing growth under a relaxed planning regime that in the next generation we look back on a new phase of poor urban fabric development. These risks can be avoided or mitigated by use of:

- Clear development briefs from the Council
- Publication of design codes

- An expectation that developers will submit their plans to a design review process
- Encouraging development that designs out crime, and encourages Building for Life

We commend all these to the Council and encourage it to use the other levers it has **(such as ownership of 'ransom' strips)** and partnerships with other significant players, to ensure the highest quality of built environment.

RURAL AREAS – Questions 38-42

Conditionally we support the development of the villages of the Hoo peninsula, including the development of Lodge Hill, where they help provide stronger more cohesive communities with access to good schools, health and community facilities including a church. In the case of development at Lodge Hill we would strongly encourage the Council to enable the repositioning of Bishop Gundulf Church at the centre and heart of the community. A new church and community centre would do much to provide continuity and cohesion for an emerging new community in a development at Lodge Hill. We are opposed to housing development in the rural areas (or anywhere) that is mono-tenure or built without consideration to good place-making.

INFRASTRUCTURE AND SERVICES, COMMUNITY FACILITIES – including health, education, places of worship, open space and sport - Questions 43-55

Healthcare is, with housing, one of the biggest problems we face. Medway hospital with its role covering Medway and Swale is under considerable pressure in terms of space and ability to serve the changing needs of communities. A particular pinch point is rehabilitation and long term nursing facilities to move people into. We would encourage the Council to use the opportunity presented to do a fundamental review of the requirements for health care that are being sought to be provided at the hospital site, and whether there are better and more effective ways of delivering its care. This should take the form of a radical and urgent review. This would be to the benefit of those receiving care, those supporting people in care, staff and the local community.

Health and well-being are significant issues for Medway as for much of the UK, particularly in terms of social isolation and social cohesion. Local investment in programmes which increase contact in communities a particularly good example was the **'Healthy Twydall' model** which saw the Council facilitating links between local groups working together for the benefit of the community. It was a pity that not long after spearheading this work the Council closed the project. With increasing pressure on Council budgets and resources it is imperative the Council finds innovative ways to invest up front to reduce the downstream costs of increased occupancy of hospital/care spaces by motivating and keeping people within their communities.

The statistics in relation to educational attainment and health outcomes in Medway are of such cause for concern that we would urge the council to make improved schools and health facilities a central rather than a peripheral concern of the Local Plan. Sustainable development of Medway is not achievable unless these significant underlying causes of deprivation are tackled.

Schools' planning is we recognise more difficult in these days of Academies and Free schools but we would urge the Council to exert its planning influence to improve school standards and educational attainment. The church considers the selective education system in Kent and Medway does not assist the provision of equal educational opportunity for all, but recognises this policy is beyond the scope of the Local Plan to influence.

We would therefore urge the Council to consider the role Church schools can play in improving standards, and building communities that are self-supporting and values-based. We would encourage the Council to maintain a strategic dialogue with the Diocese of Rochester on the part Church of England Schools can play when seeking to build sustainable communities.

As the number of primary school places continues to increase, we would expect that the number of Church of England school places would increase to ensure the proportion of Church of England school places across the LA is maintained.

We are concerned to see it is still true that Medway has a significant number of single-handed GP practitioners, and would encourage planning policies that encourage town and village-centred health facilities (with doctors, dentists, pharmacists and other practitioners based together, ideally with fitness facilities too).

Churches are an important focal point for communities, and as the document describes often offer a range of community activities in church or parish halls. We would urge the Council to give central importance to the provision on Christian places of worship in new communities, and see conversations with the Diocese as a first stop rather than a back stop. The Church of England has throughout its history been committed to building communities, and has over the last 15 years been pioneering new sustainable responses to building new communities, including the investment in and provision of new churches in new places. Key in this is the early provision of first stage community facilities. Churches are uniquely placed to deliver this with current examples of the Engine Room, Tottenham Hale in London, and St Peters, Stonegrove, London being just two. We would urge the council to begin a strategic conversation with the Diocese of Rochester about how to plan in and deliver new community resources for new communities.

Medway Park is a sports complex provided to a very high standard, and operating in conjunction with the Universities of Medway. It is already host to some events of regional and even national scale. The Local Plan could consider how this facility

might be further enhanced so as to attract residents to the area and provide new employment opportunities in the sports development and health sectors.

NATURAL RESOURCES - Agricultural Land - No Comments

AIR QUALITY - Question 57

The problems of air pollution described in the document are a serious cause for concern particularly in central Medway with its potential for an increased number of households living in areas of high nitrous oxide. The Local Plan could address these issues in part by adoption of a more sustainable transport policy facilitating cheaper bus services and increased cycling and walking, discouraging car use through key housing areas, and encouraging buses running on green energy, including electric buses, (such as some of those now operating in London).

MINERALS - No Comments

WASTE - Question 60

We are encouraged to see recycling in Medway is now at 42%, although there is clearly considerable room for improvement. We support continued reduction of waste transported to landfill, and waste management and landfill taking place within Medway.

SUSTAINABILITY, CLIMATE CHANGE, ENERGY, TRANSPORT AND FLOOD RISK - Questions 60-75

The good stewardship of the Earth's resources is a key objective for the Church. Sustainable development should in our view mean development that does not **continue to exhaust the Earth's resources, but instead maximises the use of** renewable technologies, supports energy efficiency, uses existing, and develops new forms of, carbon sinks, and takes a pro-active approach to flood risk, using Sustainable Urban Drainage Schemes (SUDS) in new development areas. One of the **key objectives of the Council's strategies for housing and employment development** should be to generate more opportunities for local people to obtain higher skilled employment in Medway, thus reducing the need for out-commuting, improving the viability of the local retail offer, and reducing carbon emissions.

Public transport, and in particular buses, are very expensive in Medway. A sustainable transport strategy would involve policies to discourage car use in the urban centres, improve the frequency and reduce the costs of buses, encourage cycling and walking and encourage public transport operators to adopter green technologies.

We support the establishment of a zone for wind energy development and would strongly advocate support for use of waste heat from large-scale energy generation

on the Hoo Peninsula. District heating schemes should be evaluated in higher density town centre development also.

Two specifics we would encourage are to establish a cycle path through the Historic Dockyard into Chatham; and finding a way to enable cyclists and pedestrians to cross the Medway through or close to the Medway tunnel.

Churches have an important part to play in the drive for sustainable growth, and while accepting that many churches have high heritage value we consider the council should work with Heritage England and church authorities to accept a higher proportion of approvals for sustainable technology use by churches.

DELIVERABILITY - Questions 76-79

We would support the Council developing a Community Infrastructure Levy approach to development rather than the use of individual S.106 developments, as CIL provides a more transparent approach and allows infrastructure to be built in order of priority rather than in terms of what can be secured from an individual development. That said, it is true the viability of different parts of Medway differs, and we would support a differential approach to the tariff in the CIL providing this did not lead to areas with lower viability benefitting less from new infrastructure, which we feel should be based on need. However, we do not consider the Council should shrink from imposing requirements for the provision of good design, adequate open space or water efficiency standards, as the consequences of letting these standards fall will result in further problems and higher costs later on.

DEVELOPMENT STRATEGY - Questions 80 to 87

We are disappointed to hear the Public Inquiry for Lodge Hill has been postponed and that uncertainty around this development continues. Of the options set out for growth in the document we consider that if done well the development of Lodge Hill can not only meet the need for a significant proportion of the housing supply issues in Medway it will also provide the much needed community infrastructure to improve the quality of life for the existing community of Chattenden.

The alternatives to development at Lodge Hill within the Hoo peninsula would appear to include equally complex sites including some with greater national and international designations than Lodge Hill; although some development of Hoo St Werburgh to increase its role as a centre for the whole peninsula has some scope.

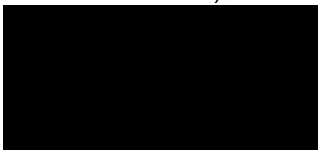
We support the development principles set out in paragraph 27.8 of the document and consider higher-density town centre and riverside development accompanied by freestanding new settlements like Lodge Hill to be preferable to incremental suburban development. An urban extension between Frindsbury and Chattenden may have some merit in planning terms, but is likely to be strongly resisted by the local community. We would not support development of major employment sites like

the Medway City Estate for residential use, unless sites of equal or greater employment use had **already** been provided elsewhere.

Mixed use development should continue to be encouraged so as to build more sustainable and cohesive communities. Increased residential accommodation provided within Chatham Town Centre would help restore its role. In the long run redevelopment of the previous Civic Centre site in Strood may provide the opportunity to re-think Strood Town Centre. It is clear that retail has significantly changed over the past ten years, and will continue to alter in terms of mix and as a proportion of activity in town centres nationally and consequently within Medway.

We hope these comments are helpful and will be taken fully into account as the Local Plan develops.

Yours sincerely,



Matthew Girt MA (TP) FRSA
Director of Strategy & Implementation

Cc: The Bishop of Rochester
Archdeacon of Rochester
Diocesan Secretary
Director of Education, Diocesan Board of Education
Diocesan Agents

Name: Mark Wrigley

Reference

74

Organisation

The Crown Estate

On Behalf Of

Type of Consultee

Developer/Consultant

From: [REDACTED]
Sent: 29 February 2016 11:13
To: policy, planning
Subject: Consultation on Medway's new Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

We appreciate the opportunity to provide comments on this draft, and we hope that you will be able to take our comments into account.

We have published our third (2015) Marine Aggregates Capability and Portfolio report which can be found at

<http://www.thecrownestate.co.uk/media/389767/ei-marine-aggregates-capability-and-portfolio.pdf>

We would highlight the reserve figures for marine aggregates in this report, which indicate the 3 main regions which supply London and the Thames Estuary (East Coast, Thames Estuary and East English Channel) have a total current primary (construction) aggregate reserve of 224.86 million tonnes, with a reserve life based on the 10 year average extraction of 29.33 years.

The Crown Estate is currently undertaking a major strategic study about the potential for consolidating marine aggregate wharf operations into single regional aggregate hubs. As major markets for marine aggregates the south coast, and London have both been identified for feasibility studies which are currently on-going. The concept being studied is the establishment of a single major regional wharf with road, rail and barge distribution facilities which could introduce improved economies of scale, operational efficiencies and growth potential.

Please find below our specific comments on the Issues and Options Consultation Document.

1.2 and 4.4 – It is recognised that population growth is central to this plan, which will increase the need for housing and infrastructure. Marine aggregates are well placed to meet this increased need.

6.8 - We agree that minerals and waste issues often affect a wider area.

8.13 – We agree that Kingsnorth and Isle of Grain are areas for land intensive heavy industry, and would therefore be unlikely to be suitable areas for housing development.

8.25 – It is recognised that housing is a potential competition to industry and that the Government is relaxing planning controls safeguarding employment land. We would like to highlight the importance of wharf safeguarding. As stated in the NPPF, when preparing Local Plans, local planning authorities should safeguard existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials;

20.4 – We support that statement that Medways wharves make an important contribution to the importation of crushed rock and marine dredged aggregates.

23.2 - We agree new developments in tidal flood areas will require adequate flood defences. Marine aggregates can play a key role in coastal adaptation by providing large volumes of material.

23.4 - We agree that a consequence of rising sea levels is coastal squeeze. The Crown Estate is currently undertaking a project into researching potential habitat creation opportunities.

Mark Wrigley
Minerals Asset Manager



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The Crown Estate's head office is at 16 New Burlington Place London W1S 2HX

Name: Paul Watson

Reference

75

Organisation

Phillips Planning Service Ltd

On Behalf Of

Estates strategic Land Limited

Type of Consultee

Developer/Consultant

Medway Local Plan 2012 – 2035

Issues & Options Consultation

(February 2016)

Response on behalf of Cooper Estates Strategic Land Limited

1. The Issues & Options consultation paper makes clear that:

“1.2 The document does not set out detailed policies or identify specific sites for development. Rather, it presents key contextual matters that will be the drivers for the new Local Plan.....

1.4 The document raises questions on the most appropriate approaches and locations for supporting sustainable growth in Medway

1.5 The Issues and Options consultation also invites stakeholders to consider potential approaches that could be taken to a development strategy for the new Local Plan. These include:

- ☐ *high density town centre and riverside development,*
- ☐ *incremental suburban development,*
- ☐ *planned growth of existing settlements,*
- ☐ *freestanding settlements,*
- ☐ *urban extensions’*
- ☐ *role of custom and self build housing, and*
- ☐ *approaches to the town centres”*

2. The consultation paper seeks responses to a number of set questions regarding the overall vision for the plan, strategic issues, housing growth and general locations for future development. This response paper addresses these specific questions. It is understood that opportunities to promote individual sites for development will be provided in forthcoming rounds of consultation.
3. Our response to a number of the questions posed in the paper are provided below.

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

4. It is considered that there are three key components which should be included in the vision.
5. Firstly the consultation document sets out how current household projections estimate that the population of Medway is set to increase by 20% over the plan period.
6. It is clear therefore that the need to provide sufficient housing and so meet the aspirations of the expanding population, to have access to high quality housing, should be central to the plans vision.
7. This should include the aim that new housing which is provided be located in locations where people actually want to live and be of a type that meets the varied needs of a diverse population.
8. Secondly and alongside the drive to provide new housing it is of course necessary to ensure that the plan provides for economic success and puts in place policies which will deliver jobs for the growing population.
9. Thirdly, with new homes and new employment opportunities comes the need to ensure that the districts infrastructure, for example, roads, public transport, schools, health centres and other community facilities are provided to service the expansion. The need to maintain Chatham as a key retail centre is also of importance and should be included in the vision.

2) What do you think are the strategic issues that the Local Plan needs to address &

3) How should the council respond to these issues

10. Medway occupies a strategically important location, close to London and neighbouring authorities which are substantially constrained by the metropolitan Green Belt.
11. A strategic issue for Medway is its relationship with London and these neighbouring authorities in terms of future growth needs i.e. pressure to accommodate development from outside Medway but which cannot reasonably be accommodated at the point where it is generated.
12. The Issues and Options paper notes Medway's 'duty to co-operate' with its neighbours and that this will be an ongoing process as part of the plans preparation.
13. It is submitted that Medway should respond positively to this challenge and seek to accommodate growth in locations which are unconstrained by significant landscape or environmental constraints, particularly in and around the key town of Chatham.

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period? &

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

14. The OAN figure suggested in the Issues and Options paper is 29,463. Within this overall figure the SHMA suggests that there is a need to deliver 17,112 affordable homes over the plan period.
15. Delivery of 17,112 affordable homes out of a total of 29,463 would suggest that if the full affordable needs are to be met, the Council would need to seek affordable housing provision at a rate of 58%.
16. Clearly as set out in the Issues and Options Paper any affordable housing target would need to be viable and a rate of 25% is suggested as reasonable in viability terms i.e. far removed from 58%.
17. However, at a rate of 25% the Council would only deliver up to 7,366 affordable homes in the plan period. This is 9,746 fewer than the identified need even if full provision is secured on all sites which seems unlikely as there will no doubt be viability arguments which are accepted in certain cases.
18. Given the guidance set out in the NPPF regarding the need to boost significantly the supply of housing and in particular affordable housing it is suggested that the Council should consider an up-lift in the total figure to reflect a desire to deliver more affordable homes. Whilst it may be unrealistic to seek to deliver the full assessed affordable housing needs, an increase in the overall figure of for example of 4,000 would deliver an extra 1,000 affordable units.
19. In summary, the OAN figure of 29,463 may be considered a 'policy off' figure but when the consideration of affordable housing need is added in the figure should be increased.

7) What form of housing best meets the needs of Medway's growing population of older people? &

8) What housing is needed for other specific groups in Medway?

20. The needs of the older population are diverse and it would be inappropriate to simply suggest one form of housing as catering for all.
21. As with all forms of housing a choice of style and types of units is most appropriate. Some members of the older population will look for low maintenance properties, perhaps managed or serviced apartments with small or no gardens, close to shops and facilities whilst others wish to retain more traditional living environments provided these are adaptable and so respond to changing circumstances and levels of health.
22. It is considered that a range of general market housing should be provided including higher density urban sites to suburban expansions of the key towns and smaller scale developments within the lower order settlements.
23. The key to delivery of new housing is to provide choice and so competition in the market.

25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

24. The Issues and option paper suggests that Chatham is under performing as a retail centre (despite being the main centre in Medway), as a result of the competition from Bluewater and Maidstone.
25. Chatham fails to attract a high share of the available spending power from surrounding areas. A high proportion of the retail spend within Chatham comes from existing local residents.
26. The town therefore suffers from a relatively high vacancy rate, particularly above ground floor levels.
27. It is considered that it is appropriate to seek to focus investment and retail capacity in Chatham. However there is a need to be realistic regarding the way in which planning policies control town centre uses. It is inappropriate to simply retain buildings and sites within the retail use class if it's clear that this is not required or unlikely to encourage them to be taken up. Leisure and other destination uses can be encouraged to
28. We suggest that if Chatham is to succeed and grow as a retail centre it is important to encourage residential development in the town and breathe life into the area during the evenings and weekends. Given the evidence that Chatham struggles to attract retail customer from further afield, providing this housing in the town will have the effect of delivering a 'captive' audience for the retail offer.

86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?

29. As set out in the Issues & Options Paper, focussing additional residential development and retail floorspace to help strengthen the town centre's historic function as the retail and civic heart of Medway has been the Council's strategy over the past ten years.
30. Although it has been difficult to attract major retailers in recent years, as we set out above, this situation could improve if the concentration of residential development in the town centre increases.
31. The success of this strategy would require the delivery of high-density residential development in the town centre and this strategy is supported.

Name: Jillian Barr

Reference

76

Organisation

CPRE Kent

On Behalf Of

Type of Consultee

Charity/Community/Faith Group



Ms C Smith
Planning Policy
Regeneration, Community and Culture
Medway Council
Gun Wharf
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ME4 4TR

29 February 2016

Dear Ms Smith

Medway Council Local Plan: Issues and Options 2012 - 2035

Thank you for consulting CPRE Kent on the above document.

As a general point, we are pleased to see the Council consulting the Community at this early stage in the preparation of the Medway Council Local Plan.

There are a large number of questions in the document and it has not been possible to respond to each in the time available. CPRE Kent has concentrated on a selection of the questions, but must confirm that the absence of a detailed answer does not infer that the issue is not one of interest to CPRE. CPRE may comment on these elements of the Local Plan as it evolves.

We do have some concern that the necessary background information has not been available until recently to answer a number of key questions. These include the SHENA (and SHMA) and CPRE Kent would welcome the opportunity to finalise our views on housing needs, definition of housing market area and jobs/employment land needs. We are pleased to see that the SHENA and associated documents are now available for comment. These documents are an essential part of the evidence base and need to be reviewed to make any comments on questions 4, 5, 6 and 17 meaningful.

We hope that you will give serious consideration to our representations, and we would be glad to meet and discuss with you our concerns should you find this helpful.

Please keep us informed of progress with these documents, and the further opportunities that will be available to comment.

Yours sincerely,

Jillian Barr

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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CPRE Kent

Comments on Medway Council Local Plan - Issues and Options

Developing a Vision for Medway in 2015

1. What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

The Council is faced with a significant challenge to respond to substantial development targets in a manner that enhances the urban area, improves the well-being of its residents and protects important habitats, productive land, landscapes and settlement gaps. A strong and balanced spatial vision is essential to frame the Plan objectives.

The vision should include references to:

1. Ensuring development is focused on the most sustainable locations so that the best balance is found between the use of natural resources for development and conserving the ecosystem services necessary to well-being, resilience and livelihoods;
2. Focus on regeneration through development of urban sites;
3. Working at a landscape scale to protect and enhance important wildlife habitats and locally valued / distinctive landscapes;
4. Enhancing the urban and rural biodiversity network, while also maximising the physical regeneration and community health benefits of green infrastructure.
5. Protecting the green belt and important gaps between settlements;
6. Recognising the importance of agricultural land to local sustainability and national food security;
7. Recognising the value of tranquillity as an important contributor to health and well-being;
8. Understanding the services essential to our rural communities and allowing appropriate small scale development in the rural areas where this meets local needs and supports long-term sustainability of settlements.

Strategic Issues

2) What do you think are the strategic issues that the Local Plan needs to address?

3) How should the council respond to these issues?

Medway is a densely developed area, and there are clear and significant challenges for meeting development needs in a way that benefits its existing communities and protects what is important about its rural environments. It is notable that the remaining countryside around the Medway urban area (easily accessible to the residents of Medway's urban population) is becoming increasingly scarce. For this reason it is essential to maximise employment, housing, retail and leisure development in urban centres, so that new housing is provided alongside an increasingly prosperous urban economy. Actively prioritising urban regeneration and an attractive urban environment is necessary to ensure that development in the Medway area is sustainable and maximises the benefits to local people.

The Medway Council area benefits from internationally important wildlife sites. As recognised in the consultation document, there is a Strategic Access Mitigation and Management Strategy which (provided mitigation is secured) should ensure growth does not have a significant effect on the North Kent Marshes SPA's and Ramsar sites. It is notable, however, that there have been marked declines in some bird species around the Medway. While it is understood that the SAMMS is not very sensitive to housing numbers, it is important to recognise that the cumulative increase in housing requirements (since the SAMMS was first envisaged) across the whole North Kent Environmental Planning Group area has been substantial. It is the view of CPRE Kent that the North Kent Environmental Planning Group, informed by professional ecological advice, monitoring data and Natural England should collectively confirm that the SAMMS remains a robust strategy to mitigate the impact.

Landscape, and in particular those landscapes designated for their 'wider than local' importance, are strategically important issues for the plan to address. A landscape scale approach to conservation and planning is important to achieve environmental objectives at a landscape scale. Landscape issues, should include consideration of tranquillity and dark skies.

The current local plan also includes Green Belt designation and Strategic Gap. By their very nature these are strategic issues that must be addressed in the Local Plan.

Finally, 'best and most versatile' agricultural land is an issue of strategic importance. At this early stage in the plan-making process it is recommended that a research study on BMV agricultural land is carried out to inform plan-makers and other stakeholders in the Medway Council area about the economic value of the best and most versatile (BMV) land. Swale Borough Council completed a similar piece of work and this has assisted in their decision-making.

Housing

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

In the absence of a final published SHMA, CPRE has not commented in detail on the housing needs calculations, the extent of the housing market area, nor the appropriate level of affordable housing. CPRE would welcome the opportunity to comment on this question when these key pieces of evidence are finalised and become available for scrutiny. In general terms, CPRE notes the ambitious forecasts for employment growth and would argue that the potential for reduced out-commuting, increased economic activity and reduced unemployment, needs to be taken into account. CPRE would be concerned if employment forecasts were having an upward pressure on the housing requirement beyond the demographic projection.

It is not clear in the Issues and Options document whether any household growth scenarios or development strategy options have been subject to Sustainability Appraisal. This should inform the development of the Local Plan and demonstrates the consideration of reasonable alternatives - a specific requirement of SEA legislation.

CPRE queries whether there has been a consultation on the SA Scoping Report?

Clearly environmental constraints are significant in the Medway area and consideration of the proposed SHLAA sites, together with the cumulative impacts of development may result in a conclusion that resultant housing targets need to be constrained. In paragraph 7.10, the Council recognises that the NPPF requires local authorities to meet housing need, but only so far as it is consistent with other policies in the

framework. It should not be used as a proxy for a target, which can only be determined following a proper consideration of environmental and infrastructure constraints, including consideration of the cumulative impact of development.

5) What do you consider to be the appropriate housing market area for Medway?

In the absence of a published SHENA (and SHMA), CPRE has not been able to comment on the Housing Needs calculations, the extent of the housing market area, nor the appropriate level of affordable housing. CPRE would welcome the opportunity to comment on this question when these key pieces of evidence are finalised and become available.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

In terms of affordable housing thresholds, and in the absence of further viability information, CPRE encourages the provision of affordable housing on sites of 5 homes and above. This low threshold is particularly important in rural areas. It would be appropriate, however, to finalise an affordable housing threshold on the completion of a viability assessment and this is somewhat difficult to do accurately at such an early stage in the process. It might be that a variable threshold will be appropriate depending on location.

Economy

17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?

In the absence of a final published SHENA, CPRE has not been able to comment on the jobs and employment land needs identified. There does not appear to be sufficient information for stakeholders to make informed comments at this stage. In the absence of further information, it appears that a jobs growth of 17,200 (21%) seems very ambitious when considering past trends and the need to take proper account of uncertainties associated with major strategic sites and competition expected from neighbouring local authority areas.

While it is of course agreed that the position of Medway within the Thames Gateway offers excellent opportunities for regeneration and investment, it has not yet had the benefits that were anticipated. Unemployment remains above Kent average in Medway, and growth has not been in those industries that provide potential for sustained value added growth. A strong strategy for attracting high value employment growth is required. The potential for reduced out-commuting, increased economic activity and reduced unemployment, needs to be taken into account and CPRE would be concerned if employment forecasts were having an upward pressure on the housing requirement.

20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?

In order to reduce out commuting from the Medway area, a strategy is needed to encourage higher skilled, higher paid employment in the area. Due to the proximity of London, however, there is likely to be a wage gap that would be difficult to resolve and a strong strategy for attracting high value employment growth is required. Protection and enhancement of the Medway environment will be key to attracting high value employers.

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

The plan should seek to safeguard (using Article 4 Directions where appropriate) employment land closely related to wharves, and protect the wharves themselves. Wharves are a diminishing and finite resource and (even if currently underused) may be essential for sustainable transport in the future.

Retail, Commercial, Leisure and Town Centres

25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

Increasing town centre populations, subject to good design and infrastructure provision, should help the vitality and viability of retail centres and local transport hubs. Improving retail market share of Chatham town centre, however, will not simply be achieved by increasing levels of housing. Long term retail trends are very difficult to predict and there is a risk that existing shopping patterns might simply be compounded.

High density urban development in appropriate locations might encourage leisure uses – including food and drink uses that can improve the vitality of the town centre, including the 5-9 economy (increasingly critical to a successful town centre) and night-time economy. Environmental/ public realm enhancements will also assist to encourage local people to use town centres and there may be potential to partly fund these through CIL.

Environment

30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

The substantial wildlife and landscape constraints in the Medway area will mean that development pressure is likely to be focused on land that, despite not having national and international protection, may nevertheless have locally important designations and/or have a significant local value. Urban edge landscapes, for example, can have a special value, cultural relevance and accessibility to local people and it is important that this is not ignored as part of plan-making. It is suggested that a landscape capacity study should be carried out across the area to consider landscape character sensitivity and visual sensitivity of land under development pressure. At the site assessment stage this can be developed further to consider 'value' in more detail in terms of remoteness, tranquillity, cultural association, conservation interests and landscape designations. This landscape focused work assists assessment of the capacity of landscapes to accommodate change.

It is also important, at this stage in the planning process, that local communities are encouraged to identify Local Green Spaces particularly important to them. As stated in the NPPF, this should *'be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services'*.

31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

Green Infrastructure and connectivity for wildlife and people should be an important theme of the Local Plan. Existing and potential green infrastructure should be identified at early stages of plan preparation so that opportunities can be identified and delivered. Key green infrastructure features, such as the Medway Valley, and their contribution to connectivity (leisure, landscape and biodiversity) should be protected and enhanced.

32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

For the most part, existing Areas of Local Landscape Importance and Special Landscape Areas (renamed) should continue to be locally designated in the new plan since their importance and function are accepted. Securing key pieces of valued landscape, green gaps or specific green infrastructure features by designation is an important means by which the Local Plan can protect the environment. The Strategic Gap, as currently designated in the adopted plan, for example, defines and separates existing communities and prevents settlements from merging. This contributes to social and environmental elements of sustainability, by supporting strong and vibrant communities and maintaining a high quality rural environment. Please refer to a recent appeal at Bodkin Farm, Chestfield (APP/J2210/A/14/2227624) where the inspector considered that green gap policies were *'consistent with the NPPF's principle of the different roles and character of different areas (paragraph 17), and its advice that Local Plans should identify land where development would be inappropriate (paragraph 157)'*.

Built Environment

33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

Successful regeneration must have a lasting effect on places and communities that live in them. By creating a sense of place that reuses and restores heritage assets you can add value to a development and reduce social exclusion. Heritage assets bring a sense of place to an area, and the associated character and distinctiveness can provide a framework for regeneration plans. Local communities are proud of their heritage and by using heritage assets in regeneration schemes, local pride and self-image can be strengthened. The bid to have the Chatham dockyards designated a UNESCO World Heritage Site should be used as a catalyst for Medway's regeneration. By filling Medway's empty homes and securing development that sympathises with Medway's rich heritage, communities can get involved to help conserve them.

37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?

Each development should be unique and sympathetic to its surroundings. They should be low carbon with solar panels on roofs to contribute to energy production. Brownfield sites should be a focus for development and regeneration; and to preserve green spaces as much as possible. Smaller developments and self-builds should be encouraged to support delivery of local plan targets and diversity of character for the areas that are being developed. New developments should have good links to nearby urban centres (preferably walking distance to limit traffic), green spaces and community facilities.

Rural Issues

38) How should the role of Hoo St Werburgh as a service centre be developed?

It is essential that an audit of existing services is completed. This can assist the Council to determine a settlement hierarchy which would indicate, according to broad sustainability criteria, whether smaller settlements can make a contribution to meeting development needs. It is understood an infrastructure audit has been carried out, but without access to this information it is difficult for CPRE to comment on the role of Hoo, both as it relates to a hierarchy of settlements and in terms of complete range of services available to its residents.

In general terms, in rural settlements, CPRE Kent supports the provision of affordable housing, or other housing to meet local needs on appropriate sites, where that is broadly supported by the local community. The case has not yet been made to demonstrate that Hoo St Werburgh, nor any other rural settlement could make a significant contribution to wider development needs.

40) How should the Local Plan address the need to maintain and improve access to services in rural areas?

Understanding the services available to our rural communities is essential. There may be value, subject to consultation with local people, in allowing appropriate small scale development in the rural areas where this meets local needs and supports long-term sustainability of settlements.

Maintaining and, where possible, improving access to services and employment can broadly be supported in terms of creating sustainable communities. In order to deliver these, previously developed land in sustainable locations should be reused as far as possible so that the benefits to community life are maximised. It is clearly important to discuss the future of villages with the Parish Council and local people.

Open Space

49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

The open space resource available to the people of Medway contributes to physical and mental health, wildlife, tourism and numerous other ecological services. It is necessary at this stage in the process to update the open spaces strategy, so that the plan-making process can properly understand quantity, quality and accessibility of spaces to the existing and future population before setting appropriate open space standards. In the absence of this it is not appropriate to consider rationalising the estate, particularly in view of an already constrained local standard. Open space is made up of numerous open spaces types, and communities may be deficient in certain types of open spaces even if the total resource appears to be in surplus.

Natural Resources

56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

Protection of Best and Most Versatile Agricultural land is an issue of national, as well as local importance. Land at the urban edge often measures well against sustainability measures associated with proximity to employment and services, but in the Medway area is often high quality agricultural land. This conflict, together with a limited availability of lower quality land means that Medway should redouble its efforts to identify as many sites as possible within the urban area, supported by a proactive enabling team. At this early stage in the plan-making process it is recommended two additional studies are completed:

- (1) A research study on BMV agricultural land to inform plan-makers and other stakeholders in the Medway Council area about the economic value of the best and most versatile (BMV) land. Swale Borough Council completed a similar piece of work, and this has been helpful information.
- (2) A new urban capacity study should be used to proactively identify urban brownfield sites. The importance of agricultural land and its relevance to sustainable development can be best protected in constrained locations like this by proactive approach to identifying urban brownfield sites. Even small sites, when properly promoted by an LA, can make a significant contribution to 5 year supply, and help avoid the over reliance on large greenfield sites.

Air Quality

57) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?

It is important to ensure that new development does not make local air quality any worse. Indeed improvements should be sought through Local Plan sustainable transport commitments. The Local Plan and a Sustainable Transport Strategy need to make sure they properly fulfil the key role they need to play in delivering a shift to non-car modes of development.

Minerals

59) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?

It is important for the Medway area, and more broadly in South East region, that wharves and supply-side infrastructure are protected. These will be especially important in contributing to the routes available for importing construction materials and long term sustainability of transport.

Sustainability and climate change

61) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?

Sustainability appraisal is an essential means by which we can ensure that the process of development plan preparation takes account of sustainability. Generation of sustainability objectives and the key questions against which the plan is tested should be subject to consultation. If the Medway Council Sustainability Appraisal Scoping Report is pre-NPPF, then a review is essential. The issues and 'plans and programmes' context has changed substantially.

Social sustainability is a significant issue for the Medway area. Although the text of the document mentions limited access to green spaces at some urban areas, it fails to recognise this as substantial issue. The health and well-being disadvantages associated with a lack of access to open space / countryside is notable. While, of course, each site needs to be considered for the contribution it might make to meeting development needs, there is a strategic issue of key importance for the Medway area associated with the access of its existing population to countryside and open spaces - and the associated ecological services. From this perspective it is essential that the commissioned Green Infrastructure Planning Project is completed before future strategies for growth can be progressed.

Green infrastructure can be multifunctional and can increase access to recreational opportunities, benefit wildlife, store water, provide opportunities for food production, and provide access to relaxing spaces. Spaces should be linked into a network and care should be taken not to increase recreation on the most sensitive wildlife habitats.

63) What measures should new development take to mitigate and adapt to the risks posed by climate change?

CPRE disagrees with the concept that *'because of the relative uncertainty about potential impacts and solutions, it may be appropriate to focus on measures which are easy and lower cost to implement, or which bring additional benefits'*. It is no longer appropriate for climate change mitigation and adaptation to be an 'add-on' in local plans. Local Plans should be a key tool by which we ensure that future communities are resilient to the impacts climate change (some of which are inevitable) and minimise the contribution of our activities to future climate change.

The local plan should encourage a range of measures, including: encouraging renewable energy production on buildings; ensuring development is in sustainable locations; ensuring accessibility of sustainable transport modes; enhancing green infrastructure networks; securing sustainable urban drainage, and ensuring building design and layout incorporates resilience to climate change.

The Council should not be distracted by the outcomes of the housing standards review. Good design and the improved resilience to climate change that this can give our new communities remains a tool that local policy preparation should use proactively.

Tackling climate change, including mitigation and adaptation should be incorporated in the sustainability appraisal framework. This can ensure the concept is integral to plan making.

65) Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?

The South East is classified as an "area of serious water stress" by the Environment Agency, and is likely to be the most susceptible to the effects of climate change. Maximum standards for water efficiency should certainly be sought. CPRE is concerned that the Water Resources Management Plan and its forecasts do not take into account the total (and updated potential housing requirements) extent of population increases in Medway and more generally in the south east.

65) How should flood risk and SuDS be taking into account in planning for growth in Medway?

Paragraph 23.3 is not an NPPF quote and in fact poorly represents a statement in the Planning Practice Guidance. SuDS do not make development appropriate in areas at risk of flooding. Inappropriate development should be directed away from areas at highest risk of flooding and the 'Technical Guidance to National Planning Practice Framework' gives further advice on implementation of the NPPF.

Making Space for water is a critical planning issue and there is clear national guidance on a sequential approach to the delivery of development. It is of course agreed that SuDS should be considered in all major development, where appropriate. The benefits can be substantial to reduce the impacts and causes of flooding. They should be incorporated into the green infrastructure elements of development design and combine water management with recreation and biodiversity network benefits where possible.

Energy

68) Should we allocate sites or zones for wind energy development?

69) What policies should we set for other forms of energy development?

While wind and solar energy production can make an important contribution to tackling climate change, CPRE believes this should not come at the expense of the beauty, character and tranquillity of the peninsula. Proposals should be assessed for their potential impact on the landscape, taking account of their cumulative impact, and strongly resisted if the impact is unacceptable or not supported by local communities. Opportunities should be sought for solar energy production on existing buildings.

Transport

71) What infrastructure is required to support Medway's growth over the plan period?

72) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

CPRE agrees with the list for consideration in paragraph 25.6 of the consultation document. The Local Plan does however, need to prioritise the following when identifying sites and infrastructure requirements:

- (1) Reduce overall need and demand for travel;
- (2) Promote a shift to sustainable modes - especially walking, cycling and public transport - with more innovative approaches and better design of systems;
- (3) Increase capacity only if the first two priorities have been fully implemented and environmental limits would not be exceeded.

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

The plan should seek to safeguard (using Article 4 Directions where appropriate) employment land closely related to wharves, and protect the wharves themselves. Wharves are a diminishing and finite resource and (even if currently underused) may be essential for sustainable transport in the future.

Deliverability

76) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?

In more general terms, CPRE is concerned that the identified housing need is unlikely to be deliverable. The suggested level of housing need has not been delivered in the last 25 years, even in the years of high density flat development prevalent at the end of the last decade. Undeliverable development requirements result

in a failure to meet 5 year supply quickly after adoption, leaving local communities at risk from speculative development proposals.

It is essential that local plan housing allocations deliver housing at the time and rate expected. An unrealistic development phasing of allocations inevitably results in local planning authorities failing to meet their 5 year supply, resulting in speculative development being given permission. CPRE Kent appreciates the issues raised at paragraph 26.7 in terms of the benefits of large sites in the delivery of significant infrastructure. However, small sites are incredibly important in the preparation of a deliverable plan. They can be delivered quickly and will make a significant contribution to meeting 5 year supply in the early years of the plan.

77) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

In the absence of a published SHENA or SHMA, CPRE has not been able to comment on the Housing Needs calculations, the extent of the housing market area, nor the appropriate level of affordable housing. CPRE would welcome the opportunity to comment on this question when these key pieces of evidence are finalised and become available.

Development Strategy

80) Are the development principles right? Should other guiding principles be introduced?

Development principles should include the following:

- **Minimising energy needs** through the appropriate design and location of development, and through building mounted renewable energy technology and sustainable construction methods.
- **Protecting and enhancing the natural, historic and built environments**, including Medway's network of green infrastructure which is essential to support the health and wellbeing of communities.
- Ensuring full local **community involvement** in planning for significant new proposals.

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

The advantages and disadvantages of different development options are a useful commentary for the range of potential development patterns. It is important, however, that these options are subject to a high level sustainability appraisal, with the advantages and disadvantages approached in a more structured manner according to sustainability objectives. This is a specific requirement of the SEA Legislation and receives considerable scrutiny.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

The growth requirements suggested in this options document have not been subject to scrutiny due to background documents not being available – including SHMA and Sustainability Appraisal.

Any future decision at Lodge Hill will have substantial implications for the combination of development types that is appropriate. Certainly urban brownfield sites will be key to providing housing in sustainable locations that can contribute to regeneration aspirations and CPRE has suggested previously in this questionnaire that detailed study of urban capacity is essential. Beyond that, detailed assessment, consultation and Sustainability Appraisal will need to determine the most appropriate strategy for meeting remaining development needs. Clearly there are difficult issues to balance. Development associated with the loss of agricultural land on the Hoo Peninsula will have implications for the sustainability of new development and might be particularly harmful to internationally important wildlife habitats. The loss of less extensive areas of agricultural land at urban edge locations would be detrimental to urban edge landscapes and the ecological services essential to the health and quality of life of urban communities. Sustainability Appraisal and consultation are key, but sequential approach will clearly be fundamental to the preparation of a sustainable Medway plan and these decisions cannot be made until urban capacity is considered in detail and the future of Lodge Hill is known.

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

Medway does provide opportunities for high density urban riverside development. Not only is high density development appropriate in Medway, the sensitive nature of the rural area (and its relationship to the Thames Marshes / North Kent Marshes SPA) and the scarceness of accessible countryside at the urban edge means that every effort should be made to maximise the contribution of previously developed urban sites to meeting development requirements.

Although retention of urban employment sites is important to sustainability of the settlement, it might be appropriate in some cases to enhance the urban environment through mixed use redevelopment to include flexible employment space. Such developments can have short term barriers to viability and difficulties with land assembly. For this reason it may not be appropriate to rely on them in the early period of the plan.

84) Should the green belt boundary be reviewed?

The Green Belt boundary should only be altered in exceptional circumstances. Much of the urban area is delimited by the M2 and is not available for urban extension. The rest is subject to a range of other national designations, including AONB. It is unlikely that a boundary review would be successful in identifying sites.

Name: Daren Terry

Reference

77

Organisation

On Behalf Of

Type of Consultee

Member of the public

maryott, kyle

From: [REDACTED]
Sent: 16 February 2016 13:49
To: policy, planning
Subject: Day Care Centres
Attachments: UniteLogo.gif

Follow Up Flag: Follow up
Flag Status: Completed

We must keep our centres open across Medway NOT Close them

To Start with that to myself is a excellent idea ! ! !

I know we can not do it with out funding's, so we should all pull together to help fund idea's

We don't want the £4.4million spent on a concert airport runway this is just a wastes of money We need to scrap this idea forthwith!!!!

Please don't ignore me here

That's all now

From

Daren Terry

Name: Matthew Fox

Reference

78

Organisation

Bilfinger GVA

On Behalf Of

Type of Consultee

Developer/Consultant



Report

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Medway Council Local Plan Issues and Options 2012-2035

Defence Infrastructure Organisation

Responses to Questions

February 2016

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Appendices

Appendix I Replacement Site Location Plan and Replacement Indicative Masterplan

Prepared By: Matthew Fox
Status: Final
Date: 29 February 2016

C:\Users\Ks07\Documents\Kate\Development\GVA Report Contents.Docx

For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 Bilfinger GVA (BGVA) is instructed by the Defence Infrastructure Organisation (DIO) to formally respond to the Medway Council Local Plan “Issues and Options” Consultation Document. Section 2 of this Report provides DIO’s detailed responses. We provide the context to these representations below.

The Lodge Hill Planning Application

- 1.2 BGVA is DIO’s appointed planning consultant on the pending planning application proposing a mixed-use and sustainable new settlement on the strategic and predominantly brownfield site at Lodge Hill located on the Hoo Peninsula (up to 5,000 dwellings) (Ref. MC/11/2516). Medway Council resolved to grant outline planning permission for this scheme on 04 September 2014 but it was necessary to refer it to the Secretary of State as it was not wholly in accordance with the adopted Local Plan and there were objections from Natural England and Sport England. The Secretary of State called the application in for his own determination on 13 February 2015. Attached at **Appendix I** is the application “Replacement Site Location Plan” and “Replacement Indicative Masterplan”.
- 1.3 The application will be determined by the Secretary of State following a public inquiry which will follow a “bespoke” programme (as the inquiry will sit for more than three days). The programme is still to be finalised by the Planning Inspectorate, but it is likely that the inquiry will commence in Spring 2017, and could sit for up to seven weeks.
- 1.4 It was originally envisaged that the inquiry would be held in late 2016 but the programme has been delayed due to the need to undertake, and consult upon, further ecological surveys (as formally requested by the Planning Inspectorate through a Regulation 22 Request requiring Further Environmental Information). These surveys are now underway, and DIO’s project team is now preparing the relevant evidence for the inquiry.
- 1.5 The Chancellor’s Autumn Statement in 2015 confirmed the Government’s intention to accelerate housing supply including a commitment to release public sector land with capacity for 160,000 homes by 2020. As part of this commitment, the Ministry of Defence has its own target to release surplus land capable of accommodating 55,000 homes. On 18 January 2016, Defence Minister Mark Lancaster announced the release of twelve MOD Sites as part of this target and Lodge Hill was included within the list of sites to be released as a first tranche.
- 1.6 The Government has agreed that Lodge Hill will be transferred from DIO to the Homes and Communities Agency (HCA) as of 01 April 2016. The HCA is an executive non-departmental

public body sponsored by the Department for Communities and Local Government (DCLG), and they will be responsible for progressing the application through the inquiry process to determination by the Secretary of State and, thereafter, disposing of the site for redevelopment. The responses set out in Section 2 are provided on behalf of DIO but the HCA has also reviewed them.

- 1.7 BGVA's responses in Section 2 are submitted in support of the strategically significant Lodge Hill development. It should be noted that DIO have made separate representations which reflect their wider land holdings in Medway Council's administrative area.

Strategic Housing and Economic Needs Assessment

- 1.8 DIO and/or HCA reserves the right to make separate representations (if necessary) on the Strategic Housing and Economic Needs Assessment (SHENA). These documents were published in late February and Medway Council has confirmed that representations on the SHENA are possible until 24 March 2016.

Contact Details

- 1.9 Should any further information be required please contact:

Stephen Hollowood
Senior Director

T: [REDACTED]

E: [REDACTED]

Matthew Fox
Associate

T: [REDACTED]

E: [REDACTED]

2. Responses to Consultation Questions

- 2.1 This section is structured to provide DIO's responses to the questions posed within the Council's Consultation Document.

Q1: What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

- 2.2 DIO welcome the reference in the Consultation Document to the Council's vision needing to respond to the projected population growth in the period to 2035 (a 20% increase), driving economic success, addressing inequalities and delivering regeneration.
- 2.3 The growth requirements which have been quantified through the recent SHENA study are considerable, particularly in relation to housing needs, and the Local Plan must acknowledge this and pledge to deliver the District's own needs during the Local Plan period mindful that this is an important driver to delivering regeneration in the wider Thames Gateway. Furthermore, Medway features significant socio-economic inequalities and it is therefore important that the Local Plan vision strives to reduce these through encouraging new investment and development.
- 2.4 In this light, the vision should reinforce the area's role in delivering regeneration in the Thames Gateway. A key component of this regeneration is delivering growth on vacant brownfield sites, such as Lodge Hill, a theme that has been supported consistently through various Thames Gateway supporting policy and strategy documents. Indeed, given the potentially significant role of Lodge Hill in meeting the Authority's housing needs (providing up to 5,000 dwellings which equates to approximately 17% of the emerging Objectively Assessed Housing Need of 29,463 dwellings), it is considered appropriate that the vision should include specific reference to this site (recognising that planning permission is yet to be granted by the Secretary of State).

Q2. What do you think are the strategic issues that the Local Plan needs to address?

- 2.5 The principal strategic issues that the Local Plan needs to address are as follows:
- i. **Accommodating the scale of housing growth:** The SHENA has identified an Objectively Assessed Housing Need (OAN) of 29,463 dwellings between 2012 and 2035 (1,281 per annum). This represents a huge uplift over past Local Plan targets and completion rates, (between 2001 and 2014 annual net completions were 695 dwellings on average) and will be a challenge to deliver in relation to identifying "deliverable" and "developable" sites (NPPF para. 47) having regard to urban capacity and environmental constraints. Furthermore, it is essential that Medway meets its own housing needs because there is unlikely to be any spare capacity throughout the wider housing market area. Para. 7.10

of the Issues and Options Consultation Document states the Council's intention to meet its own needs and this is supported by DIO.

- ii. **Addressing socio-economic inequalities and delivering regeneration:** Medway experiences socio-economic inequalities and high levels of out commuting and has an important role to play in delivering investment to meet Thames Gateway regeneration objectives. It is therefore important that new development (such as at Lodge Hill) delivers socio-economic and regeneration benefits, including new employment and community uses and infrastructure improvements in line with the strategic regeneration proposals.

Q3. How should the Council respond to these issues?

- 2.6 The delivery of a new settlement at Lodge Hill will go a considerable way to accommodating the Council's housing needs on a predominantly brownfield site located on the rural Hoo Peninsula and will deliver a truly sustainable community (including a unique office/R&D employment offer, new community and retail facilities and transport infrastructure) which will bring significant benefits to the existing communities throughout Medway and the Hoo Peninsula.

Q4. Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

- 2.7 BGVA have prepared the SHMA which is NPPF and NPPG compliant. DIO agrees with the SHMA's findings in relation to the identified OAN of 29,463 dwellings over the Plan period. However, it is important that this evidence base is kept up to date and refreshed at appropriate points during the preparation of the Local Plan. For example, following the publication of future population and household projections by ONS or DCLG.

Q5. What do you consider to be the appropriate HMA for Medway?

- 2.8 The HMA is identified within the SHENA as encompassing the Districts of Medway, Gravesham, Swale, Maidstone and Tonbridge & Malling, albeit the core relationships for Medway are certain areas of Swale, Maidstone and Tonbridge & Malling. It is important that Medway meets its own OAN within its administrative area because it needs to deliver significant socio-economic regeneration and there is limited spare capacity throughout the wider HMA to meet these housing needs.

Q6. Do you agree that 25% is an appropriate level for the requirement of affordable housing...?

- 2.9 DIO wish to highlight that the draft planning obligation associated with the Lodge Hill call-in application proposes to deliver 28% affordable housing on-site (up to 1,400 dwellings) with a further 2% off-site through a commuted sum. It is therefore evident that the Lodge Hill development will deliver a significant benefit in the form of a major affordable housing contribution as part of a sustainable new settlement and fully in line with NPPF policies.

Questions 7 and 8: Forms of Housing

- 2.10 The SHENA provides an assessment of the specific groups requiring housing in Medway over the Plan period. DIO wish to highlight that Lodge Hill will be the most viable means of meeting these needs in the form of a deliverable and sustainable new settlement which can provide a wide-range and mix of tenures that will meet the social and demographic needs of the local communities.

Q9. How can development make a positive contribution to the health and wellbeing of Medway's communities?

- 2.11 Lodge Hill is a fundamentally important development for Medway as it will provide the scale and critical mass capable of delivering a range of supporting uses and infrastructure, not only to meet its own needs, but also the needs of existing communities (particularly those on the Hoo Peninsula). The scale of development is reflected below:

- New B Class employment floor space (44,100 sq m);
- New retail floor space (5,321 sq m);
- A secondary school;
- Three primary schools;
- Community and healthcare centres;
- Two hotels;
- C.100ha of public open space (formal and informal);
- Pedestrian, cyclist and public transport infrastructure; and
- Local highway improvements.

Questions 10 to 12 – Starter Homes and Self/Custom Build Housing

- 2.12 The Government is placing an increased emphasis upon the role of Starter Homes and self-build housing in helping to meet housing needs and to enhance access to house ownership. Assuming that there is a demonstrable need for these housing types in Medway, it is

contended that Lodge Hill provides a valuable opportunity to deliver such tenures in a significant quantum and commercially viable form as it is a strategic development which provides the requisite critical mass and levels of viability to deliver appropriate supporting uses and infrastructure.

Q15. Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill ... ?

2.13 The Lodge Hill planning application proposes:

- Up to 36,750 sq m of B1 floor space (gross); and
- Up to 7,350 sq m of B2 floor space (gross).

2.14 The proposals have been formulated from a detailed policy review, a review of the wider economic context and a robust market assessment. The vision is to deliver a genuinely mixed-use development which complements the wider Medway offer, is well-connected, reduces the need to travel for residents and has strong relationships with education facilities. The type and quantum of floor space is a realistic level of provision with capacity on-site to deliver higher density floor space in the future if sufficient demand were to be identified.

2.15 The scheme will deliver a high quality and unique economic offer to Medway and the wider Thames Gateway by attracting new investors and businesses to the area (potentially the key sectors of business services, environmental industries and construction). The new business offer will complement the Medway Towns and larger industrial sites and will provide opportunities and linkages with the wider Hoo Peninsula and Grain, including accommodation for small and growing businesses.

2.16 The Employment Land Needs Assessment forming part of the SHENA identifies Lodge Hill as a unique employment offer for Medway. This reflects the site's status as a "blank canvas" which has the ability to deliver a high quality employment environment (campus style office and /or research and development function) directly adjoining a comprehensively planned residential development, and this fully accords with the scheme vision developed by DIO. As noted in the Consultation Document (Para. 8.20), although there is a considerable supply of employment land throughout Medway this is unlikely to be suitable for future employment needs, particularly in respect of SME, office-based, tech and creative industries. Lodge Hill is a valuable opportunity in this regard as it proposes to deliver land for the applicable use clauses (B1 and B2) within which these industries would flourish and offers the ability for purpose-built floorspace within an attractive new settlement environment. It can therefore make a major contribution to the need to enhance Medway's economic output and reduce levels of out commuting by attracting businesses and employees to a high quality environment on the Hoo Peninsula. The evidence suggests that it is the only available option in Medway to deliver a

truly balanced community on a strategic and predominantly brownfield site, and forms a unique opportunity to deliver socio-economic regeneration in the Thames Gateway.

- 2.17 In addition to the proposed B Use Class floor space, there will be significant employment generation in retail, hospitality, leisure and recreation and public/personal services (as well as home-based businesses). In total, around 5,500 people would work on-site, which broadly equates to one job per dwelling.

Q20. Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?

- 2.18 The Lodge Hill development has been identified in the SHENA as a unique employment offer within the identified Medway portfolio. Providing a high quality office/R&D campus as part of a strategically planned new settlement (alongside other employment generating uses such as retail and hospitality) provides an opportunity to deliver synergies between uses and users/residents. It therefore offers the best option currently available for self-containment and reducing the high levels of out-commuting from Medway (as well as enhancing economic output).

Q29. What should our approach be to proposals for new or enhanced out of town retail?

- 2.19 The Lodge Hill new settlement will provide:
- Up to 3,251 sq m (GFA) of convenience retail (A1 Use Class);
 - Up to 2,070 sq m (GFA) of comparison retail;
 - A garden centre; and
 - Two hotels.
- 2.20 The above is proposed in an out of town location, but is provided as part of a mixed-use new settlement of up to 5,000 dwellings. The quantum of retail floor space exceeds the threshold expressed in the NPPG (2,500 sq m) for out of centre uses, so DIO has submitted a Retail Impact Assessment. This has demonstrated that there would be no significant adverse impact on any existing defined centre and that the facilities are of an appropriate scale and type to meet the needs of future residents. As such, the national policy tests for town centre impact and sequential approach are satisfied.
- 2.21 Having regard to the above, the Local Plan should recognise that a new settlement at Lodge Hill will require appropriate retail/leisure uses to support a sustainable settlement.

Questions 30-32: Environment

- 2.22 It is recognised that large parts of Medway are constrained by environmental designations (SPA/SSSI) and policies (Green Belt and Kent Downs AONB) and the presumption will be to safeguard these designations/areas unless there are valid reasons to justify development. The degree of protection afforded to these designations must be commensurate with their acknowledged importance, and a balance must be struck between social, economic and environmental impacts and benefits when development proposals are advanced, in accordance with national planning policy.
- 2.23 Having regard to the challenging housing and employment growth requirements emerging from the SHENA and the need for Medway to deliver regeneration and address inequalities, it is inevitable that some sensitive land will have to be developed, such as Lodge Hill which is a predominantly brownfield site designated as a SSSI. National planning policy requires that significant harm to biodiversity should be avoided, mitigated or, as a last resort, compensated for, and that where an adverse effect on a SSSI is likely, an exception should only be made where the benefits clearly outweigh the impacts (paragraph 118, NPPF). The Lodge Hill proposals will mitigate and compensate for harm to the Chattenden Woods SSSI and, furthermore, will deliver significant social, economic and environmental benefits which, in our view, will clearly outweigh the identified harm when assessed in the planning balance. Indeed, this was the decision of Medway Council in resolving to grant planning permission.
- 2.24 Policies within the Local Plan can provide specific requirements for environmental enhancement measures as part of development proposals. For instance, specific amounts of green infrastructure can be requested having regard to national policy and best practice.

Questions 38-42: Rural Issues

- 2.25 The Lodge Hill proposals provide an opportunity to deliver a large portion of the growth needs within a comprehensively planned new settlement on a predominantly brownfield site. However, this development will also deliver significant benefits to the rural Hoo Peninsula, including new employment, retail, schools, healthcare, public open space and public transport.

Questions 43-44: Infrastructure and Services

- 2.26 The Lodge Hill new settlement will deliver a wide-range of infrastructure and services as summarised in response to Question 9. This is the advantage of a strategic new settlement as such services can be delivered comprehensively and in a commercially viable way. In particular, it is highlighted that the development will deliver c.100ha of public open space

which will provide valuable opportunities for recreation and, in turn, encourage the establishment of a healthy community.

Questions 47 and 48: Social and Community Infrastructure

- 2.27 The development of a comprehensive and sustainable new settlement at Lodge Hill offers the most viable means of delivering new social and community infrastructure to address the growth requirements and in an appropriately phased manner. The development would include a secondary school and three primary schools, a community facility and open space. In addition, the development will provide a new healthcare facility (1,500 sq m).

Questions 49-53: Open Space

- 2.28 DIO wishes to highlight that the Lodge Hill development provides the opportunity to deliver a significant quantum of open space as part of a sustainable new settlement. Approximately 100ha of open space (including water bodies) will be provided which is almost three times the existing local authority standard (3.25ha per 1,000 population).

Q54. What provisions should be made for sport in the Local Plan, including in relation to population growth and new developments?

- 2.29 Standards for sports provision should be devised from detailed evidence on existing levels of provision and future needs (based upon projected levels of growth). The Lodge Hill new settlement proposal provides the opportunity to deliver playing fields and pitches based on local requirements as part of creating a mixed and sustainable community.

Questions 76-79: Deliverability

- 2.30 The Lodge Hill proposal will deliver a significant portion of Medway's growth on a phased basis (i.e. throughout the proposed Plan period). It is a "deliverable"/ "developable" (NPPF para. 47) scheme for which Medway Council has resolved to grant planning permission. It will deliver appropriate supporting infrastructure in a commercially viable form and within a timely manner.
- 2.31 It is understood that the SHENA includes an Affordable Housing and CIL Viability Testing assessment. This should test the viability of Local Plan policies such as affordable housing targets and a CIL Charging Schedule to ensure that development remains viable and deliverable. In particular, it should ensure that the Lodge Hill scenario is included i.e. strategic development on predominantly brownfield land within the rural area.

Q82. Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

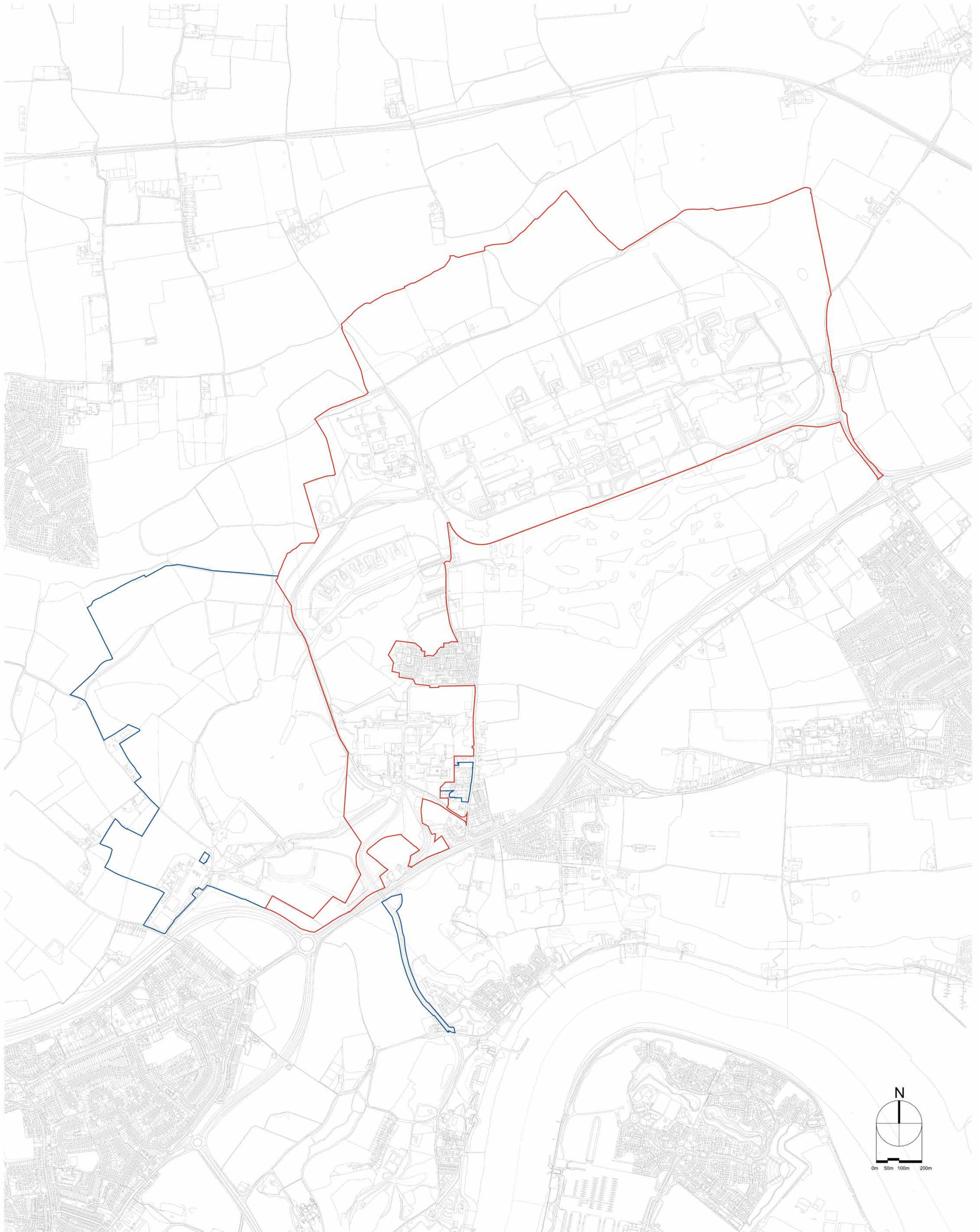
- 2.32 The view is taken that the Lodge Hill new settlement offers the most sustainable means of meeting the challenging growth requirements for Medway. Indeed, the Council has already resolved to grant planning permission for it after considering the application in 2014.
- 2.33 The Lodge Hill planning application was supported by a “Development Needs and Alternatives Report” (Quod, February 2014) which provides a highly detailed assessment of potential alternative development sites throughout Medway in comparison to Lodge Hill. This demonstrated that there is no better alternative to Lodge Hill in delivering transformational change in the Thames Gateway and satisfied the “avoid” test in NPPF para 118. It demonstrates that Lodge Hill is the only site capable of meeting development needs in a coherent and deliverable way, with the alternatives all suffering from ecological constraints.
- 2.34 The housing growth requirement which has emerged from the SHENA (29,463 dwellings) is extremely challenging and other types of strategic greenfield land release will inevitably be required in Medway, even if Lodge Hill is granted permission due to the absence of previously developed sites of any comparable scale. As such, it will be necessary for the Council to appraise the sustainability of all options in preparing the Local Plan, but the evidence provided to date as part of the planning application and Local Plan reinforces the clear conclusion that Lodge Hill is the most sustainable option.

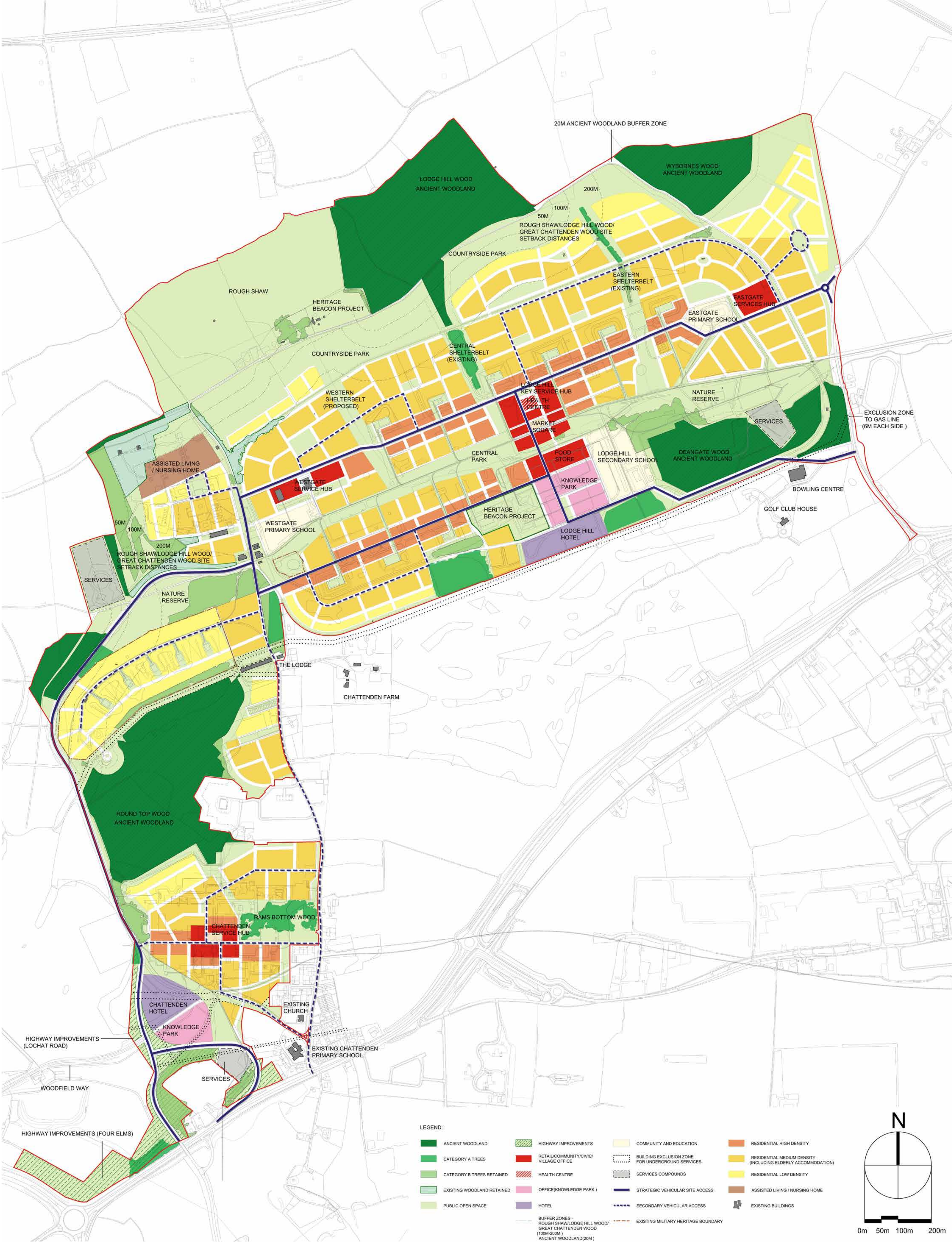
Bilfinger GVA

February 2016



Appendix I
Replacement
Site Location
Plan and
Replacement
Indicative
Masterplan





Name: Cllr Rupert Turpin

Reference

79

Organisation

On Behalf Of

Type of Consultee

Councillor/MP/Parish Council

From: [REDACTED]
Sent: 25 January 2016 10:30
To: policy, planning
Subject: green spaces

Follow Up Flag: Follow up
Flag Status: Completed

As a local councillor and resident I would like to see strong consideration given to green spaces within the urban area rather than just the green belt around it. I believe that for residents these green spaces in their localities are an important way of reconnecting with nature, places for walking dogs and children's playgrounds. I would strongly oppose safeguarding green belt more than our green lungs which are relatively small green spaces for the community within the urban area. London is justly famous for its many green parks.

Pressure for house building should not be used as a reason for "infilling" within urban areas which would leave Medway with a monotonous expanse of concrete or paved areas.

Cllr Rupert Turpin

Name: Su Ormes

Reference

80

Organisation

Public health Medway Council

On Behalf Of

Type of Consultee

Government/Public Body

For your reference:

<http://www.medway.gov.uk/PDF/Final%20Issues%20and%20Options%20Public%20Consultation%20Copy.pdf>

Vision for Medway 2035

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

- Ensuring good quality stock is built that is affordable and suitable for all ages, including adaptability for independent living. Each development should have enough space for food growth, physical health and mental wellbeing.
- Realising opportunities to drive economic success and addressing inequalities across Medway.
- Regeneration and investment are essential but without detriment to Medway's heritage or its natural environment and green spaces.
- Every citizen should have easy access to open space and green space
- Implement design standards that preserve Heritage assets with a View Management Policy but with scope to deliver a successful place where people want to live.
- Enabling Medway to be a Dementia Friendly community will empower people to have high aspirations, confidence and to know how to contribute.

Strategic Issues

2) What do you think are the strategic issues that the Local Plan needs to address?

- Housing
- Economic Development
- Safeguarding the natural open space including areas of outstanding beauty and prime agricultural land.
- Greening the towns.
- The changing environment can positively enhance health and well being of residents and workers

3) How should the council respond to these issues?

- Encourage local economic development by building attractive housing options that makes Medway desirable to work and live in.

- Ensure we actively seek to be take advantage of the economic development in the neighbouring boroughs.
- Safeguarding the natural open space including areas of outstanding beauty, prime agricultural land
- Continue the work with the KNP's and the Kent Environmental Planning Group and enable realisation of the Thames Estuary 2100 Plan.
- A core principle should be that ever citizen should have easy access to open and green space.
- Health and wellbeing to be given equal priority to regeneration and economic growth

Housing

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

Yes

5) What do you consider to be the appropriate housing market area for Medway?

The Government's plans to increase the supply of 20% should be incorporated in the ratio of housing stock at each development site, as should the affordable house allocation. Ensuring all housing is adaptable for physical needs to suit lifetime living.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

yes

7) What form of housing best meets the needs of Medway's growing population of older people?

Extra Care housing is the optimum choice, however all new housing should be adaptable to physical needs and suitable for lifetime living Looking at the forecast of doubling Dementia rates, thought should be given to accommodating this group in particular. Perhaps a Dementia village would be a great opportunity to develop a showcase demonstrating ways that we can support people with dementia and their carers to live well.

8) What housing is needed for other specific groups in Medway?

Public Health support the proposals desire to meet the needs for:

- Self builds, custom builds, student accommodation and gypsy and travellers needs.
- Enabling Medway to be a Dementia Friendly community

- Providing family outdoor and sports spaces

9) How can development make a positive contribution to the health and wellbeing of Medway's communities?

- Increase the number of green spaces and improve accessibility to both new and existing as this contributes to improving mental wellbeing and physical activity.
- Improve the living standard of existing housing stock not just new builds.
- Build environment which priorities sustainable travel not the car to reduce car use, and improve physical activity both cycling and pedestrian
- Reinstate the Park and Ride
- Rivers walk promenade accessible enough for walking, cycling and accessible to all.
 - <http://www.medway.gov.uk/leisurecultureandsport/walking/thesaxonshowerway.aspx>)
 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444388/ECP-south-east-map.pdf
 - <https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy>
- Developers to design in 'healthy spaces' e.g. food growing/allotments.
- Tenants agreement to include food growing
- All new developments to have green spaces and/or green gyms/ trim trails or other similar assets
- Design developments to maintain the parking standard but allow for safer street play.
- New development design should to the Active by Design standard.
http://www.designcouncil.org.uk/sites/default/files/asset/document/Active_By_Design_Brochure_web_LATEST.pdf
- All new houses to be build to the new national standards
<https://www.architecture.com/RIBA/Campaigns%20and%20issues/Homewise/Homewise.aspx> and
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/421515/150324_-_Nationally_Described_Space_Standard_Final_Web_version.pdf
- New developments designs to ensure there is good sustainably travel access to all amenities with good street lighting.
- Reduce public transport fares though developer investment

- Improved transport links to park and ride, access to parks and country parks, green spaces
- Design safe active travel space when planning new developments
- Positive messaging on green spaces only – no 'no ball games signs' Instead, actively encourage these activities, provide nets etc
- Active signposts directing to outdoor/walking/leisure space
- More trees to mitigate against air pollution and reduce cases of asthma. Air quality aided by green spaces Austin Brady at The Woodland Trust cites research from Columbia University showing asthma rates among young children are lower in areas with more trees and urges those involved with air quality discussions to not only focus on nitrogen dioxide but also on the importance of trees and green spaces.
- Encourage community orchards (pay as you go) following the example of community orchard in Gillingham along the side of Hillyfields Park (Parr Avenue)
- When planning for trees in developments consider planting fruit or nut trees
- Utilising the river – access and develop greater access to the river and ensure waterfront developers include mooring and encourage river activity such as investing in local rowing clubs and other river leisure activity.
- River bus/ferry
- All school new builds or extension applications should have a planning condition to ensure the school discourage car use by staff and parents and implement a active travel ethos.
- All new school builds should ensure health and active travel is a high priority from conception, consultation and design through to implementation.
- Work place – standing desks, reduces business rates for healthy workplaces who have achieved the Workplace Wellbeing Charter (a national standard used by PHE), access to public transport for new workplaces, own gyms/exercise sessions
- The development of new models of medical care will result in more services being provided in the home or community settings rather than on acute hospital sites. This provides opportunities for integrated health, public health and social care provision within localities and better access to preventative services.
- Cluster of GP's or House of GP's following the Whitstable example: <http://www.whitstablemedicalpractice.co.uk/local-services-2/estuary-view-minor-injury-unit/>
- Work with Public Health to ensure the CIL fund facilities that deliver health improvement services in the community.
- Ensure we consider surrounding Planning Authorities applications for developments near our boundaries that will impact on our health services.
- Reconsider the design and use of high streets premises to reflect changes in shopping habits.

- Regenerate unsought after properties that leads to over population of social housing which in turn leads to high anti-social behaviour – Melville Court on Brompton was cited as an example
- Undertake a feasibility study on the viability of a Garden City on the peninsula
- The peninsula should be assessed for some development but ensure these developments include green spaces, sustainable travel options, food growing opportunities on rooftops, balconies, raised beds, allotments or a community garden and easy access to outdoor space.
- When new schools are built - build in partnership so increased sports facilities have an agreement for public use with shared responsibility – community assets.
- Restrict the density of certain food class use such as A5 across Medway through the introduction of a Food Policy in the new Local Plan. Other initiatives in the Policy could be:
 - Encourage large food retailers to invest in local community healthy eating promotion initiatives such as farm to fork. And to have a free hire room available to support community projects
 - Impose a local business rate on sugary food and or high fatty foods
 - Green roofs like <http://ecogreenroofs.co.uk/green-roofs/benefits-types/>
 - Develop a planning policy to ensure developers provide allotments and community growing spaces within or close to the new development.
 - New developments need access to local healthy food shops
 - The Planning Food policy should enforce a % of healthier food in local shops to encourage a variety of foods sold as well as adequate access.
 - pay as you go Compost scheme to be part of planning policy plan to ensure developers provide these spaces within or close to the new development and/or existing spaces
 - New community centres and schools to have food growing and cooking facilities. Minimum should be for pupils, ideally accessibly to public as a community asset – community kitchens
 - Provide space for community growing {Incredible Edible <http://www.incredible-edible-todmorden.co.uk/>}

Free of Charge Sports facilities wanted:

- Maintained athletic facilities - outdoor track, long jump etc.
- Sustained promotion of existing sites and raise awareness to clubs
- Cycle park Cycling facilities – triathlon training
- 'Grass roots' standards should be mandatory for all sports facilities with 3g or 4g surfaces and at low cost
- Competitive swimming pool – 50m
- Converting army facilities to enable public use

- Enabling Medway to be a Dementia Friendly community will empower people to have high aspirations, confidence and to know how to contribute
- Develop a policy within the new local plan to address the over representation of off licenses in retail areas

10) Do you have suggestions for potential sites for starter home developments?

Starter homes are best developed in existing towns where the health assets, facilities and infrastructure are well established.

11) How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?

If the starter home development is in a rural area then developers must incorporate/finance the sustainable travel (cycle paths and footpaths) infrastructure to ensure access to amenities.

Allow homes to have good sized kitchens to allow for storage and food preparation.

12) How should the council provide for the demand for land for self and custom build housing? For example, integrated with larger developments, on standalone sites, or linked to place making ambitions to deliver highly sustainable and innovative design quality.

Standalone sites, and linked to place making ambitions to deliver highly sustainable and innovative design quality

13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?

The SHMA implies an increase is required between 5% and 13% by 2033. Public Health therefore suggests 10% is planned for in the vicinity, or within easy reach, of the Universities. Like other university towns Student accommodation should easily accessible to the university by bus cycle or walking. Boris bikes available around the student accommodation to encourage activity. Paths should be open and well lit and present a village like atmosphere.

14) What is the level and type of need for gypsy, traveller and travelling showpeople's accommodation in Medway, and what criteria should be used to identify appropriate sites?

The Government are looking to change the definition of gypsies and travellers, especially implementing requirements to prove there are nomadic. Until this policy is published it would be hard to define what is required.

A full review of gypsies and travellers accommodation should be undertaken once the Government policy has been published.

Economy

15) Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?

Public Health would ask Planners to consult with Economic Development on this question

16) What are the opportunities for further business growth in and close to town centres in Medway?

Public Health would ask Planners to consult with Economic Development on this question

17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?

Public Health would ask Planners to consult with Economic Development on this question

18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?

Public Health would ask Planners to consult with Economic Development on this question

19) How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?

Making the employment offers in Medway appealing by linking local business to Universities and HE establishments.

20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?

Businesses should incentivise local people to work locally by prioritising the recruitment of local people, possibly a slightly higher wage or a free annual bus pass.

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

All specific locational requirements should be considered against criteria (to be decided) to enable Economic Development but not to the detriment of the areas of outstanding beauty or negatively impact on preserved wildlife in green or blue infrastructure. .

Tourism

22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?

We need more modern, good standard hotels, to attract the higher end market.

Development of B&B's and hotels should have a condition they promote the place as well as themselves.

23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?

Higher profile on all activity in Medway – from country parks, events and river trips,

24) What role does the river and Medway's countryside have to play in developing tourism locally?

. More river activity is needed. But combined with existing good country parks and cycle routes – its promotion we lack mostly.

Developer condition; pay for continual promotion for 4 years.

Retail, commercial leisure and town centres

25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

Not necessarily. However small changes like moving the Farmer's Market to Chatham High Street and more diverse use of Chatham would see improvements.

The Chatham cultural night time economy should be a focus to build on

26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

Plan for investment to meet currently identified capacity and improve Chatham's leisure night time economy. Not by encouraging pubs and clubs but building on the local theatre goers - prove evening coffee shops, and cafes.

27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?

A good mix – vacant, small commercial properties should be made into residential. Flexibility is vital.

Restrict the density of certain food class use such as A5 across Medway through the introduction of a Food Policy in the new Local Plan.

Ensuring Medway is a dementia friendly community

28) Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go?

A Central location close to transport links

29) What should our approach be to proposals for new or enhanced out of town retail?

Positive and encouraging ensuring it has good active travel links, bike storage etc.

Environment

30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

Conserve the AONB, SPA's and Marine conservation zones as much as possible however some development must be accepted.

31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

Implement linking of the river walks to provide connectivity between town and countryside.

Improve the access to the River

Close the gaps on the PROW

Implement a riverside cycle route

These may have a detrimental affect to the wildlife in the SPA's so as much care as possible should be taken but compromise is key.

Develop cycle routes that linking green spaces and improve the signposting for existing routes

Enabling Medway to be a Dementia Friendly community will empower people to have high aspirations, confidence and to know how to contribute.

32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

Significant, effective green infrastructure is essential in all new developments and should be of the highest priority alongside good housing standards.

The Landscape Institute has a new position statement publication – 'Public health and the Landscape' *Creating Healthy places* sets out their 5 principles that should be intrinsic to the New Local Plan .

There are 5 principles:

1. Healthy places improves air, water and soil quality, incorporating measures that help us adapt to and, where possible mitigate, climate change. Urban heat islands: The urban heat island and its effect on heat waves and human health in Shanghai <http://www.ncbi.nlm.nih.gov/pubmed/19727842>
2. Healthy places help overcome health inequalities and can promote healthy lifestyles. Housing and Public Health; a review of reviews of interventions for improving health NICE 2005
https://www.nice.org.uk/proxy/?sourceUrl=http%3A%2F%2Fwww.nice.org.uk%2Fnicemedia%2Fpdf%2Fhousing_summary.pdf
3. Healthy places make people feel comfortable and at ease, increasing social interaction - its critical to have close by green spaces:
<http://www.sciencedirect.com/science/article/pii/S1618866704700199>
4. Healthy places optimise opportunities for working, learning and development. American study on employees reaction to nearby spaces
<http://www.sciencedirect.com/science/article/pii/S0169204607000333>
5. Healthy places are restorative, uplifting and healing both for physical activity and mental health condition.

<http://nhsforest.org/sites/default/files/NHS%20Forest%20Dissertation.pdf>

Built environment

33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

Implement design standards that preserve Heritage assets with a View Management Policy but with scope to deliver a successful place where people want to live.

Enabling Medway to be a Dementia Friendly community will empower people to have high aspirations, confidence and to know how to contribute.

34) What characteristics do you think makes a good place to live?

Open spaces, Character, Heritage assets, tourist attractions, mix of architecture. Good amenities and the prioritising of walking and cycling routes. Colour and vibrancy of open spaces. Good use of special landscape eg. The River

Adherence to the HUDU checklist is vital:

<http://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2015/07/HUDU-Rapid-Health-Impact-Assessment-Tool-June-2015.doc>

35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development?

Good open spaces, parks and other green space, heritage assets Rochester High Street, easy transport links, and the river. The residential development within the Historic Dockyard demonstrates what can be achieved - development that enhances rather than detracts. Planning Policy should protect the Heritage, green and open spaces, enhance whenever possible and allow development that will not over shadow or detract from the character of Medway.

36) What areas of Medway have weaker character and what are the opportunities for improvements?

Gillingham and Chatham High Street are very weak.

The housing stock in Weedswood, Luton and Wayfield, are extremely weak visually.

There are limited higher end pubs or other leisure amenities, especially within reach of the new Gillingham Pier development and high streets (barring Rochester)

37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas

Critical requirement: The Landscape Institute's 'Public health and the Landscape' Creating Healthy places sets out their 5 principles which should be Planning Policy.

There are 5 principles:

1. Healthy places improves air, water and soil quality, incorporating measures that help us adapt to and, where possible mitigate, climate change. Urban heat islands: The urban heat island and its effect on heat waves and human health in Shanghai
<http://www.ncbi.nlm.nih.gov/pubmed/19727842>
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3. Healthy places make people feel comfortable and at ease, increasing social interaction - its critical to have close by green spaces:
<http://www.sciencedirect.com/science/article/pii/S1618866704700199>
4. Healthy places optimise opportunities for working, learning and development. American study on employees reaction to nearby spaces
<http://www.sciencedirect.com/science/article/pii/S0169204607000333>
5. Healthy places are restorative, uplifting and healing both for physical activity and mental health condition.

Rural Issues

38) How should the role of Hoo St Werburgh as a service centre be developed?

There must be an acceptance that some of the rural areas of Medway must be used for development although local residents will resist. However, good planning policy will ensure the development is as jarring to the residents and environment as possible.

Hoo would benefit from evolving into a Market Town and possibly merging with Chattenden.

The Peninsula may be a good place to start making Medway a dementia friendly place.

Protection of the Heron trail should be prioritised

39) What provision needs to be made for employment in rural Medway?

Development should be residential and commercial, better broadband and secure reliable public transport links through developer agreements

40) How should the Local Plan address the need to maintain and improve access to services in rural areas?

Through developer agreements and government grants.

Ensure Social Isolation is considered. The Social Isolation Strategy evidences the rural areas have hot spots of socially isolated residents

http://www.abettermedway.co.uk/pdf/Ageing_well_in_Medway.pdf

41) What consideration should be given to strategic infrastructure and development in rural Medway?

The feasibility of a branch railway line should be explored including undertaking an EIA.

Strong consideration should be given to improving and enhancing the road, cycling and footpath infrastructure.

There must be an acceptance that some of the rural areas of Medway must be used for development although local residents will resist. However, good planning policy will ensure the development is as jarring to the residents and environment as possible.

42) How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?

Consultation and negotiation. Ensure the Local Plan's principles are reflected in the NH plan. As the parish council will be able to receive 25% of the revenues from the Community Infrastructure Levy, this may prove to be an enticement to cooperate.

Consider the case study 4 approach in Gloucester's Active Planning toolkit

<http://www.gloucestershireccg.nhs.uk/wp-content/uploads/2012/12/Active-Planning-Toolkit-2.pdf>

Health

43) What changes to the built environment could facilitate healthier communities?

Please refer back to points made under question 9.

- Improve access to and facilities at parks and open spaces More cycle paths and cycle storage
- Boris bikes/trams
- Park and ride
- Greening the existing infrastructure and encouraging roof gardens, balconies to grow on, green living walls, trees.
- Encourage community growing {Incredible Edible <http://www.incredible-edible-todmorden.co.uk/>}

Restrict the density of certain food class use such as A5 across Medway through the introduction of a Food Policy in the new Local Plan. Other initiatives in the Policy could be:

- Encourage large food retailers to invest in healthy eating promotion initiatives such as farm to fork.
- Impose a local business rate on sugary foods
- Green roofs like <http://ecogreenroofs.co.uk/green-roofs/benefits-types/>
- Develop a planning policy to ensure developers provide allotments and community growing spaces within or close to the new development.
- New developments need access to local healthy food shops
- pay as you go Compost scheme to be part of planning policy plan to ensure developers provide these spaces within or close to the new development and/or existing spaces
- New community centres and schools to have food growing and cooking facilities. Minimum should be for pupils, ideally accessibly to public as a community asset – community kitchens
- Enable Medway to be a Dementia Friendly community
- Develop a policy within the new local plan to address the over representation of off licenses in retail areas

Implement the *Healthy urban planning – a WHO guide to planning for people* in which it promotes an agreed, negotiated list of key health objectives for planning and by emphasizing consistent approaches at a range of scales – from sub regional planning down to specific building projects. The objectives, expressed as questions are set out below.

Do planning policies and proposals encourage and promote:

- 1. healthy exercise?
- 2. social cohesion?
- 3. housing quality?
- 4. access to employment opportunities?
- 5. accessibility to social and market facilities?
- 6. local low-impact food production and distribution?
- 7. community and road safety?
- 8. equity and the reduction of poverty?

- 9. good air quality and protection from excessive noise?
- 10. good water and sanitation quality?
- 11. conservation and decontamination of land?
- 12. climate stability?

At each scale of operation and decision-making, these criteria must be interpreted appropriately and mechanisms implemented to ensure that health is given due weight.

Consider the case study 4 approach in Gloucester's Active Planning toolkit
<http://www.gloucestershireccg.nhs.uk/wp-content/uploads/2012/12/Active-Planning-Toolkit-2.pdf>

44) How can the Local Plan encourage access to healthy food options and growing opportunities?

Follow examples and guidance:

http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/PAN6-Food_Growing_and_development-latest-Sept2011.pdf

Look to the Garden City method of development.

Look to replicate the Plymouth Plan where Plymouth is looking to be a 'sustainable food city'.

http://www.plymouth.gov.uk/plymouth_plan_part_one.pdf
 policy 8

Create communities which support breastfeeding (UNICEF Baby Friendly)

45) How can the Local Plan most effectively promote greater physical activity in Medway?

- Prioritise pedestrians and cyclists
- Dedicated cycle path for leisure use – build on the good example of the Heron Trail.
- Look to replicate the Plymouth Plan where Plymouth is looking to be a 'healthy city'.
- http://www.plymouth.gov.uk/plymouth_plan_part_one.pdf

46) What changes to the current siting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and/or to integrate health services in local communities?

Better accessibility to all GP's dentists and other health assets should be provided for within the local plan.

Explore options to integrate health services in local communities.

Serious consideration should be given for the need for a second satellite hospital - a full needs assessment and viability study need to be undertaken.

Social & Community Infrastructure

47) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?

Create new schools within new developments and/or expand existing schools.
Discuss with Children and Adults what designated sites might be suitable for large schools and secure for this purpose.

48) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?

Provision in the Plan should be made for community facilities near to the community to service both our aging population and our increasing ethnic minorities.

Being Dementia friendly at the forefront of thinking, design and implementation.

Easy to navigate physical environments will good access to health assets
Regular accessible transport links to services.
Community areas/centres in each development which are attractive, free to use, and maintained by the community

High quality childcare facilities that meet food and play standards for staff, resources and facilities.

Open Space

49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

Rationalisation is realistic if the programme is firmly linked to a green urban policy. A core principle should be that every citizen should have easy access to open space and green space.

50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

Yes. Minimum 7.39ha per 1000 population. (In line with Swale)

Quantitative playground measures

Quality measure for playground equipment (asking GS)

51) Should we move to a multi-functional hub model of provision, and what might this look like in practice?

There is a concern a hub model would mean that many citizens would not be in easy assessable reach of any green space which is vital for physical health and mental wellbeing. Health Inequalities for urban dwellings are high therefore the lack of easily accessibly, local provision is expected to widen the health gap.

52) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

A balance of the two

53) What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?

Yes seek involvement through volunteering and dedicated community groups

Sports Facilities

54) What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?

- Invest in current facilities improvement to raise the standard to **well above** average.
- Multifunctioning sports pitches
- Invest in all weather pitches
- Encourage all new businesses to offer residents an offer that includes sport, exercise and dance opportunities
- Encourage access into schools sports facilities during out of school hours.
- Agree with developers that some sporting opportunity should be a part of each development eg. Skate park, netball pitch, tennis/badminton court, outside Gym, swimming pool, running track, cycle park etc. not just a playground – this in addition to the open space and community area

Adequate support / facilities to create a sports for all / family approach to taking part in sport

55) How should the Local Plan address the aspirations for a new stadium for Gillingham FC?

Gillingham FC should have provisions made to either improve its present site or move within Medway. This would potentially draw in more tourism and use (multifunctioning conference centre).

Natural Resources

56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

Retaining the best and most versatile agricultural land is vital.

Local sustainable food is an initial opportunity to increase healthy food stock for local residents and visitors to purchase. This is line with the health and environmental agenda (food mile)

Air Quality

57) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?

Mitigation – through housing standards, tree planting, and living (green) walls. Adopt the attached guidance as a SPD



Proposed Air Quality
Supplementary Planni

Minerals

58) What approach should be taken to planning for land won minerals in Medway?

Ensure Medway continues to make an appropriate contribution to the needs of the region through supply.

59) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?

To continue their present level of contribution

Waste

560) What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?

Household - Wheelie bins for all waste materials to increase recycling rates, reduce littering, and animal foraging

Look at waste disposal facility in Medway such as waste to energy
Relocate the Waste Transfer Stations possibly to Cuxton near the recycling plant?
Clearer information on what happens to our waste and why we should recycle / reuse

Sustainability and Climate Change

61) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?

Social sustainability - implement policies to ensure dramatic reduction in all health inequalities.

62) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?

Implement policies to ensure dramatic reduction in all health inequalities. These should include compulsory HIA's for new medium and major developments at pre app stage.

A sustainable checklist should be at the initial stage of the application process for developers

Environmental sustainability should be given the same priority as economic development and regeneration. The greatest threat to public health is climate change <http://www.psr.org/environment-and-health/climate-change/>

63) What measures should new development take to mitigate and adapt to the risks posed by climate change?

- Climate change - mitigation as stated in the I&O proposal
- Space for food production, urban trees, living green walls and greening the urban areas.
- Ensure in design that orientation of buildings are considered to take advantage of natural cooling.
- Ensure a water reserve is built in Medway.

64) How can existing development and communities mitigate and adapt to the risks posed by climate change?

Space for food production, urban trees, living green walls and greening the urban areas

**65) Should Medway adopt the optional national standards for water efficiency?
What local evidence would we need to underpin this?**

Yes. Ensure a water reserve is built or other more efficient methods to achieve the standard.

Flood Risk

66) How should flood risk and SuDs be taken into account in planning for growth in Medway?

As a priority to safeguard for the future

67) What safeguards should be put in place to ensure future requirements for improved flood defences are not compromised?

Implement required policy to address the flood risk now, even though the risk is likely beyond the life of this plan..

Energy

68) Should we allocate sites or zones for wind energy development?

A new Renewable Energy Capacity Study is required so we have a clear picture of Medway's potential in this area and make policies from the findings..

69) What policies should we set for other forms of energy development?

Criteria based policies

70) How should we take advantage of opportunities for use of waste heat from the large-scale energy generation on the Peninsula?

Take full advantage of this renewable and implement policy to ensure this happens.

Transport

71) What infrastructure is required to support Medway's growth over the plan period?

Effective, well maintained footpaths and cycling routes.

Create Policy that can influence the condition of the transport network by making sure that the effect of future planned development on existing infrastructure is minimised, whilst positively planning for new infrastructure where this will be required.

72) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

Public transport - More affordable; Arriva is quite costly.

Planning Policy should ensure that Medway has:

- The capacity of the existing network to accommodate additional growth, and where investments may be needed in new infrastructure;
- An effective, accessible and affordable public transport system;
- Provision for walking and cycling to support options for non vehicular journeys, and make it easier for people to reach local services and facilities and move around Medway;
- Sustainable travel being central to the design of new developments, both in terms of larger-scale strategic sites and those sites which will be integrated into the existing urban fabric

Businesses should incentivise local people to work locally by prioritising the recruitment of local people, possibly a slightly higher wage or a free annual bus pass.

73) What provision should be made for car parking?

Parking should not be of a higher priority than cycling and walking facilities. All new developments to ensure cycling storage is not compromised by parking allocation. Follow the guidance set out by Campaign for Better Transport
<http://www.bettertransport.org.uk/sites/default/files/research-files/Sustainable-Transport-and-the-NPPF.pdf>

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

Fulfil the potential of the waterfront infrastructure through new development

75) How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?

Rochester Airport's use should be considered during the new Enterprise Zone development.

Stoke Airfield is used mainly in the warmer seasons. It should be considered possibly as a dual purpose (leisure facility)

Deliverability

76) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?

This is best answered by the experts - Planners

77) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

Yes

78) How can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?

Ensuring accessibility is key – roads, footpaths and cycling paths
Large scale sites would yield a high unit count and provide within the development health and education provisions, however the infrastructure may need to be funded by Medway or the Government.
Garden City methodology would be the preferred design choice.

79) What use should be made of new methods of delivery to help speed up the planning process, and how can we ensure that quality is not compromised in favour of speed?

LDO's, Enterprise Zones, Permission in principle.

Development Strategy

80) Are the development principles right? Should other guiding principles be introduced?

Yes the development principles are right, however with the addition of ensuring accessibility to open and green spaces is as high a priority as walking, cycling and car use.

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

Yes we agree with the assessment of advantages and disadvantages and in the mixed pattern of development.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

Public Health would support:

- a strategic review of the aging housing stock with an aim to raise quality standards

- consideration of redeveloping Medway City Estate
- a riverside development but with a **restricted height** to the high density units.
- Limiting incremental suburban development to only well planned developments with enabling countryside features and tree preservation that enhances the area.
- High priority – Hoo becoming a market town
- Plan for the long term future of Medway with consideration given to Urban extensions

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

Yes be radical:

We support the ethos of regeneration Chatham into a vibrant urban neighbourhood with a large district centre.

:

Public Health would support:

- a strategic review of the aging housing stock with an aim to raise quality standards
- consideration of redeveloping Medway City Estate
- a riverside development but with a **restricted height** to the high density units.
- Limiting incremental suburban development to only well planned developments with enabling countryside features and tree preservation that enhances the area.
- High priority – Hoo becoming a market town
- Plan for the long term future of Medway with consideration given to Urban extensions

84) Should the green belt boundary be reviewed?

Realistically and with regret if we want to fulfil our housing needs and make Medway a vibrant place to be yes there is a need to review the green belt boundary, specifically the Peninsula.

It is vital to preserve the small urban pockets of open space - Capstone and Horsted Valley and Darland Banks to ensure local residents have access to open and green spaces.

Reference should be made to the Medway Landscape Character Assessment 2011.

85) What provision should be made for mixed use in residential developments, both high density and lower density?

Yes both

86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?

We support the ethos of regeneration Chatham into a vibrant urban neighbourhood with a large district centre.

Development opportunities should be maximised at the Waterfront but with a restricted height to the high density units.

87) Do you agree that the other town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront regeneration sites?

Consideration to a holistic approach will ensure Medway fulfils its potential to be a vibrant Place

Name: Su Ormes

Reference

81

Organisation

PHE Work shop

On Behalf Of

Type of Consultee

Government/Public Body

Medway Local Plan Consultation, PHE South East response, February 2016

Issues

- We would want to see the plan demonstrably link evidence of need in the JSNA and Health & Wellbeing Strategy to plans for development and adaptations to the built environment, services and facilities.

Housing

- It would be helpful to see evidence of data linking seasonal excess deaths in older people and respiratory conditions in infants and young children with plans to improve the quality of private and social housing stock – particularly addressing issues of damp and affordability.

Economy

- With regards to future proofing the Medway Local Plan, we would encourage consideration of the potential for local economic partnerships to build public health outcomes routinely into plans to foster economic growth.

Tourism

- We would welcome any actions which support opportunities for visitors and residents to be more physically active and to spend more time in the natural and built environment, in light of the evidence for benefits to physical and mental health this can bring.

Retail, commercial leisure & town centres

- We would encourage consideration of equitable access to commercial physical environments that facilitate walking, cycling and mobility.
- Consideration needs to be given to the impact of street furniture in such settings to enable older people and families with young children to safely navigate through the commercial space.
- Consideration should also be given to regular opportunities for older people, young families and people with disabilities to be able to sit safely in public spaces.
- Ensuring that there are regular opportunities for people to access clean, safe toilets, which is an important factor that can limit accessibility particularly for older people.
- We would applaud any additional opportunities to extend leisure facilities which encourage affordable active lifestyles, such as children's play areas and skate parks. This should be considered alongside opportunities through the built environment to increase walking and cycling.

Environment

- It is positive to see Medway's recognition of the need to protect and enhance the natural environment in light of the benefits it can provide in the form of providing open space to relax, exercise and learn. We would support the suggestion in s11.10 to consider opportunities to promote greater access to the river and would

encourage consideration of how to maximise opportunities for promoting active travel whether through walking or cycling and greater use more generally of open spaces by the whole population.

Build environment

- With regards the characteristics that make a place good to live, in addition to the promotion of active travel through enabling greater levels of walking and cycling and the additional points raised under 'Retail, commercial leisure & town centres' section above, we would note the importance of designing space that promotes social interaction, considers walkability, promotes active travel, ensures adequate street lighting to improve safety and the perceptions of safety and takes in to account the value of green space and natural light in fostering mental wellbeing.
- New buildings should ensure public health considerations are born in mind such as through designs that promote the use of stairs rather than lifts through lay out and signage.

Rural issues

- A key issue is ensuring families and individuals are connected with communities, facilities and services. Therefore consideration should be given to supporting access to regular and affordable public transportation, integrated with opportunities for active travel elements where feasible.

Infrastructure and services

- We commend the inclusion as a key objective for the plan the promotion of a healthier Medway and opportunities to support healthier lifestyle choices through access to nutritious food, walking, cycling and exercise as engagement in community life.
- Similarly we commend the intentions to provide secondary care services in community and home settings and promote availability of telecare services. Consideration should be given to ensuring equitable access for the whole eligible community.

Social and community infrastructure

- We would emphasise the importance of the insights and recommendations within this section, particularly regarding the need to ensure plans take in to account changing demographics and the implications of this to community needs.

Open space

- It is positive to see Medway's recognition of the importance of open space as a community resources and the benefits that this can deliver and we would encourage full consideration of opportunities to maximise opportunities for this through the plan, for the benefit of local people's physical and mental health.

- Given the strong evidence of growing rates of childhood and adult overweight and obesity, we could strongly encourage Medway to secure existing facilities which support physical activity and to seek opportunities to address shortfalls.

Air Quality

- The plan should consider traffic management in the AQMA to reduce NOx, such as reduced speed areas, emission control for commercial vehicles, location of charging points for electric vehicles and/or other similar controls.

Waste

- We would support initiatives to increase the recycling rates both for household and commercial streams.
- We would encourage plans to manage the waste processing as close to its source as possible, and to explore all options of waste treatment as well as relocation of existing waste transfer stations

Sustainability and climate change/Flood risk

- We would encourage the plan to consider the effects of localised flooding, particularly surface water flooding.

Transport

- We would support plans to enable regular and safe walking and cycling for local people through development and adaption of pathways, cycle routes, signage and traffic management that supports safer cycling throughout Medway.
- We would also encourage plans which aim to reduce community severance through traffic calming, and redesign of road systems in and around neighbourhoods.

Name: Kevin Bown

Reference

82

Organisation

Highways England

On Behalf Of

Type of Consultee

Government/Public Body

From: [REDACTED]
Sent: 29 February 2016 12:02
To: policy, planning
Cc: Planning SE
Subject: Highways England response re Medway Local Plan - Notice of Regulation 18 'Issues and Options' Consultations

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sirs

Thank you for your letter dated 4 January 2016 on the Medway Local Plan Regulation 18 Issues and Options public consultation. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of Medway the SRN within the authority boundary comprises the M2; however, movements generated within or towards Medway affect a much wider area within and beyond Kent and hence impact on both the SRN and local road networks.

We have held meetings with Medway Council in August and October 2015 and February 2016 to discuss potential approaches to assess the transport impacts of any forthcoming development proposals over and above already consented developments that will form the basis of your Local Plan. We are happy to continue consultation under the duty to cooperate and supply any further advice should you require us to do so. We broadly support the requirements for sustainable transport solutions and the need to examine capacity to accommodate development.

We note the general nature of the "issues" identified in the document, and hence do not have any "objections" as such to it.

Looking forwards, any future iterations of the plan, but particularly at the Publication stage, will need to have carefully modelled, assessed and proposed appropriate mitigation regarding the impact of the scale, location, mix, interaction between and timing of development on the SRN and local networks. The plan will especially need to fully understand, explain and manage the traffic implications of any preferred individual and cumulative mix of housing and employment. This is partly because there appears to be considerable out commuting at present. Should you be looking to redress the balance you will need to assess the resultant transport implications. Care may be needed to address the types of employment and employment development likely to reduce out-commuting and minimise the levels of in-commuting.

We also note your observations of traffic congestion in relation to the M2 and M20, plus some sections of the A2 operating beyond notional capacity (paragraph 25.7). As different parts of the A2 are either SRN or local network, it would be helpful if you could clarify the sections of the A2 to which you are referring.

We hope you find these comments useful. Please do not hesitate to contact us if you require further information.

Regards

Kevin Bown

Highways England | Bridge House | 1 Walnut Close | Guildford | GU1 4LZ

Tel: +44 (0) 300 470 1046

Web: <http://www.highways.gov.uk>

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Consider the environment. Please don't print this e-mail unless you really need to.

Name: Tim Dean

Reference

83

Organisation

Dean Lewis Estates

On Behalf Of

Type of Consultee

Developer/Consultant

**Medway Council Local Plan
Issues and Options 2012-2035**

**Consultation response
by**



February 2016

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APPENDICES

Appendix 1 - Site Location Plan

1 INTRODUCTION

1.1 Context

- 1.1.1 Dean Lewis Estates is a professional strategic land promotion company specialising in the delivery of residential development with associated community infrastructure. We have made separate representations to this consultation with regard to the strategic matters raised within the I&O document.
- 1.1.2 This document relates to a site specific submission in respect of land at Lower Rainham Road, Rainham.

2 SITE SUBMISSIONS

2.1 Introduction

- 2.1.1 Dean Lewis Estates support the promotion at Lower Rainham Road, Rainham, for inclusion within the Medway Local Plan as a housing allocation. For reference please see the site location plan attached at appendix 1.
- 2.1.2 The site is demonstrably sustainable and capable of helping meet Medway's housing growth needs together with a commensurate amount of community infrastructure.
- 2.1.3 At this juncture detailed assessments have not been carried out but wherever possible baseline information is provided that demonstrates that the site is suitable, available and deliverable for the type of development described above.
- 2.1.4 The following summary is provided in respect of the site submission.

Social

- ✓ **Deliverable Housing Site** – The site will make a valuable contribution to the 5 year housing land supply of Medway. The proposal will assist in providing the supply of housing required to meet the needs of present and future generations. The whole site is deliverable within the plan period.
- ✓ **Provision of Affordable Housing** – The site can deliver 25% policy compliant affordable homes. This is a significant material benefit given the chronic shortage of affordable housing across Medway.
- ✓ **Provision of Market Housing** – the site will provide for high quality market family housing which meets the identified need in Medway.
- ✓ **Access to Community Clubs, Youth and all age Sports Organisations** There are a range of clubs and societies available in Rainham and within the wider rural community. The proposals will help to support the vitality of these community groups and enhance community life.
- ✓ **Bus Service** – Rainham is well served by existing public transport which provides connections to wider services and facilities available in Medway. The best and most sustainable way of maintaining and improving bus

services is by additional customers using the existing routes and creating revenue for the Operators.

- ✓ **Public Open Space** – The development of this site will deliver formal and informal public open space benefiting both the new and existing residents whilst contributing to the health and well-being of the community.
- ✓ **New Pedestrian Links** – New pedestrian links through the site that provide immediate access to the existing settlement, providing for ease of movement thereby encouraging walking, cycling and bus travel.
- ✓ **Travel Plan** – The new development will assist in establishing travel habits that concentrate on reducing reliance on the private car. The travel plan measures will be deployed from the outset of occupation of the development.

Economic

- ✓ **Population Growth** – An increase in population within Rainham will help to sustain and support its role as key town and will reinforce its' vitality and viability, its businesses, services and facilities.
- ✓ **Labour Force Supply** – The development will provide additional people of working age that, as economically active residents, will help to support the sustainability of Medway's economy.
- ✓ **Construction Jobs** – Full Time Equivalent (FTE) employment opportunities will directly arise from the site construction together with supply chain job opportunities.
- ✓ **Resident Expenditure** – Residents would generate annual household expenditure of that will boost the local economy.
- ✓ **New Homes Bonus & Council Tax** – Medway council be the recipient of significant funds arising in respect of the New Homes Bonus and future revenue from Council tax, all of which will help sustain essential facilities and services Medway.

Environmental

- ✓ **Ecological Benefits** – The development site presents the opportunity for biodiversity enhancements. The site is presently predominantly used for horse pasture. It is of low ecological value. The provision of new green infrastructure within the development will enhance ecology.
- ✓ **Biodiversity** – The development proposals will greatly enhance Flora and Fauna helping to compliment the nearby nature reserve.
- ✓ **Flooding Betterment** – The development proposals will discharge surface water from the site into a sustainable drainage system at less than Greenfield run-off rates therefore helping to reduce flood risk.

APPENDIX 1

SITE LOCATION PLAN

Land off Lower Rainham Road, Rainham



Name: Gill Moore

Reference

84

Organisation

On Behalf Of

Type of Consultee

Charity/Community/Faith Group

Planning Policy

Friends of the North Kent Marshes

Regeneration Community &
Culture

c/o Woodlands

High Halstow

Medway Council

Nr Rochester

Gun Wharf

Kent

Chatham

ME3 8SX

ME4 4TR

29th Feb 2016

Medway Council Local Plan – Issues and options 2012-2035

Response from Friends of the North Kent Marshes

Friends of the North Kent Marshes is a voluntary group, formed in 2004 out of the No Airport at Cliffe Campaign Liaison Group, following the successful fight against the proposals for an airport at Cliffe. The North Kent Marshes stretch from Dartford in the west to Whitstable in the east and include the Hoo Peninsula, the River Thames, the River Medway, the Swale and Isle of Sheppey. They are some of the most unspoilt landscapes in Kent and are very rich in wildlife. Our aim is to promote the Marshes and the ways in which everyone can enjoy them. We work both with the local communities that live on and around the Marshes, and with groups such as the RSPB as they develop flagship visitor sites here. The area faces many threats as pressure for land and development in the southeast continues. We welcome the opportunity to respond to the Medway Council Local Plan – Issues and options 2012-2035 consultation.

We have concerns that 5.3 point 3 of developing a vision for Medway could be seen as ambiguous.

“5.3 The vision must respond to the key issues and opportunities that Medway faces over the next twenty years. These include:

- *Accommodating the projected growth of an 20% increase in Medway’s population, and its changing demographics*
- *Realising opportunities to drive economic success and addressing inequalities across Medway*
- *Developing a modern Medway, delivering quality through regeneration and investment, whilst protecting the best of its past and its natural environment”*

It could be construed that only “***the best of its past and its natural environment***” would be protected. There are many natural and cultural heritage sites within Medway both designated and undesignated that are of great importance to local people and any inference in the vision that these may not be important or protected is very misleading. Indeed Medway’s regeneration cannot take place at the expense of our rich and diverse natural and cultural heritage, it would destroy Medway’s greatest assets and our very sense of place.

The Medway Council Local Plan must ensure that there is no adverse effect on designated European and domestic sites of nature conservation. A substantial part of the north of the Medway Plan area fronts the Thames and Medway estuaries that are designated North Kent Marshes Special Protection Area (SPA). There are other important designated habitats such as Special Areas of Conservation, Marine Conservation Zones and Sites of Special Scientific Interest in and around Medway.

We welcome Medway's commitments to

- implement future strategic recreational disturbance mitigation in respect of any impacts on the SPA (paragraphs 6.7 & 26.8 of the consultation document) and to
- secure and strengthen the natural environment in Medway (paragraph 11.1)

Expansion of the footpaths network PRow gaps need to be carried out Footpaths between the villages and also to and from the urban environment should be developed where possible. Links to the Rivers Thames and Medway need to be enhanced but with special regard to ensure no disturbance to sensitive wildlife sites.

Heritage

Medway's historic environmental assets, both designated and undesignated are important in their own right. They are important for the tourism industry in Medway and because they create a sense of pride and a sense of place for residents. We are pleased that the plan recognises the value of the medieval cores of Medways villages; we note that Cliffe has one of the finest collections of listed buildings on the Hoo Peninsula and that the thirst for knowledge about our villages is on the increase.

Conservation areas in the towns and villages are important if we are to protect Medway's listed buildings and their settings. More areas could be considered for designation and boundaries extended to include the 'setting' of the area not just the area itself.

Agricultural land:

The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non food crops for future generations.

Our highest grade and most productive agricultural land is a national resource: in a volatile world with future possible food shortages due to climate change, war etc. it would be short sighted and fool hardy to destroy this valuable asset which cannot be replaced, we must protect this vital food supply for future generations.

Medway has a rich farming heritage and many of its farming families have farmed here for centuries. Our local farms must be kept viable, not turned into housing estates, as they are a source of employment for local people. Our farming families contribute much to our local communities and to village life.

Landscapes

Key landscapes should be protected from development issues of setting need to be considered if development is considered

Kindest regards

Gill Moore Joan Darwell Friends of the North Kent Marshes

Name: Emma Wreathall

Reference

85

Organisation

Barton Willmore

On Behalf Of

Taylor Wimpey south East

Type of Consultee

Developer/Consultant

MEDWAY COUNCIL LOCAL PLAN

ISSUES & OPTIONS CONSULTATION

2012 – 2035

RESPONSE TO PUBLIC CONSULTATION
ON BEHALF OF
TAYLOR WIMPEY UK LTD

February 2016

**MEDWAY COUNCIL LOCAL PLAN
ISSUES & OPTIONS CONSULTATION 2012-2035**

RESPONSE TO PUBLIC CONSULTATION

**ON BEHALF OF
TAYLOR WIMPEY UK LTD**

Project Ref:	22372/A5
Status:	FINAL
Issue/Rev:	02
Date:	February 2016
Prepared by:	Christopher Collett/ Emma Wreathall
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Date: 29 February 2016

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Appendix B: Objective Assessment of Housing Need: Critical Review (Barton Willmore, February 2016)

Appendix C: Objectively Assessed Housing Need: Dashboard (Barton Willmore, February 2016)

1.0 INTRODUCTION

i) Purpose of these Representations

- 1.1 These representations are submitted on behalf of Taylor Wimpey UK Ltd in response to Medway Council's (MC) Local Plan Issues and Options 2012 – 2035 Consultation Document (LPIO, January/February 2016). Taylor Wimpey is the owner of a Site known as 'Land at Mill Hill, Gillingham' (hereafter referred to as 'the Site'). A Site Location Plan is included at **Appendix A**.
- 1.2 The Site comprises two land parcels located to the east of A289 Yokosuka Way and to the east of Gillingham, both in sole ownership of Taylor Wimpey. In total, the parcels comprise 3.78 hectares. Further detail on the Site is provided in Section 10.0 of these representations.
- 1.3 **Notwithstanding our Clients' specific land interests, these representations have been prepared** in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework (NPPF) (March 2012), National Planning Practice Guidance (PPG) (March 2014) and the Consultation on Proposed Changes to National Planning Policy (December 2015).

ii) Purpose of the LPIO

- 1.4 The LPIO document advises that the current consultation is in advance of the preparation of a new Local Plan, and therefore is not a formal Regulation stage under the Town and Country Planning (Local Planning) Regulation 2012 ('the Local Planning Regulations'). The Local Development Scheme 2015-2018 (November 2015) anticipates that a "Preferred Options" consultation will be undertaken in January to February 2017, forming the first formal stage in **the Local Plan's preparation** (under Regulation 18 of the Local Planning Regulations).
- 1.5 Paragraph 1.2 of the LPIO confirms that the document does not set out detailed policies or identify specific sites for development. Rather, it represents key contextual matters that will be the drivers for the new Local Plan, for which the increasing population in Medway is considered to be most central. There are 22no. matters in the LPIO and a number of questions posed for each matter.

1.6 The LPIO considers a number of potential approaches that could be taken to form a development strategy for the new Local Plan. These include the following:

- High density town centre and riverside development;
- Incremental suburban development;
- Planned growth of existing settlements;
- Freestanding settlements;
- Urban extensions;
- Role of custom and self-build housing; and
- Approaches to the town centres.

1.7 Whilst the consultation is welcomed, it should be recognised that the LPIO does not contain any detailed policies or identify specific development sites (excluding reference to the unknown outcome of Lodge Hill) that can be assessed, and therefore due to the broad nature of the questions posed, the benefit of the consultation responses to MC will be limited in this regard.

1.8 It should also be noted that the LPIO has not been accompanied by a suite of up-to-date Evidence Base documents to inform the production of the new Local Plan. The Strategic Housing and Economic needs Assessment (SHENA), the only Evidence Base document due to be published alongside the LPIO, was not made publicly available until 19 February 2016, i.e. 6 weeks from the start of the consultation period and 1 week from its close.

iii) Contents of Representations

1.9 The LPIO has been assessed on the basis of the National Planning Policies as set out in Section 2. These representations are structured as follows:

- Section 2.0: National Planning Policy
- Section 3.0: Housing/Questions 4,5 & 6
- Section 4.0: Environment/Questions 30 & 32
- Section 5.0: Open Space/Question 52
- Section 6.0: Agricultural Land/Question 56
- Section 7.0: Transport/Question 72
- Section 8.0: Deliverability/Question 77
- Section 9.0: Development Strategy/Questions 81 & 82

1.10 In summary, these representations set out the following comments:

- The North Kent SHENA identifies the Objectively Assessed Need (OAN) for Medway as being 1,281 dwellings per annum (dpa) over the period 2012-2037 which does not represent the full OAN for Medway over the Plan period (2012-2035);
- The full OAN for Medway is 1,489 dpa in 2012-2035. This would need to be increased to 3,000 dpa for 2012-2035 to achieve the 744 affordable dpa identified in the North Kent SHENA;
- **Development at 'Land at Mill Hill, Gillingham' would constitute a sustainable form of development.** The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151);
- The future growth strategy for the Medway area should make a provision for development at the Site in the new Local Plan.

2.0 NATIONAL PLANNING POLICY CONTEXT

i) National Policy and Plan Making

2.1 The NPPF places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF (para 7). These include:

- **An economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **A social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **An environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

2.2 The presumption in favour of sustainable development, as set out in the NPPF, should be seen as a golden thread, running through both plan-making and decision-taking. Paragraph 14 directs for plan-making this means that:

- LPAs should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
 - Specific policies in the NPPF indicate development should be restricted.

2.3 Paragraph 182 of the NPPF advises that LPAs should "*submit a plan for examination which it considers is "sound" – namely that it is*":

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and;
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.
- (Para. 182).

2.4 Paragraph 156 of the NPPF states that LPAs should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- The homes and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- The provision of health, security, community and cultural infrastructure and other local facilities; and
- Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.5 The NPPF (para 157) considers that Local Plans should:

- Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- Be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- Be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;

- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- Identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- Identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- Contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. (Para. 157)

2.6 The NPPF (para 158) directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

2.7 The NPPF (para 159) directs LPAs to prepare an evidence base which indicates that objectively assessed needs for market and affordable housing are met. LPAs should plan for a housing mix **which takes into account "housing demand and the scale of housing supply necessary to meet this demand."** Household and population projections should also be a key consideration, taking into account of migration and demographic change.

ii) National Policy and Housing Need

2.8 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan **meets the full, 'Objectively Assessed Needs' (OAN) for market an affordable housing in the** housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.

2.9 LPAs must plan for a mix of housing that ***"meets housing and population projections, taking account of migration and demographic change"*** (para 159). Significant weight should also be placed on the need to support economic growth through the planning system (para 19).

- 2.10 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

(Reference ID: 2a-015-20140306)

- 2.11 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

iii) Duty to Co-operate

- 2.12 The 'Duty to Co-operate' as provided for in Section 110 of the Localism Act 2011, came into effect on 15 November 2011. The Duty was introduced under the 2011 Act to address the impact of the loss of the "top-down" effect from the Regional Spatial Strategy (The South East Plan) and to offer a transparent way in which authorities should relate to one another on cross boundary issues. The Duty is now shared between authorities requiring them to collaborate on cross-boundary matters and issues of sub-regional and regional importance, especially housing provision and related infrastructure issues.
- 2.13 Section 33A(2)(a) requires that local authorities "engage constructively, actively and on an ongoing basis" in the plan-making process. The NPPF refers to the 'Duty to Co-operate' in paragraphs 157 and 178-181. Crucially, paragraph 157 of the NPPF states that *"Local plans should be based on cooperation with neighbouring authorities..."*.
- 2.14 Paragraphs 178-181 are clear in directing LPAs as to the importance of the 'Duty to Co-operate' and the proactive approach necessary to ensure a collaborative approach to reflect individual Local Plans. Paragraph 179 states *"joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework"*.

- 2.15 Paragraph 182, as above, provides that an Inspector should assess *"whether the plan has been prepared in accordance with the Duty to Cooperate"* such that compliance with the Duty must also be reflected in the assessment of soundness.
- 2.16 In addition, the PPG contains considerable guidance on the Duty to Co-operate. This is largely due to the fact that the Duty to Co-operate has proved to be a contentious part of the NPPF, with numerous Local Plans being scrutinised at examination due to failure to fulfil the Duty.
- 2.17 The guidance emphasises the importance for LPAs to work together; stressing that *"Cooperation between local planning authorities, county councils and other public bodies should produce effective policies on strategic cross boundary matters. Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local planning authorities have approached others"* (Reference ID: 9-010-20140306).
- 2.18 The PPG also states that LPAs must *"engage constructively, actively and on an ongoing basis to maximise the effectiveness of the plan-making process"* (Reference ID: 9-001-20140306). The ultimate outcome of the engagement should be the production of effective policies on cross boundary strategic matters.
- 2.19 In summary, there are two aspects to the 'Duty to Co-operate':
- 'Duty to Co-operate' – the s33A legal test is a 'process' preparation test. The Duty is incapable of modification at an Examination. Therefore, this is one of the first things that has to be examined because, if the legal requirement is not met, then the Inspector must recommend non adoption of the Plan;
 - Collaborative Joint Working – an aspect of soundness. It is primarily concerned with the 'positively prepared' and 'effectiveness' soundness test set out in paragraph 182 of the NPPF. This relates to outcome rather than process.
- 2.20 The 'Duty to Co-operate' between LPAs is a clear requirement of national planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in paragraph 156 (para 178).

2.21 In addition, paragraph 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged (para 180). LPAs are required **to demonstrate how they have met the requirements of the 'Duty to Co-operate'** during the plan-making process (para 181).

3.0 HOUSING

Question 4 - Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

- 3.1 We do not consider that the approach and conclusions derived from LPIO, assessing the housing needs calculated for Medway over the Plan period have been appropriately assessed. We do not consider that the assessed housing need, as calculated by MC is “sound” and in line with National planning policy.
- 3.2 The NPPF directs LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and identify the scale, mix and range of tenures that the local population is likely to meet over the Plan period. In addition, LPAs should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land (NPPF, para 159).

i) Medway Council OAN Work

- 3.3 MC has jointly produced a North Kent SHENA with Gravesham Borough Council, comprising a Baseline Report (March 2015) and SHMA (November 2015).
- 3.4 The North Kent SHENA identifies OAN for Medway as being 1,281 dpa over the period 2012-2037 based on the result of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates. This level of housing need has been taken forward in the LPIO (January/February 2016) to represent over the period 2012-2035.
- 3.5 Barton Willmore Research has undertaken a critique of the OAN of 1,281 dpa (**Appendix B**) and does not consider it to represent full OAN for Medway over the Plan period (2012-2035) for the following reasons:
- There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dpa, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The

North Kent SHENA proposes no adjustment to account for this suppression. To comply **with the NPPF requirement to ensure Local Plans are 'positively prepared'** an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;

- The 2012-based CLG household projection is underpinned by the 2012-based Sub National Population Projections (SNPP) which assume very low net international migration to the UK (165,000 people per annum) compared with more recent trends (336,000 people in the last recorded year), an assumption which filters down to local **authority level and has been identified by recent Local Plan Inspector's decisions**¹. PAS Guidance also identifies how the net migration of the 2012-based ONS SNPP may well be an underestimate²;
- Furthermore, analysis of migration trends has identified that the net migration assumptions of the 2012-based SNPP (840 net migrants per annum, 2012-2037) is low in the context of a more recent 5-year trend given that net migration to Medway has increased over recent years;
- However, because it cannot be said with any certainty whether Medway is experiencing a reversal of trend in respect of migration, it is considered reasonable to use the 2012-based SNPP as the most appropriate demographic population projection at this point in time. However, if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase then it would be considered appropriate to change this approach;
- With the above points in mind, it is considered that the 2012-based SNPP should provide the very minimum projection of population growth in Medway;
- **The North Kent SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust.** However, we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The North Kent SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. It is considered that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support

¹ Paragraph 1.12, page 3, Arun District Local Plan OAN Conclusions, 02 February 2016

² Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

this conclusion. However, it is considered that the market signal uplift that is applied in the SHENA is insufficient given that it results in OAN that is still below the starting point estimate;

- The North Kent SHENA and LPIO (January/February 2016) identifies significant affordable housing need (744 affordable dpa, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court Judgments confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the North Kent SHENA does not address the significant affordable housing need in Medway.

ii) Barton Willmore OAN Work

3.6 Given the fundamental flaws identified in MC's own OAN assessment as above, BW Research has undertaken an assessment of MC's full OAN figure. The Report is contained at **Appendix C** and an overview is provided below.

3.7 The Report has been prepared in accordance with the requirements of the NPPF to ensure that the Local Plan meets the full OAN for market and affordable housing in the HMA. The report identifies that:

- The 2012-based household projection series, with adjustment rate of 3.3% to take account of vacant and second homes, equates to an unadjusted dwelling requirement of **1,324 dpa in 2012-2035**. In accordance with the PPG, this should only be regarded as the 'starting point estimate';
- If a 10 % uplift is applied to the 'starting point' estimate (in line with the 'modest' uplift applied by Inspector in recent Examinations, e.g. Eastleigh) to address worsening market signals, then this would bring housing need up to approximately **1,456 dpa in 2012-2035**;
- The 'starting point estimate' is considered an underestimate of future housing need as its projects suppressed household formation rates in the 25-44 age group over the Plan period. When undertaking sensitivity testing specific to local circumstances to alleviate the suppression in this age group, the starting point estimate would need to be increased to **1,489 dpa in 2012-2035**;

- To achieve 774 affordable dwellings per annum identified in the North Kent SHENA (November 2015), based on the 25% affordable housing provision, the housing requirement would need to be close to **3,000 dpa for the Plan period (2012-2035)**.

3.8 It is considered that the figure of 1,489 dpa for the Plan period would represent the full OAN for Medway, in order to take account of the latest ONS population projections in accordance with the PPG (Reference ID: 2a-017-20140306).

3.9 Overall, it is considered that the LPIO (January/February 2016) does not seek to meet the full and correct OAN for Medway. This matter should be addressed before the next iteration of the **Local Plan as the current position is “unsound”**.

iii) Under Delivery of Housing

3.10 The Consultation on Proposed Changes to National Planning Policy (CPCNPP) (December 2015) indicates that CLG are intending to amend National planning policy to ensure appropriate action is taken where there is a significant shortfall between the homes provided for in Local Plans and the houses being constructed. A housing delivery test is proposed (as outlined in the Spending Review and Autumn Statement 2015 (HM Treasury, November 2015)). It is envisaged that this approach would compare the number of homes that LPAs set out to deliver in its Local Plan against the net additions in housing supply within the LPA area (CPCNPP, para 30). Consequently, LPAs shall have to ensure that OAN figures are suitably robust and achievable in line with current National planning policy and the emphasis that is being placed on delivery rates.

3.11 This matter is particularly pertinent for MC following a recent Appeal Decision (APP/A2280/W/15/3002877) in which the Planning Inspector concluded that the substantial shortfall in previous years in housing delivery when set against the housing requirements, represented persistent under delivery (NPPF, para 47).

3.12 The CPCNPP considers that continued significant under-delivery of housing identified over a sustained period, as is the case for MC, should be addressed by appropriate action. The CPCNPP considers that one approach to addressing under delivery rates could be to identify additional sustainable sites if it has been shown that the existing approach is not delivering the housing required. Such sites would need to be in sustainable locations, with appropriate infrastructure available and which can be demonstrated as deliverable. To deliver such an approach, it is recognised that collaboration between developers and local communities, undertaking

appropriate consultation would be required to undertake policy reviews, enabling additional land in sustainable locations to come forward (CPCNFF, paras 31 – 33).

Question 5 – What do you consider to be the appropriate housing market area for Medway?

- 3.13 The SHMA (November 2015) defines the Housing Market Area to comprise Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling.
- 3.14 MC should seek to work collaboratively under the 'Duty to Co-operate' to address the housing needs of neighbouring authorities and how housing can be delivered in the HMA that is influenced by other HMAs.

Question 6 – Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

- 3.15 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012-2037), the Local Plan period (2012-2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744 dpa), which would constitute 58% of MC's identified OAN figure of 1,281 dpa. The PPG advises that an increase in the total Local Plan housing figure should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).
- 3.16 The need for affordable housing should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be given to ensure sustainable development and the deliverability of the Plan (para 173).
- 3.17 We would consider that based on the North Kent SHMA (November 2015), seeking the provision of up to 25% affordable housing is appropriate. An increase of the housing requirement to meet the full OAN figure of 1,489 dwellings per annum, as discussed in Section 2.0, would both be in line with National policy (NPPF, para 47) and therefore "sound", and contribute to achieving a greater number of affordable dwellings.

4.0 ENVIRONMENT

Question 30 – What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

- 4.1 The NPPF (para 109) directs that the planning system should contribute to and enhance natural and local environment by a number of means, including protecting and enhancing valued landscapes and minimising impacts on biodiversity and providing net gains in biodiversity, where possible. In plan-making terms, the NPPF (para 110) advises that the aim should be to minimise pollution and other adverse effects on the local and natural environment, and plans should allocate land with the least environmental or amenity value, where consistent with other policies in the NPPF.
- 4.2 Therefore, in order to be consistent with National policy, the new Medway Local Plan should allocate land for development which is of the least environmental or amenity value where consistent with other policies in the NPPF in order to minimise any adverse effects.
- 4.3 **As part of the now withdrawn Core Strategy, Medway Council produced 'Further Considerations of Strategic Mixed Use Development Options' (September 2013) to assess the potential development options for the area. Land North of Rainham (Option 5) is one of the identified options and this includes the Site (Appendix A).**
- 4.4 Whilst the Site is currently outside of the built up area in the Medway Local Plan (2003), it has previously been considered (as part of a larger area) as a potential option for strategic development. MC through its own assessment considered that Option 5 (North Rainham, including the Site) would have no direct impact on the AONB, Ancient Woodland, Scheduled Ancient Monuments, Public Open Space or SPA, Ramsar and SSSI designated sites. Whilst it is noted that a Riverside Country Park is adjacent to the Site, the Site is also capable of accommodating some on-site open space to mitigate indirect development pressures on the Medway Estuary and Marshes SSSI, SPAA and Ramsar as necessary.

Question 32 – What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

- 4.5 Paragraph 113 of the NPPF directs that distinction should be made between the hierarchies of international, national and locally designated sites by setting criteria-based policies, so that protection is proportionate with such status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks or landscape areas.
- 4.6 The Site is not subject to any International or National landscape designations and therefore its development should be considered proportionate to this context, in accordance with the NPPF.
- 4.7 The Site is however locally designated as an Area of Local Landscape Importance (ALLI) in the Medway Local Plan (2003). The designation is currently drawn tightly around the settlement boundaries of both Rainham and Gillingham, and under the terms of the policy development will only be permitted if it does not materially harm the landscape character and function of the area; or the economic and social benefits of development outweigh the benefits of conserving the landscape.
- 4.8 It should be noted that in a recent Appeal Decision (APP/A2280/W/15/3002877), the Inspector noted that Medway Landscape Character Assessment (MLCA) (2011), in seeking to recognise and protect areas of recognised local landscape character, was not inherently inconsistent with the NPPF, however “the ALLI designations were not based upon a landscape character assessment” (paragraph 23) and therefore did not fully accord with the NPPF in this respect.
- 4.9 To be ‘Consistent with National policy’, the new Local Plan for Medway should set ‘criteria based’ policies against which proposals in protected landscape areas can be judged. In order for the new Local Plan to be ‘Justified’ in this respect, we recommend that a Medway-wide landscape review is undertaken to inform both the spatial strategy for the area and landscape based policies.
- 4.10 Notwithstanding the above recommendation, the Site is capable of providing an appropriate area of open space as part of the development proposals and provide on-site mitigation measures to protect the most sensitive parts of the Site.

5.0 OPEN SPACE

Question 52 – Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

- 5.1 We consider that open space provision for new development should take a balance between the two approaches. The provision of on-site open space should be considered within the context of each development site, assessing the potential feasibility of a development site to provide for on-site open space provision or whether contributions towards maintaining and enhancing the existing estate is deemed more appropriate.

6.0 AGRICULTURAL LAND

Question 56 – What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

- 6.1 The NPPF (para 112) directs that LPAs should take into account the benefits of the best and most versatile agricultural land. Where significant development is necessary on agricultural land, LPAs should seek to use areas of poorer quality land in preference to that of higher quality.
- 6.2 It is acknowledged that the SLAA (November 2015) identified the Site to be located on the best and most versatile agricultural land. It is noted that nearby proposed developments at Land North of Moor Street (APP/A2280/W/15/3012034) and Land at Otterham Quay Lane (APP/A2280/W/15/3139962) have been subject to further survey work which established that the sites are predominantly Grade 2 agricultural land, not Grade 1 as originally envisaged.
- 6.3 It should be noted that the NPPF (para 112) does not preclude development on the best and most versatile land, but a preference is stated for development on poorer quality land where possible. As noted in the context of LPIO's Question 56, regard should be given to the context of sustainable locations to accommodate growth and the overriding presumption for sustainable development in the NPPF as a whole (para 14). Therefore, as part of the new Local Plan, consideration must be given to the sustainable location of the Site and its contribution to the achievement of sustainable development (NPPF, para 151).

7.0 TRANSPORT

Question 72 – What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

- 7.1 The NPPF (para 29) highlights the importance for the transport system to be balanced in favour of sustainable transport modes and providing users with a choice on how they travel, whilst acknowledging that different opportunities and measures will be required from urban to rural areas.
- 7.2 The new Local Plan for Medway should contain both transport policies and development allocations that support the achievement of sustainable development by locating new development within or adjacent to existing built up areas where existing infrastructure is in place.
- 7.3 The Site is located adjacent to the boundary of the Medway urban area and is therefore in a sustainable location with good access to existing services and public transport opportunities, as acknowledged within the SLAA (November 2015). This is therefore in line with paragraph 29 of the NPPF.
- 7.4 The Site is served by a variety of modes of transport, including cycle and public transport, in addition to the private motor car. Bus Route 190 passes north of the Site along Lower Rainham Road and National Cycle Network Route 1 extends north of Lower Rainham Road to the north east of the Site.

8.0 DELIVERABILITY

Question 77 – Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

- 8.1 We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account different viability between areas of Medway.
- 8.2 The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened"* (NPPF, para 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing, when taking account of the normal cost of development and mitigation, should provide competitive returns to a landowner/developer to enable the development to be deliverable.

9.0 DEVELOPMENT STRATEGY

Question 81 – Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

- 9.1 The pattern of residential development entitled 'incremental suburban development' states that incremental growth can make local improvements more difficult. This type of development can provide a credible contribution to the area's development needs alongside other development type options. Funding contributions can be secured in accordance with the Community Infrastructure Levy Regulations 2010 where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.
- 9.2 These planning obligations provide opportunities to improve existing facilities and services to make development acceptable in planning terms and a variety of development types are needed to meet the area's development needs.

Question 82 – Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

- 9.3 We consider that a range of development types, as outlined within the LPIO (January/February 2016), should be utilised in meeting Medway's growth requirements. This should be based on an overarching vision of sustainable development, as underpinned by National planning policy. When selecting development types, it is important to consider the aspiration and requirements of National policy.
- 9.4 The NPPF encourages LPAs in plan-making to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. LPAs should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community that is required in particular locations (NPPF, para 50).
- 9.5 The Site would assist in the provision of a sustainable, inclusive and mixed community on land located in immediately adjacent to the existing Medway urban area and its established services and public transport opportunities.

- 9.6 North Rainham was one of a limited number of areas that were assessed as a realistic option for strategic housing growth as part of the previous Core Strategy (Medway Core Strategy Major Sites Assessment, October 2013). This demonstrates that the LPA seriously considered growth in North Rainham to help Medway meet its housing need. The scope of the assessment was to identify whether areas such as North Rainham could be a reasonable alternative to development at Lodge Hill.
- 9.7 Strategic development at North Rainham was discounted at this time over concerns that the area was insufficiently sized to provide a reasonable alternative to Lodge Hill. Strategic expansion at North Rainham was also questioned for its deliverability and proximity to the Medway Marshes SPA and Ramsar site. The report notes that development could help reduce deprivation levels in Twydall.
- 9.8 **Expansion at North Rainham is considered to be an important component of meeting the area's** development needs and it is clear from the scale of land submitted for the SLAA (2015) that significant land is available. It is also considered that development pressures on the Medway Marshes SPA and Ramsar site can be mitigated through use of the Riverside Country Park and on-site measures. Development at the Site would provide an opportunity to deliver a significant residential development of approximately 100 **dwellings to assist in meeting Medway's housing** needs.
- 9.9 Further detail on the Site is contained in the subsequent Section of these representations.

10.0 LAND AT MILL HILL, GILLINGHAM

i) The Site and its Surroundings

- 10.1 The Site comprises two land parcels located in North Rainham to the east of A289 Yokosuka Way that forms the current eastern extent of Gillingham. Immediately to the west of A289 Yokosuka Way lies Grange Farm, which is a relatively recent residential development built by Taylor Wimpey. To the south of the Site is Invicta Business Centre the northern boundary of which is the North Kent (Canterbury to London) railway line. In total the parcels comprise 3.78 hectares (9.34 acres), both in sole ownership of Taylor Wimpey.
- 10.2 Parcel A as shown on the Site Location Plan (**Appendix A**) comprises an almost triangular piece of land immediately to the south of Lower Rainham Road (B2004) and to the east of A289 Yokosuka Way. The land parcel is currently in agricultural use with a number of farm buildings in the southern part of the site.
- 10.3 Land Parcel B lies to the south of Land Parcel A and also comprises an almost triangular price of land also in agricultural use and adjacent to A289 Yokosuka Way. Mature planting forms the boundary between the site and Yokosuka Way.
- 10.4 Parcels A and B are separated by Grange Road which terminates close to the boundary with A289 Yokosuka Way.
- 10.5 As such, whilst the Site is currently outside of the settlement boundary of the Medway urban area it is very close to both residential and employment development. Therefore, the Site lies within a sustainable location immediately adjoining the Medway urban area.

ii) Previous SLAA Assessments

- 10.6 Parcel B was assessed in the November 2010 SLAA as part of a wider site extending to south and east (Site Reference: 0774). The Site was rejected, along with others in the North Rainham area, on planning policy grounds and because it is greenfield (Parcel A, containing some previously developed land, was not part of the assessed site).
- 10.7 The Site was assessed in the November 2015 SLAA (Site Reference: 1073). The assessment concluded that the Site is unsuitable for housing development unless the identified constraints could be addressed.

10.8 In summary, the Site was assessed as follows:

- Good access to public transport opportunities;
- Likely that a suitable vehicular access could be created on to Featherby Road, Grange Road or Lower Rainham Road, directly adjacent to the Site;
- Development is unlikely to have an impact upon any designated heritage assets;
- Mitigation likely to be deliverable to overcome any air pollution constraints;
- Contamination is possible due to past uses, but mitigation is capable if found;
- Site is not designated open space or employment land;
- Level of flood risk on site is considered acceptable.

10.9 The constraint to development identified in the SLAA that led to the conclusion that it is **unsuitable for development was due to the Site's location on the best and most versatile agricultural land** and its inclusion in the Area of Locally Valued Landscape (Lower Rainham Farmland), which is considered sensitive to change and thereby development on the Site is **"likely" to have a detrimental impact upon such a designation.**

10.10 The NPPF (para 113) directs that LPAs should set 'criteria based' policies against which proposals in protected landscape areas will be judged. It should be noted that in a recent **Appeal Decision (APP/A2280/W/15/3002877)**, the Inspector stated that **"the ALLI designations were not based upon a landscape character assessment"** (paragraph 23) and therefore concluded it did not fully accord with the NPPF in this respect.

iii) Proposed Development

10.11 Taylor Wimpey are promoting the Site for residential use comprising a mix of dwelling types and sizes including an element of affordable housing. It is anticipated that approximately 100 dwellings could be delivered on the Site.

iv) Sustainable Development

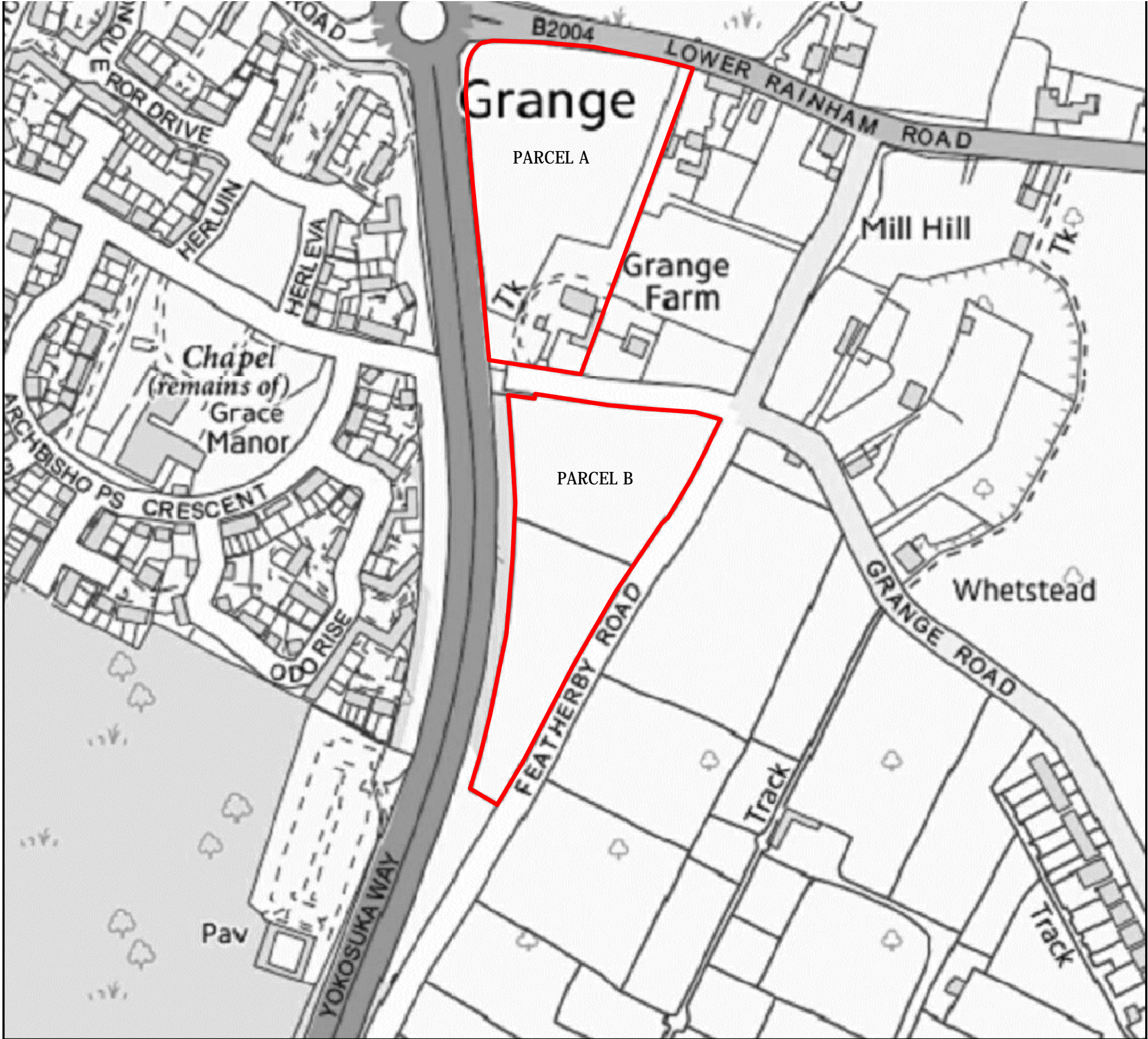
10.12 The NPPF and PPG both put sustainable development at the heart of the planning system (NPPF, para 7) for both plan-making and decision-taking, and describes it as covering three main aspects namely economic, social and environmental.

- 10.13 Development of the Site would constitute a sustainable form of development. The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151).
- 10.14 The Site is assessed to be sustainable development located adjacent to existing built residential development. The Site is accessible, located adjacent to an existing local road network and in close proximity to the strategic highway network and railway, with the M2 located approximately 4.8km to the south of the Site and Rainham Railway Station approximately 2.7km to the south-east of the Site. **The Site's development would form a relatively minor expansion** to the existing building development to the east and west of the Site.
- 10.15 The development would meet the three strands of sustainable development, as set out in the NPPF. Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has the potential to contribute towards the delivery of much needed housing within Medway and deliver a mix of housing types in accordance with the NPPF (para 47). The Site is currently available for development, would offer a suitable location for development and has a realistic prospect of housing being delivered on the Site within five year to meet short term development needs.

11.0 CONCLUSIONS

- 11.1 **Whilst we support Medway Council's intention to undertake a** form of public consultation a new Local Plan for the area, the LPIO (January/February 2016) **is limited in content and is "broad"** in the nature of questions it poses.
- 11.2 Based on the information available, we consider that there is further work to be done in order **to ensure MC is working towards a "sound" Local Plan. Notably, the current identified housing** figure needs to be revisited to identify the full OAN, as required by National policy.
- 11.3 It is considered that the figure of 1,489 dpa for the Plan period would represent the full OAN for Medway, in order to take account of the latest ONS population projections in accordance with the PPG.
- 11.4 It is also vital that the evidence base which should inform and underpin the Local Plan, is made available prior to any stage of formal consultation on the Local Plan. Without these, MC will be unable to make an informed decision on future growth strategies for the area, nor will the public be able to make informed comments which in turn would assist MC.
- 11.5 Development of the Site would constitute a sustainable form of development, immediately adjoining the Medway urban area. The proposed development of the Site, to provide approximately 100 dwellings, could help to address the persistent under delivery of housing as confirmed in a recent Appeal (APP/A2280/W/15/3002877). The Site is in the sole ownership of Taylor Wimpey and is suitable, deliverable, achievable and therefore developable for residential development and should be allocated accordingly in the new Local Plan.
- 11.6 The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151). Therefore, the future growth strategy for the Medway area should make a provision for development at the Site in the new Local Plan.

Appendix A
Site Location Plan (M01)



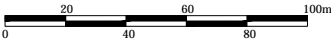
LEGEND

 Site Boundary



Project
**Mill Hill
Gillingham**
Drawing Title
Site Location Plan

Date 29.04.14	Scale 1:2500@A3	Drawn by HS	Check by KD
Project No 22372	Drawing No M01	Revision -	



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Appendix B

Objective Assessment of Housing Need: Critical Review (Barton Willmore, February 2016)

MEDWAY COUNCIL

OBJECTIVE ASSESSMENT OF HOUSING
NEED

CRITICAL REVIEW

Prepared on behalf of Taylor Wimpey

February 2016

MEDWAY COUNCIL
OBJECTIVE ASSESSMENT OF HOUSING NEED
CRITICAL REVIEW
Prepared on behalf of Taylor Wimpey
February 2016

Project Ref:	20894/A5/DU/DM
Status:	Final
Issue/Rev:	02
Date:	29 February 2016
Prepared by:	DM DU
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Date: 29 February 2016

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1.0 INTRODUCTION

- 1.1 This Technical Note has been prepared by Barton Willmore on behalf of Taylor Wimpey, in order to review the Objectively Assessed Housing Need (OAN) determined for Medway Council as set out in the Council's Strategic Housing and Economic Needs Assessment (SHENA). The SHENA has been prepared in partnership with Gravesham Borough Council, however in this review we focus on the OAN for Medway only.
- 1.2 The review presented here has been undertaken in the context of the policies of the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guidance (PPG) requirements that a full, unconstrained OAN is prepared.
- 1.3 The review is structured as follows:

Section 2 provides an outline of the relevant National Planning Policy Framework (NPPF), the supporting Planning Practice Guidance (PPG), and Local Planning Policy.

Section 3 reviews the latest official demographic evidence for Medway, including:

- Latest ONS population and CLG household projections;
- ONS mid-year population estimates and past migration trends.

Section 4 provides a review of the SHENA in the context of the requirements of PPG's Housing and Economic Development Needs Assessment guidance (ID2a).

Section 5 summarises our critique of the SHENA to recommend an appropriate way forward in assessing overall housing need for Medway.

2.0 PLANNING POLICY CONTEXT

A) NATIONAL PLANNING POLICY

i) Introduction

- 2.1 The National Planning Policy Framework (NPPF, 27 March 2012) and the accompanying Planning Practice Guidance (PPG, 06 March 2014) set out the requirements within which local planning authorities should be setting their overall housing targets as part of a full objective assessment of overall need. These requirements are summarised below.

ii) National Planning Policy Framework (27 March 2012)

- 2.2 NPPF sets out the Government's planning policies for England and how these are expected to be applied. NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the Country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).
- 2.3 In respect of delivering a wide choice of high quality homes, NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).
- 2.4 Furthermore, it states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (paragraph 50).
- 2.5 With regard to plan-making, local planning authorities are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156).
- 2.6 NPPF states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework (paragraph 157).

- 2.7 Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of and strategies for housing and employment uses, taking full account of relevant market and economic signals (paragraph 158).
- 2.8 For plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should:

“prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries; The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

meets household and population projections, taking account of migration and demographic change;

addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).”¹

iii) Planning Practice Guidance (PPG, 06 March 2014)

- 2.9 PPG was issued as a web based resource on 6th March 2014. Guidance on the assessment of housing development needs (PPG ID: 2a) includes the SHMA requirement set out in NPPF and supersedes all previous published SHMA practice guidance (CLG, 2007).
- 2.10 The primary objective of the housing development needs assessment (the SHMA) is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002)
- 2.11 Housing need refers to the scale of housing likely to be needed in the housing market area over the plan period, should cater for the housing demand in the area and identify the scale of housing supply necessary to meet that demand. (PPG ID2a 003)
- 2.12 The assessment of need is an objective assessment based on facts and unbiased evidence and constraints should not be applied (PPG ID2a 004).

¹ Paragraph 159, National Planning Policy Framework, 27 March 2012;

- 2.13 Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

PPG methodology for assessing housing need

- 2.14 The full methodology is set out at ID 2a 014 to 029 (overall housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

Starting point estimate of need

- 2.15 The methodology states that the starting point for assessing overall housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends (ID2a 015).

"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing." (2a-015) (Our emphasis)

Adjusting for demographic evidence

- 2.16 The PPG methodology advises that plan makers may consider testing alternative assumptions in relation to the underlying demographic projections and household formation rates. It also states that 'account should be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates' (2a-017).

Adjusting for likely change in job numbers

- 2.17 In addition to taking into account demographic evidence the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems."
(2a-018)

- 2.18 The PPG also confirms the importance of ensuring sufficient growth in the working age population (16-64), at paragraph 2a-018 and 2a-21:

"Plan makers should make an assessment of the likely change in job numbers based on past trends and /or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area." (2a-018)

"When considering future need for different types of housing, plan makers will need to consider whether they plan to attract a different age profile e.g. increasing the number of working age people." (2a-021)

Adjusting for market signals

- 2.19 The final part of the methodology regarding overall housing need is concerned with market signals and their implications for housing supply (2a-019:020).

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." (2a-019)

- 2.20 Assessment of market signals is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards. Particular attention is given to the issue of affordability (2a-020).

"The more significant the affordability constraints ... and the stronger other indicators of high demand ... the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be." (2a-020)

Overall housing need

- 2.21 An objective assessment of overall housing need can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.

2.22 The extent of any adjustment should be based on the extent to which it passes each test. That is:

- It will at least equal the housing need number implied by the latest demographic evidence,
- It will at least accommodate projected job demand; and,
- On reasonable assumptions, it could be expected to improve affordability.

Affordable housing need assessment

2.23 The methodology for assessing affordable housing need is set out at 2a-022 to 029 and is largely unchanged from the methodology it supersedes (SHMA 2007). In summary, total affordable need is estimated by subtracting total available stock from total gross need. Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

"The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments ... An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." (2a-029) (our emphasis)

B) LOCAL PLANNING POLICY

i) Medway Council Local Plan – Issues and Options 2012-2035 (January 2016)

2.24 The Medway Council Local Plan Issues and Options Plan (draft Plan) represents the first formal stage of the Local Plan process, and sets out a strategy for development in Medway up to 2035.

2.25 In respect of the OAN for Medway, the Plan states the following:

"The Government requires Local Planning Authorities to determine the objectively assessed needs (OAN) for housing in their strategic housing market areas. Work carried out for the North Kent Strategic Housing and Economic Needs Assessment (SHENA) in 2015 has analysed demographic, economic and market signal information to assess the quantity and types of housing that will be needed to meet the projected growth in households over the plan period. This concludes that the Local Plan needs to make provision for up to 29,463 new homes by 2035."²

² Paragraph 7.8, page 21, Medway Council Issues and Options Consultation Document, January 2016

- 2.26 The OAN determined by the Strategic Housing and Economic Needs Assessment (SHENA) equates to 1,281 dwellings per annum over the period 2012-2037, not the plan period (2012-2035). The Plan states how the Council is committed to planning positively to meet the development needs of Medway.
- 2.27 The study Barton Willmore presents here provides a full critique of the SHENA to evaluate whether the OAN is positively prepared in line with the requirement of the NPPF.
- 2.28 The Issues and Options Plan also identifies Medway as a major economic hub within the South East region and Medway's location within the Thames Gateway offers excellent opportunities to stimulate business growth.
- 2.29 A key issue for the Local Plan will be:

"To secure a successful economic base in Medway, providing a range of jobs for residents and securing sustainable growth without exacerbating the need to travel to access high quality job opportunities."³

- 2.30 Furthermore, the Issues and Options Plan outlines the scale of economic growth forecast for Medway as follows:

"To forecast the scale and nature of economic growth anticipated in Medway over the plan period, calculations have been carried out based on an assessment of the population growth projections, the strengths of the local economic, knowledge of growth sectors, and impacts of major strategic developments such as London Paramount. The research has forecast a growth of around 17,200 new jobs in Medway up to 2037. Over half of these jobs are expected in non-B class activities, such as retail and healthcare."⁴

C) SUMMARY

- 2.31 The NPPF and PPG requires that in planning for future levels of housing, local authorities should boost significantly the supply of housing in their area that meets in full, the objectively assessed need for market and affordable housing. In doing so local authorities should;
- identify a scale of housing that meets household and population projections;
 - account for migration and demographic change in formulating housing requirements;

³ Paragraph 8.18, page 32, Medway Council Issues and Options Consultation Document, January 2016

⁴ Paragraph 8.19, page 32, Medway Council Issues and Options Consultation Document, January 2016

- ensure that assessment of, and strategies for, housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals; and
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing.

2.32 The following sections of this report provide an analysis of the starting point in objectively assessing overall housing need according to PPG – official ONS and CLG projections and estimates – and a full review of the SHENA and the OAN it determines for Medway. This will enable us to reach a conclusion as to whether the SHENA provides for full OAN.

3.0 HOUSEHOLD DEMOGRAPHICS

- 3.1 The PPG advises that the starting point for estimating overall housing need should be the latest household projections produced by the Department for Communities and Local Government (CLG) and that account should be taken of the most recent demographic evidence, including Office for National Statistics (ONS) population estimates.
- 3.2 This section reviews the latest official ONS demographic and CLG household data for Medway. Comparisons are made alongside the South East region and the national average.
- 3.3 To align with the assessment of housing need in the Council's draft Plan and the SHENA, we provide our analysis in this section (where possible) based on the 23-year period 2012-2035.

i) Historic population growth – ONS Mid-Year Population Estimates

- 3.4 Medway is currently estimated to have a population of 274,000 according to the ONS 2014 Mid-Year Population Estimates. Since 2001 Medway's population has grown by 24,300 which is equivalent to a rate of 9.7%. Medway's rate of population growth is slightly lower than the national average (9.8%) and lower than the regional average (10.6%) as shown in Table 3.1.

Table 3.1: Historic population change (2001-2014)

	2001	2014	2001-2014 change	
			No.	%
Medway	249,700	274,000	24,300	9.7%
South East	8,023,400	8,873,800	850,400	10.6%
England	49,449,700	54,316,600	4,866,900	9.8%

Source: Mid-Year Population Estimates, Office for National Statistics

All figures have been individually rounded to the nearest one hundred and may not sum

Percentages have been calculated using unrounded numbers

- 3.5 Population changes as a result of net migration and natural change. Table 3.2 provides the detailed components of change for Medway.

Table 3.2: Components of population change – Medway

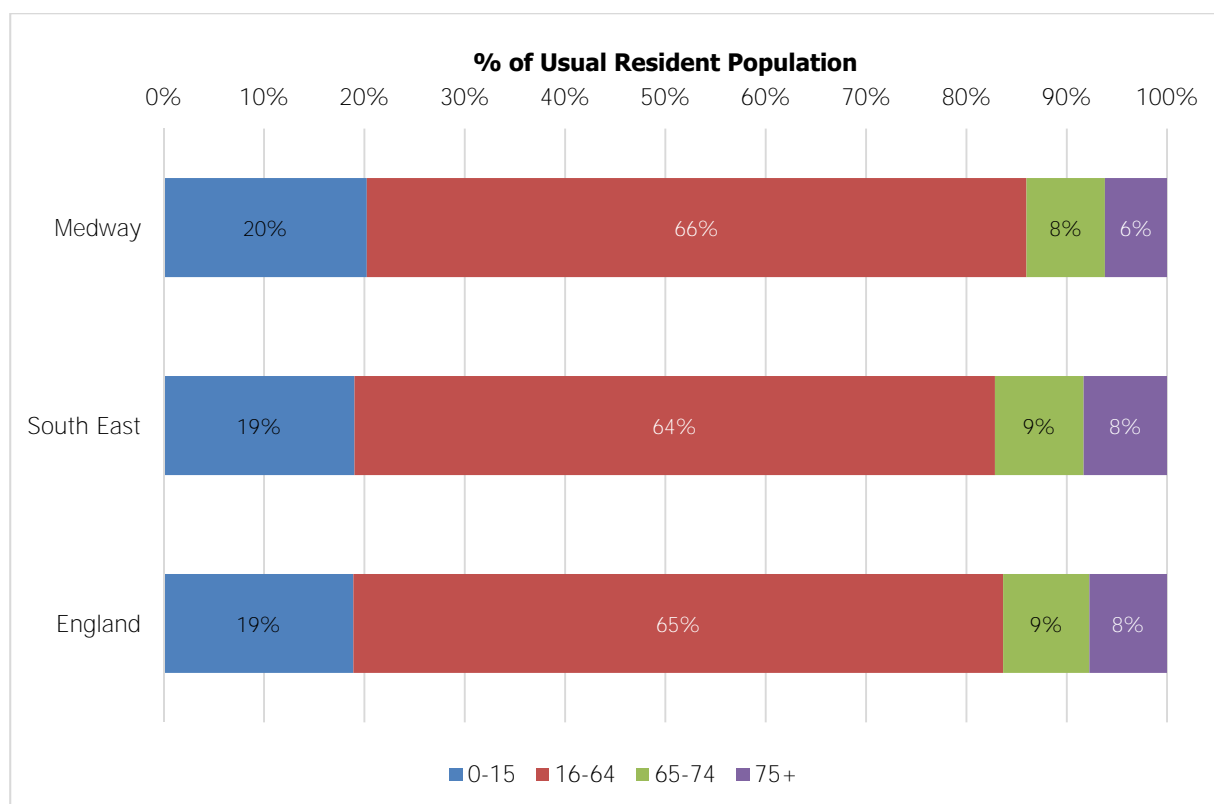
	Natural change	Net Migration	Other changes	Total change
2001/02	879	-250	-71	558
2002/03	1046	-270	121	897
2003/04	988	-782	94	300
2004/05	1,030	-691	300	639
2005/06	1,033	115	232	1,380
2006/07	1,247	969	130	2,346
2007/08	1,304	998	98	2,400
2008/09	1,383	374	249	2,006
2009/10	1,450	776	282	2,508
2010/11	1,539	652	-44	2,147
2011/12	1,546	1,793	-6	3,333
2012/13	1,452	1,280	155	2,887
2013/14	1,510	1,296	104	2,910
Average 2001/14	1,262	482	126	1,870
Average 2007/12	1,444	919	116	2,479
Average 2009/14	1,499	1,159	98	2,757
Average 2004/14	1,349	756	150	2,256

Source: Mid-Year Population Estimates, Office for National Statistics

- 3.6 At the start of the decade Medway experienced net outward migration. However, since 2005 net migration to Medway has been positive meaning that more people have moved to Medway than moved out.
- 3.7 Medway has also experienced positive natural change (more births than deaths) which has increased between 2001 and 2014. In addition there is positive 'other' change (change that is not possible to identify as either migration or natural change) equating to 1,640 people, or an average of 130 people per annum over the period 2001-2014.
- 3.8 Over the period 2001 and 2014, population change in Medway has largely been as a result of natural change (67%). However more recent trends reflect a shift in the components of population change as a result of net migration increasing considerably since 2011.

- 3.9 Medway has a younger age profile than the regional and national averages, with a larger proportion of the population aged 0-15 years and 16-64 years, as shown in Figure 3.1.

Figure 3.1: Age profile, 2011



Source: 2011 Census

ii) Office for National Statistics (ONS) population projections

- 3.10 The ONS produces population projections for all local authority areas in England. These are referred to as the Sub National Population Projections (SNPP) and are published by the ONS usually every two years.
- 3.11 The ONS SNPP are trend-based projections. That is, they project forward past demographic trends in births, deaths and migration. They do not take account of any future changes to government policy which may affect these past trends.
- 3.12 Table 3.3 sets out the official ONS SNPP in chronological order from the 2008-based series to the most recent 2012-based SNPP (29 May 2014). The 'interim' 2011-based SNPP and 2012-based SNPP take account of findings from the 2011 Census of the population. Growth is considered over the period 2012-2033 (2008-based) and 2012-2037 (2012-based). However, in line with the Medway Plan period, growth has also been considered over the period 2012-2035. The shorter period presented in respect of the 2008-based series is due to the projections finishing in 2033.

Table 3.3: ONS Population Projection series for Medway

Series	2012	2021	2033/35	2037		2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	268,200	290,500	322,700*	326,800		22,300 (2,480)	54,500 (2,370)	58,600 (2,340)
2011-based (interim)	267,300	290,300				23,000 (2,560)		
2008-based	257,600	269,700	286,300**			12,100 (1,340)	28,700 (1,370)	

Source: Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding

*2035; **2033.

- 3.13 The latest 2012-based SNPP project significantly higher population growth than the previous full 25-year projection series (the 2008-based SNPP) and marginally higher growth than the interim 2011-based series. This is expected given the analysis presented earlier in this chapter which shows net migration to Medway increasing in recent years.
- 3.14 Despite the 2012-based SNPP projecting the highest population growth, it is important to note that the 2012-based SNPP are underpinned by trends captured over the 2007-2012 period. This period was characterised by an economic recession and for this reason, resulted in atypical migration trends in some areas.
- 3.15 From reference to the 2012-based ONS SNPP components of change, the 2012-based ONS SNPP is underpinned by average net in-migration of 840 people per annum, 2012-2035. However, analysis of net migration trends from the period 2007-2012 from which the 2012-based SNPP trends are drawn puts average net migration at 919 people per annum. This compares to the most recent long-term trend (2004/5-2013/14) of 760 people per annum and the most recent 5-year trend (2009/10-2013/14) of 1,160 people per annum.
- 3.16 The analysis of migration trends for Medway therefore suggests a short-term trend in Medway is a prudent base from which to plan. However, whilst the most recent 5-year migration trend suggests higher net migration to Medway (largely influenced by the three most recent years) than the 2012-based SNPP, it is not possible to say with any certainty whether Medway will see a continued rise in migration. On this basis, the 2012-based SNPP are considered to provide a reasonable demographic projection for Medway.
- 3.17 However, the 2012-based SNPP are considered to represent the very minimum of future population growth in Medway given the 2012-based SNPP are considered to be conservative due to the national projections which underpin them. The 2012-based SNPP are constrained to the 2012 National Projections published in 2013. The national projection is based on an

assumption of 165,000 net international migrants coming into the UK per annum, and this assumption is projected forward per annum over the full 25 years of the 2012-based SNPP period. However net international migration of 165,000 people per annum conflicts significantly with the latest migration statistics report by the ONS, which shows net international migration of 336,000 people in the year ending June 2015, over double the 2012-based SNPP assumption.

- 3.18 The ONS appear to have noted this significant increase in net international migration, recently publishing the 2014 National Projections and assuming 185,000 net international migrants per annum. However this remains significantly lower than has been seen in the recent past. Although the forthcoming 2014-based ONS SNPP (expected May 2016) will project higher population growth across the country on the basis of these revised 2014-based National Projections, the assumption of 185,000 net international migrants per annum remains a very conservative estimate on the basis of recently recorded trends.
- 3.19 In this context the 2012-based SNPP are considered to be underpinned by assumptions which lead to a minimum level of population growth over the Plan period (2012-2035). Therefore the projected population growth presented in Table 3.3 is very likely to be conservative given that Medway is historically a net receiver of international migrants.
- 3.20 It is important to be aware of the issues related to the SNPP because the CLG household projections underpinned by the 2012-based SNPP. The household projections are derived by applying household representative rates to the ONS population projections. Household projections will be discussed in the next section.
- 3.21 The 2012-based ONS SNPP project the working age population to grow at a much slower rate than the population as a whole as is shown in Table 3.4. Given the extension of State Pension Age, there will be an increasing number of people working beyond the age of 64 years and therefore it is also important to consider the projected growth of the 65-74 year old population.

Table 3.4: Working Age Population Change, 2012-2035

Age Group	Medway
16-64	18,050 (10.3%)
65-74	11,900 (53.5%)
Total (16-74 years)	29,950 (15.2%)
Total (all ages)	57,800 (21.8%)

Source: 2012-based SNPP, Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding. Percentages calculated using unrounded numbers.

- 3.22 It is evident from Table 3.4 that the growth in the working age population (16-74 years) in Medway is heavily driven by the growth in the population aged 65-74 years (53.5% growth). Realistic assumptions need to be applied as to how greatly people over the age of 65 years can contribute to the resident labour force.
- 3.23 The PPG states 'where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns' (PPG, ID2a, 018). Whilst the 2012-based SNPP do project an increase in the working age population in Medway, further work is required in order to determine whether the level of workforce growth is sufficient to support the projected level of job growth.

iii) Communities and Local Government (CLG) household projections

- 3.24 Table 3.5 sets out the official CLG household projections in chronological order from the 2008-based series to the most recent 2012-based series (27 February 2015).

Table 3.5: CLG Household Projections for Medway

Series	2012	2021	2033/35	2037	2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	108,190	120,470	137,640*	139,950	12,280 (1,360)	29,450 (1,280)	31,760 (1,270)
2011-based (interim)	107,970	119,320			11,350 (1,260)		
2008-based	107,470	116,090	125,890**		8,620 (960)	18,420 (880)	

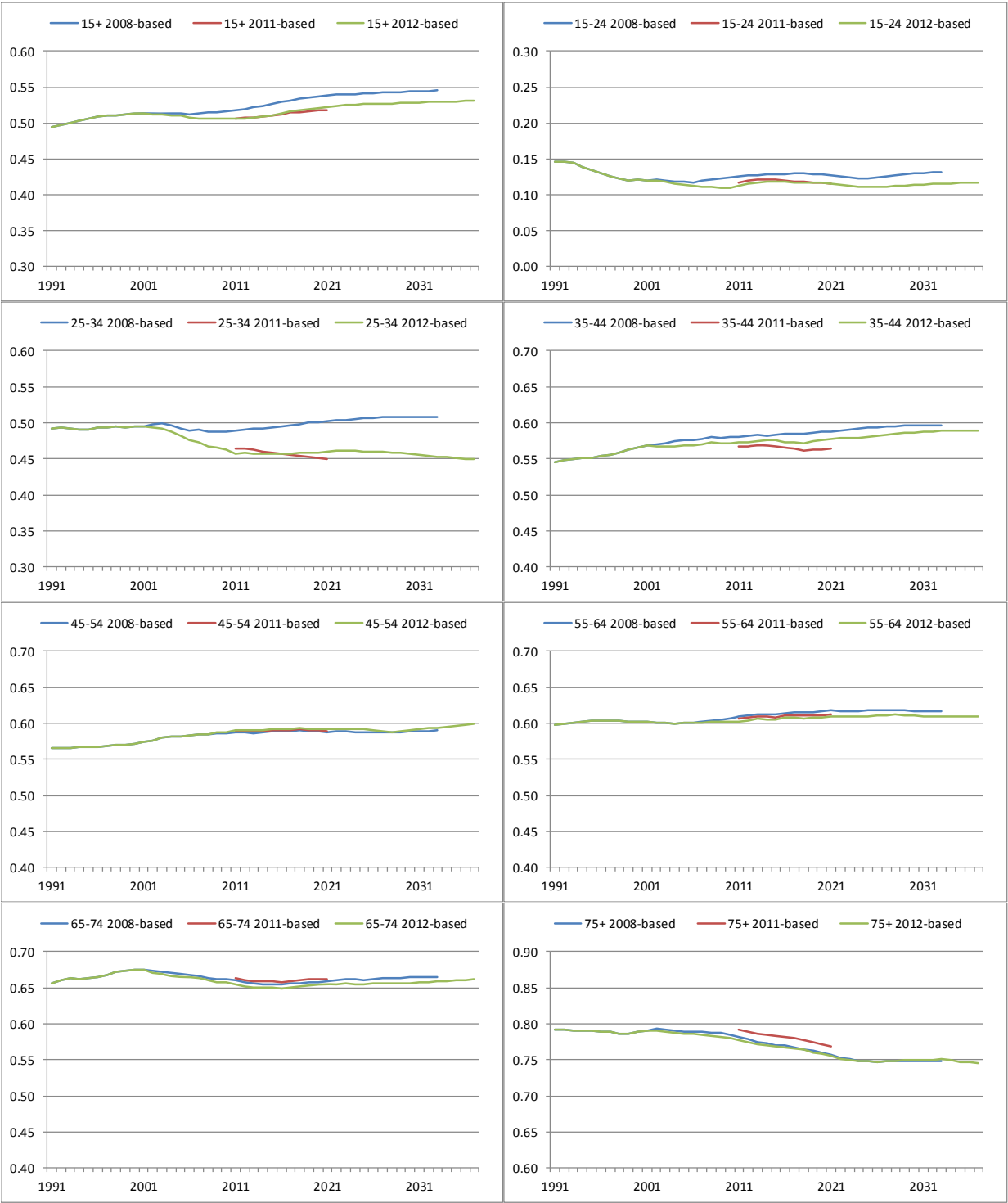
Source: (CLG) Communities and Local Government (rounded to nearest 100) Note: Figures may not sum due to rounding
 *2035; **2033

- 3.25 As the PPG states the CLG projections should form the 'starting point estimate' only of overall housing need as part of a full objective assessment of need. The latest CLG 2012-based household projections show growth of 1,280 households per annum in Medway over the Plan period (2012 and 2035). To reach a dwelling requirement, account needs to be taken of vacant and second homes. For Medway this rate is 3.27%⁵ resulting in a dwelling projection of 1,323 dwellings per annum, 2012 to 2035.
- 3.26 The growth projected by the CLG 2012-based household projections is higher than the growth projected by the previous two series of household projections (the 'interim' 2011 and 2008-based series), but this is expected given the 2012-based SNPP projected higher population growth than the other two series.

⁵ CLG, CTB 2014 (Second Homes); CLG Live Table 125/615 (Vacant)

- 3.27 However, like the 2012-based SNPP, the 2012-based household projections are also underpinned by recessionary trends in relation to household formation, whereas the 2008-based projections are underpinned by trends gathered prior to the recession and are therefore higher in terms of projected household formation, particularly in younger age groups.
- 3.28 The CLG have published household formation data for the 2012-based household projections (household formations rates by age and gender). The rates show that household formation in the 2012-based projection still projects a declining household formation rate trend in the 25-34 and 35-44 age groups (see Figure 3.2 below) when compared with the interim 2011-based and 2008-based projections.
- 3.29 The interim 2011-based household projections were widely regarded to project forward very low household formation in younger age groups. This was due to the trends underpinning the projections covering the period just prior to and including the recessionary period, when housing became rapidly less affordable for people in the younger age groups due to a lack of supply.
- 3.30 Figure 3.2 illustrates that the 2012-based rates for Medway follow a similar trajectory to that of the interim 2011-based projections before them. After 2025 the 2012-based projection shows a declining trend which results in the gap between the 2008 and 2012-based rates increasing, and suppression in the 2012-based rate worsening.

Figure 3.2: Household Formation Rates, Medway



Source: CLG

- 3.31 The trend for declining household formation in the 25-44 age group is likely to be caused in part by worsening affordability. Planning for housing on the basis of a continuation of these suppressed household formation rates is not supported by PPG which recommends adjustments to households formation rates to reflect factors not captured in past trends (ID 2a-015).
- 3.32 Furthermore, planning on the basis of the 2012-based household formation rates is not considered to be in accordance with the principles of positive planning, and would likely place significant pressure on housing supply. Recent Planning Inspectorate decisions concur with this view.⁶
- 3.33 In this context, and given that the 2012-based projections show slightly lower household formation particularly for 25-44 year olds than the pre-recessionary 2008-based projections, it is considered that an adjustment needs to be made to comply with the National Planning Policy Framework's (NPPF) clear policy to 'boost significantly' the supply of housing, 'promote economic growth' and 'positively prepare' Local Plans.
- 3.34 How this adjustment should be applied has been subject of much debate, and there is not considered to be one correct answer, as it is a matter of judgement. However Barton Willmore would suggest a blended approach whereby the 2012-based HFRs are applied in all age groups, as published, with the exception of the 25-44 age group. In this age group it is considered that a gradual return to the projected 2008-based HFRs by the end of the Plan period is applied. This is considered to comply with the NPPF requirement to ensure that Local Plans are positively prepared, and a significant boost is made to housing supply.

iv) Housing Completions

- 3.35 A lack of housing completions can have a significant impact on the ability for people to move into an area to live, and for existing residents to have the opportunity to purchase their own property. A lack of housebuilding can lead to existing residents having to migrate out of the area. Table 3.6 sets out net completions for Medway over the past 10 years.

⁶ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

Table 3.6: Net Completions, Medway

Year	Net Completions	Plan Target	Surplus/Deficit
05/06	562	700	-138
06/07	591	815	-224
07/08	761	815	-54
08/09	914	815	+99
09/10	972	815	+157
10/11	657	815	-158
11/12	809	1,000	-191
12/13	565	1,000	-435
13/14	579	1,000	-421
14/15	483	1,000	-517
Total	6,893	8,775	-1,882

Source: Annual Monitoring Report

- 3.36 As Table 3.6 shows, since 2005/06 the number of completions has consistently fallen below Development Plan targets, with the exception of two years (08/09 and 09/10). This has resulted in a deficit of -1,882 dwellings over 10 years, representing 20% of planned supply.
- 3.37 Furthermore when compared against the official CLG household projections set out above in Table 3.6, the starting point estimate of need has been at least 1,260 per annum, which suggests under-delivery has been even worse than the comparison against Plan targets.
- 3.38 Notwithstanding this it is considered that this persistent under-delivery in Medway will have had a significant impact on the propensity of people to migrate into the area over the last 10 years. The net-migration trends can therefore be considered to have been constrained by a lack of delivery.

v) Summary

- 3.39 In summary, this section has considered the most up-to-date official population and household projections published by CLG and ONS. The key headlines from this section are as follows:
- The PPG emphasises that CLG household projections should only form the 'starting point' in an objective assessment of the overall housing need, and that sensitivity testing based on alternative demographic and household formation assumptions may be considered;

- This 'starting point estimate' is currently growth of 1,281 households per annum in Medway, using the latest 2012-based CLG household projections over the period 2012-2035 (Medway's plan period). Applying a household/dwelling adjustment (to account for vacancy and second home rates) the overall housing need is 1,323 dwellings per annum;
- However, Barton Willmore consider that growth of 1,323 dwellings per annum could represent an underestimate of demographic-led housing need for a number of reasons:
- The 2012-based household projections are based on household formation rate trends observed over the recessionary period, when affordability worsened significantly. There remains suppression in the household formation rates for 25-34 year olds in Medway. PPG states that adjustments may be required to the household projection estimate of need if rates have suppressed historically (paragraph 15). An adjustment in Medway is considered necessary in the 25-34 age group to address this suppression;
- Analysis of net housing completions has highlighted that annual completions have consistently fallen below the level of need required by consecutive Development Plans, and below official CLG household projections, inhibiting the propensity of people to migrate into Medway. This would have directly influenced the net migration trends underpinning the 2012-based ONS SNPP and the 2012-based CLG household projection;
- The 2012-based ONS SNPP are also considered a conservative projection in respect of the international migration assumption they are underpinned by (165,000 people per annum). This is less than half the most recent trend data from ONS shows (336,000 people per annum).
- Analysis of migration trends has concluded that the 2012-based SNPP provide a reasonable basis on which to assess demographic-led need in Medway at this point in time. However, for the reasons set out above the 2012-based SNPP should be considered a very minimum and if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase, then an updated short term migration should be considered.

3.40 This section identifies how the starting point estimate of OAN (1,323 dpa, 2011-2031) for Medway should be considered a very minimum.

3.41 The following section of this study considers the evaluation of official ONS and CLG data in the context of the Council's OAN evidence.

4.0 REVIEW AND CRITIQUE OF THE STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

A) INTRODUCTION

- 4.1 The Strategic Housing and Economic Needs Assessment (SHENA) dated November 2015 provides the evidence base to support the Council's determination of Objectively Assessed Need (OAN) for housing in Medway. The report has been prepared by Bilfinger GVA.
- 4.2 In the context of our assessment of demographic data in the previous section of this study, the following section provides an analysis and evaluation of the SHENA's approach to OAN in Medway. The analysis we present follows the methodological requirements of section ID2a – 'Housing and Economic Development Need Assessments' (HEDNA) to determine whether the Council's proposed housing target (1,281 dwellings per annum) represents full, unconstrained OAN.
- 4.3 It is important to note that the SHENA has assessed OAN over the period 2012-2037 which is the time period considered by the latest 2012-based projection series. However, the draft Local Plan covers the period 2012-2035.

B) NORTH KE NT STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

- 4.4 The 2015 SHENA seeks to establish the OAN for Medway following the methodology outlined in PPG. We would comment on the SHENA as follows:

i) Housing Market Area (HMA)

- 4.5 The SHENA begins with an assessment of the appropriate HMA in which to assess housing needs for Medway as required by PPG (ID 2a-010-20140306). The assessment's analysis draws on research published by CLG in 2010 titled 'Geography of Housing Market Areas'. In essence this research is based on work undertaken by the Centre for Urban & Regional Development Studies (CURDS) at Newcastle University.
- 4.6 The CURDS analysis is correctly presented by the SHENA as identifying Medway as falling within the London Strategic Housing Market Area which contains over 70 local authority areas. The SHENA considers this HMA definition is unmanageable and impractical (paragraph 2.9). Barton Willmore concurs with this conclusion.

- 4.7 For this reason, the SHENA also considers travel to work and migration patterns, and house price data and concludes that Medway has strong relationships with a number of neighbouring local authority areas. On this basis, the SHENA identifies a wider HMA which includes: Medway; Gravesham; Swale; Maidstone; and Tonbridge & Malling. The housing needs of the wider HMA are assessed in the SHENA
- 4.8 Barton Willmore consider the HMA definition applied in the SHENA to be inconsistent with the approach adopted in several of the authorities included within the definition. For example, Swale's housing needs were considered in isolation at the recent (November 2015) Local Plan Examination after the evidence base suggested Swale formed a HMA on its own. Similarly, Maidstone Borough are assessing their housing needs in isolation. Although Maidstone's SHMA identifies functional relationships between Maidstone and Medway, the Maidstone SHMA concludes that there is justification to distinguish Maidstone from Medway in market terms⁷. On this basis, the Maidstone SHMA considers Maidstone represents a HMA on its own.
- 4.9 On the basis of Maidstone Council and Swale Council both assessing their needs in isolation, Barton Willmore, for the purposes of this critique, consider Medway's needs in isolation.

ii) Starting point estimate

- 4.10 The SHENA gives detailed consideration to the latest 2012-based ONS Sub National Population Projections (SNPP) and CLG household projections as representing the 'starting point' estimate of need. Growth of 1,270 households per annum over the period 2012-2037 is correctly presented. However, it is important to note that over the period covered by the draft Local Plan (as presented in the current Issues and Options consultation as being 2012-2035) growth is 1,280 households per annum. The SHENA does not present this.

iii) Demographic adjustments

- 4.11 The PPG (paragraph ID2a-017) states how plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest ONS population estimates.

⁷ Paragraph 2.39, page 29, Maidstone Strategic Housing Market Assessment – Maidstone Borough Council, Final report, January 2014, GL Hearn

Adjustment to household formation rates

- 4.12 The SHENA does not undertake any sensitivity testing in relation to household formation.
- 4.13 The analysis presented in Chapter 3 of this report has shown clear suppression in household formation for those people aged 25-44 years, which Barton Willmore considers should be addressed through making an adjustment to the rates.
- 4.14 The danger of planning on this basis of the 2012-based household formation rates would be to exacerbate this suppression over a 23-year Plan period, adding to the trend of worsening affordability in Medway, and the inability of first time buyers to form their own households. This is not considered to comply with the NPPF requirement to positively prepare Development Plans.
- 4.15 Recent appeal decisions⁸ have agreed that there remains an element of suppression in the 2012-based household formation rates. A more positive approach to household formation in this age group would increase the starting point estimate above 1,270 households per annum (2012-2037)/ 1,280 households per annum (2012-2035).

Adjustment to the demographic projections

- 4.16 The SHENA presents three sensitivity scenarios with regards to the underlying population projections as an alternative to the published 2012-based ONS SNPP.
- 4.17 The **first** demographic sensitivity scenario included by GVA incorporates the 2013 and 2014 Mid-Year Population Estimates (MYPE), published by the ONS after the 2012-based SNPP were published. Despite the 2013 and 2014 MYPE projecting higher population growth than projected in the 2012-based SNPP, the effect of the SHENA incorporating the 2013 and 2014 MYPE into the 2012-based SNPP is to reduce household growth from 1,270 to 1,235 households per annum (2012-2037).
- 4.18 This seems counterintuitive (a point which the SHENA also raises at paragraph 5.38). However, the SHENA states that the reduction in household growth is due to the different age/ gender profile applied as a result of taking account of the 2013 and 2014 MYPE. This requires further investigation through bespoke modelling to establish whether this statement is correct.

⁸ Coalville and Cornwall

- 4.19 The **second** is a long-term (2005-2014) net-migration scenario which results in household growth of 1,148 households per annum – again lower than the ‘starting point’ estimate for 1,270 households per annum (2012-2037) as indicated by the 2012-based CLG household projections. This scenario projects household growth that is 10% lower than the starting point estimate.
- 4.20 Lower household growth is the result of lower projected population. The long-term trend (2005-2014) projects lower population growth because net migration is assumed to be lower (756 net migrants per annum) compared to the average net migration assumption of the 2012-based ONS SNPP (840 people per annum based on trends from the period 2007-2012).
- 4.21 At paragraph 5.39 the SHENA states that the later years of the inter-Census period (2001-2011), and the last three years since the 2011 Census (2012-2014) show the highest levels of population growth in Medway since 2001. The SHENA then goes on to state how the 2012-based CLG household projections are underpinned by trends drawn “principally from this period of high growth”⁹, and it is therefore appropriate to consider longer term trends from 2004-2014.
- 4.22 In this regard the latest Planning Advisory Service (PAS) guidance on OAN summarises the problems of using the 2007-2012 period as follows:

“The base period used in the latest official projections, 2007-12, is especially problematic. The period covers all of the last recession, in which migration was severely suppressed as many households were unable to move due to falling incomes and tight credit. Therefore the official projections may underestimate future migration - so that they show too little population growth for the more prosperous parts of the country, which have been recipients of net migration in the past. If so, by the same token the projections will also overestimate population growth for areas with a history of net out-migration.”¹⁰

- 4.23 Whilst Barton Willmore do not disagree with the consideration of longer term trends, the PPG supports adjustments to the ‘starting point’ estimate of need in relation to the underlying demographic projections and household formation rates. However, PPG states that any local changes would need to be clearly explained and justified on the basis of the established sources of robust evidence (ID 2a-017-20140306). In this instance, consideration of longer term trends does not seem appropriate for Medway as analysis of components of population change (see

⁹ Paragraph 5.39, page 93, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

¹⁰ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

Table 3.2 presented in Chapter 3 of this report and Figure 29 of the SHENA) clearly identifies net migration to Medway increasing since 2011. Therefore to consider a level of net in-migration lower than the 2012-based ONS SNPP in Medway is considered to wholly contradict the advice of the PAS Guidance.

- 4.24 GVA have chosen not to analyse a more recent 5-year trend, a decision Barton Willmore do not consider to be justified.
- 4.25 Analysis of migration trends, presented in Chapter 3 of this report, has illustrated that a more recent 5-year migration trend (2009/10 – 2013/14), which incorporates the last few years of recession, and the recent economic upturn, suggests net migration of 1,159 per annum. This is higher than the assumptions which underpins the 2012-based SNPP (840 migrants per annum) based on trends from the period 2007-2012.
- 4.26 However, there is not sufficient data at this point in time to say with any certainty whether Medway is experiencing a reversal of trend in terms of net migration. For this reason, despite a more recent 5-year trend showing higher net migration than the 2012-based SNPP, it is considered that the 2012-based SNPP provide the most reasonable demographic projection at this point in time. However, the 2012-based SNPP should provide the very minimum projection of population growth given the issues highlighted in Chapter 3 of this report. Furthermore, we reserve the right to amend this approach if subsequent releases of Mid-Year Population Estimates indicate that net migration to Medway is continuing to increase.
- 4.27 A **third** sensitivity scenario is the long-term net-migration scenario (2005-2014) including the 'unattributable population change' (UPC) recorded by ONS for Medway. The UPC is an element of population change which the ONS cannot account for. There is the possibility that it may be due to under recorded levels of international migration, but it could equally be due to other reasons.
- 4.28 The effect of including UPC within the long-term migration trend scenario is to reduce household growth to 1,124 households per annum (compared to growth of 1,148 households per annum excluding UPC) over the period 2012-2037.
- 4.29 Barton Willmore's approach is to exclude UPC from demographic modelling scenarios. This is based on the following:
- ONS' confirmation that UPC has been excluded from the calculation of the 2012-based ONS SNPP;

- Advice sent by email from ONS to Barton Willmore that it would be 'sensible' to exclude UPC from the calculation of net-migration trends;
- The ONS statement that if UPC was due to international migration, its effect would have been in the first half of the decade, after which the recording of international migration was improved;
- Local Plan Examination decisions where UPC has been excluded (Aylesbury Vale, Eastleigh, Arun). In the case of the most recent decision in Arun (February 2016), UPC was significant, yet the Inspector noted that if UPC were to be attributed to migration, errors would have been earlier in the 2001-2011 period;
- The ONS' statement that UPC is only applicable to the 2001-2011 period and does not introduce a bias that will continue in future projections.

4.30 The UPC scenario is therefore not considered to be a robust scenario for growth in Medway.

4.31 The SHENA presents demographic-led need in Medway to be between 1,124 and 1,270 households per annum over the period 2012-2037 based on the results of the two long-term migration trend scenarios. Once an allowance for vacancy has been applied this results in dwelling growth of between 1,167 and 1,317 dwellings per annum.

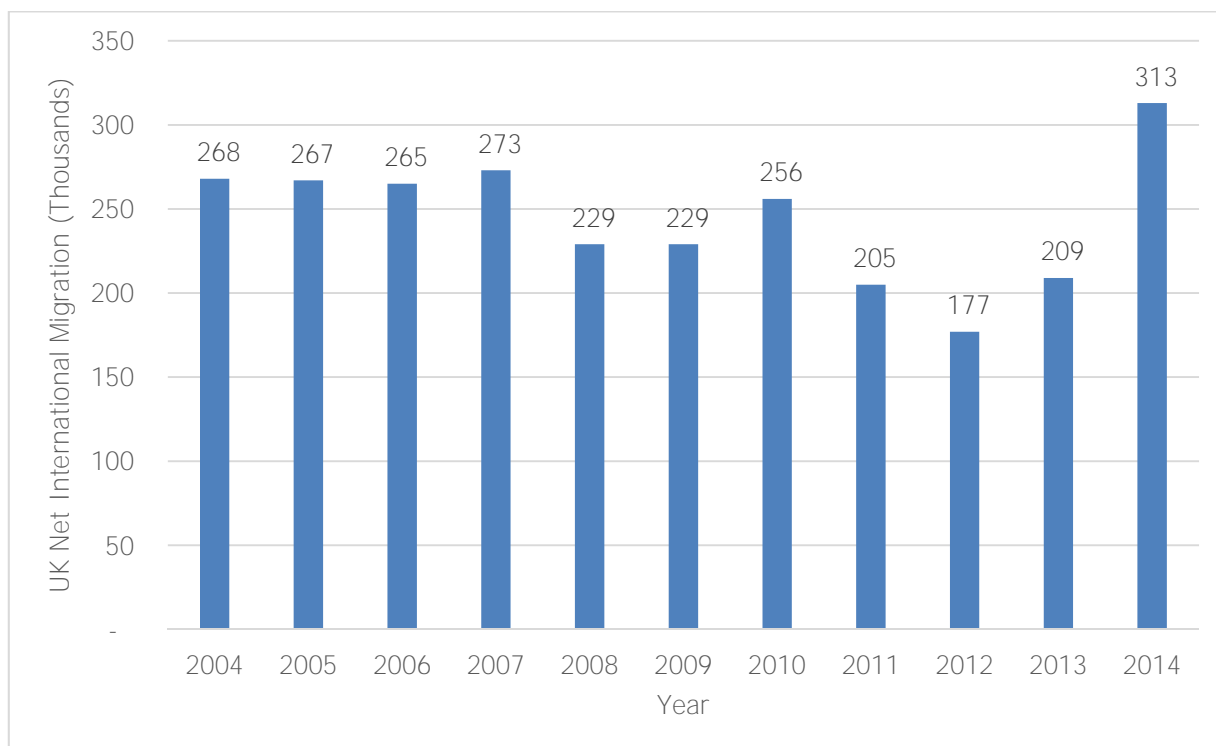
4.32 However, the SHENA acknowledges that due to the uncertainty of UPC, it is appropriate to consider an average of the two long-term migration scenarios (including and excluding UPC)¹¹. This results in growth of 1,136 households (1,179 dwellings) per annum over the period 2012-2037.

4.33 Barton Willmore consider that OAN of less than the 2012-based CLG household projection should not be considered, for the following reasons:

4.34 First, the 2012-based ONS SNPP were underpinned by net migration trends between 2007 and 2012, and as this analysis shows, they are underpinned by three years (2008-2011) when net in-migration fell significantly below two of the years prior to the 2007-2012 period. This contradicts GVA's statement that the later years of the 2001-2011 period show the highest levels of growth. This statement by GVA is not considered to be justified.

¹¹ Paragraph 5.47, Page 95, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

- 4.35 The **second point** concerns the assumption of net international migration in the 2012-based ONS National Projections, which underpin the 2012-based ONS SNPP. The 2012-based ONS national population projections are based on net international migration of 165,000 people per annum continuing every year up to 2037.
- 4.36 The assumption of net international migration in the ONS 2012-based national projections is considered by Barton Willmore to be a significant underestimate. This view is based on more recent evidence from ONS which shows how international net-migration was 336,000 people in the most recently recorded year (ending June 2015) – over double the 2012-based ONS national projection assumption. The 10-year average has also been circa 240,000 people per annum (see Figure 4.1 below).
- 4.37 On this basis alone, it is considered the 2012-based ONS SNPP, and therefore the 2012-based CLG household projections, are based on conservative assumptions and for this reason should be considered a minimum projection of future growth.
- 4.38 This is emphasised further by the more recent 2014-based national projections (29 October 2015) which have increased the assumption to 185,000 people per annum. The effect of this increase will be seen in the 2014-based SNPP, which are due for release in the first half of 2016.
- 4.39 A further effect on in-migration is the delivery of housing. Table 3.6 in this study has shown how delivery has fallen below planned targets in all but two of the past ten years. The cumulative effect has been for a deficit in delivery of 1,882 dwellings (20% lower than planned supply). This will have constrained in-migration to Medway, and trends would have been higher if planned housing targets had been met and the homes were there to be filled.

Figure 4.1: UK Net International Migration, 2004-2014

Source: Migration Statistics Quarterly Report, November 2015

4.40 Finally it is considered the past three years net in-migration to Medway (1,280, 1,293, and 1,793 people per annum respectively) highlight how the 2012-based SNPP and CLG projections are based on a conservative net in-migration assumption of only 840 people per annum.

4.41 However, given there is no degree of certainty as to whether Medway is experiencing a reversal of trend in relation to net migration, it is considered that the 2012-based SNPP at the very least should provide the minimum projection of future population growth. On this basis, for the Medway SHMA to favour the long-term migration trend approach (which projects lower population growth) is considered inappropriate.

4.42 In summary, it is not considered justified to project lower population or housing growth than the starting point estimate.

iv) Adjustments to support economic growth

4.43 The approach applied by GVA in the SHENA to economic-led OAN is generally considered robust, save for the assumptions in respect of job growth forecasts. GVA use a single source, Experian Economics, from quarter 1 of 2015. Experian is considered a robust source of job growth forecasts, however it is Barton Willmore's view that an average forecast should be taken from three sources; Experian Economics, Cambridge Econometrics, and Oxford Economics. This

view has been taken following criticism of the use of using a single source in some Local Plan examinations, given the fluctuation in forecasts, which are often published on a quarterly basis. This triangulated approach was supported by the South Worcestershire Local Plan Inspector¹².

- 4.44 In terms of unemployment assumptions, Barton Willmore's approach would be to assume a return to pre-recessionary rates of unemployment over the first ten years of the Plan period. This is a similar approach to the GVA method although they do differ slightly.
- 4.45 Economic activity rate assumptions must also be entered into demographic modelling software to generate the labour force growth required to fill jobs. GVA's approach is to use the Kent County Council 'Technical Paper Activity Rate Projections to 2036' paper (October 2011). This is the same source used by Barton Willmore, and is considered to be a robust independent method which provides unbiased assumptions of how economic activity will increase in older age groups over the next 25 years. However it should be noted that a more recent (November 2014) paper is available and this should be used in preference to the October 2011 edition.
- 4.46 The SHENA also undertakes a sensitivity test of economic activity which incorporates assumptions from Experian's Report 'Employment Activity and the Ageing Population' which has the effect of increasing economic activity of women in line with past trends from 1981, along with significantly increase economic activity for older people.
- 4.47 The commuting ratio is the final assumption which can have a significant effect on economic-led housing need. GVA's approach is to use the 2011 Census ratio of 1.28, and for this to remain static over the Plan period. This is considered a robust approach to apply.
- 4.48 The SHENA considered three economic scenarios but only presented the results of two – the Sector Based Growth scenario and the Sector Based & London Paramount Indirect Scenario. Housing need to support both economic scenarios increases above the baseline demographic needs (1,179 dwellings per annum as indicated by the mid-point of the two long-term migration trends) if KCC economic activity rates are applied; to support the Sector Based Growth scenario 1,197 dwellings per annum are required and to support the London Paramount Indirect scenario a total of 1,213 dwellings per annum are required.
- 4.49 If Experian's economic activity rates are applied, housing need to support both economic scenarios is below the baseline demographic need (1,020 dpa required to support Sector Growth scenario and 1,036 dpa to support the London Paramount scenario).

¹² Stage 1 of the Examination of the South Worcestershire Development Plan; Inspector's Further Interim Conclusions on the Outstanding Stage 1 Matters, 31 March 2014

- 4.50 It is important to note that the level of housing need identified from both economic scenarios and both economic sensitivity tests, is below the 'starting point' estimate of 1,270 households/ 1,317 dwellings per annum (2012-2037) as indicated by the CLG 2012-based household projections.

v) Market signals adjustment

- 4.51 The GVA report provides a summary of median **house price** increases in Medway between 2000 and 2013. The source used by GVA in obtaining this information (CLG) is considered robust. As GVA summarise, between 2000 and 2013, values in Medway increased by 128.6%; the second fastest rate observed out of seven authorities analysed. The rate also exceeded inflation in the south east region as a whole (96%).¹³
- 4.52 The SHENA's summary of rental prices shows a significant worsening in the lower quartile **rental prices** in Medway. Over the short period analysed (2010-2014), lower quartile rents increased by 10%; the second highest of the seven authorities analysed. This represents an increase of double that experienced in the south east region (4.3%), and triple the increase across England (3.3%). There is a clear affordability problem in respect of lower quartile rents in Medway when compared to surrounding areas.
- 4.53 The change in the **affordability ratio** is often the most crucial of market signals indicators, and the GVA report provides a summary of the lower quartile and median affordability ratios in Medway, compared to seven Kent authorities, the south east region, and nationally. The GVA report highlights how the lower quartile affordability ratio in Medway had increased by 65% between 2000 and 2013, and that this increase represents a more acute increase than the region (51%) and nationally (65%).¹⁴ This highlights how affordability has significantly worsened in Medway over the thirteen years analysed.
- 4.54 This study (section 3) identifies how household formation is suppressed in the 25-34 age group in the most recent 2012-based CLG household projections. The result of assuming the formation rates as published, and planning for growth based on them, will be a failure to address the significant increase in **concealed households** in Medway between the 2001 and 2011 Censuses. This increase across the country has been due to the significant worsening affordability of housing, leading to two or more adult households living with one another rather than forming their own households.

¹³ Paragraph 5.90, SHENA

¹⁴ Paragraph 5.97, SHENA

- 4.55 This trend is evidenced in Medway by the 68% increase in concealed households between the 2001 and 2011 Census'. This is broadly comparable to the regional and national averages (71%) although the SHENA states that concealment is not deemed to be worsening at a significant rate. However, the rate of increase in Medway is higher than in Canterbury (66%), Sevenoaks (56%), and Tonbridge and Malling (54%).
- 4.56 Furthermore the SHENA acknowledges a 13.03% increase in concealed households in the under 25 age group (13%). This is higher than the national average (12.76%) and several other Kent local authorities (Canterbury, Dartford, Maidstone, and Swale).¹⁵ Despite this, the SHENA concludes that the market signals information in respect of concealed families does not provide strong evidence of supply led pressures in Medway¹⁶. Barton Willmore disagree and a response in establishing the OAN for Medway is needed to alleviate this worsening trend.
- 4.57 The **rate of development** is also considered as a market signal, with the PPG stating how future supply should be increased to reflect the likely under-delivery of a Plan, if the rate of development has been lower than the planned number. A meaningful period must be assessed in line with PPG, and as this study has shown (Chapter 3), delivery in Medway has been 20% lower than the planned number over the past 10 years.
- 4.58 The GVA report also identifies this lack of delivery, but over the intercensal period (2001-2011) rather than the last 10 years considered in this study (2005-2014). Notwithstanding this difference, GVA identify growth in Medway's housing stock of 7.3%; lower than the sub-regional, regional, and national averages. Furthermore GVA identify how completions have exceeded planned targets in only three of the 12-year period between 2001/02 and 2012/13¹⁷.
- 4.59 In summary, it is important to note the PPG, which states the following in respect of market signals:

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings."¹⁸

"Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections."¹⁹ (Our emphasis)

¹⁵ Table 51, SHENA

¹⁶ Paragraph 5.108, SHENA

¹⁷ Paragraph 5.118, SHENA

¹⁸ ID2a-019, Housing and Economic Development Needs Assessments, PPG

¹⁹ ID2a-020, Housing and Economic Development Needs Assessments, PPG

- 4.60 In the context of the PPG, and the analysis set out by GVA, it is clear than an upward adjustment to the CLG household projection for Medway is required. Failure to do so will only serve to exacerbate the conditions which have led to the affordability problems experienced in Medway over the past 10 to 15 years.
- 4.61 The PPG does not quantify the market signals uplift, other than to say how “plan makers should set this adjustment at a level that is reasonable” and “on reasonable assumptions could be expected to improve affordability.”²⁰ Local Plan Examination decisions are the only source in which market signals adjustments have been quantified. At the Eastleigh Local Plan Examination, the Inspector recommended a 10% uplift to demographic-led projections in order to alleviate market pressure considered as “modest”. This level of uplift was considered “cautious” by the Inspector.²¹ The same level of uplift was also considered applicable by the Uttlesford Local Plan Inspector.
- 4.62 An equally cautious uplift of 10% to the 2012-based CLG household projection in Medway would result in an increase to at least **1,456 dwellings per annum**.
- 4.63 The SHENA considers the level of uplift the economic-led scenarios with KCC economic activity rates applied would make to the baseline demographic level of need (mid-point between the two long term migration trends). This is presented as between a 1.5% and 2.9% uplift which is not considered sufficient to respond to the local market signals.²² Barton Willmore agree.
- 4.64 As an alternative, the SHENA also considers the level of uplift the CLG 2012-based household projections, updated to take account of the 2013 and 2014 MYPE, provides to the mid-point of the two long-term migration trends. This is presented as being equivalent to an 8.6%, which the SHENA considers a significant uplift.²³
- 4.65 On this basis the **SHENA concludes on OAN for Medway of 1,281 dwellings per annum** (2012-2037) as indicated by the CLG 2012-based household projections updated to take account of the 2013 and 2014 MYPE.
- 4.66 Barton Willmore do not consider the market signals uplift applied in the SHENA to be sufficient. The SHENA’s ‘uplift’ is applied to the SHENA’s long-term migration trend which is already below the starting point estimate according to PPG. Therefore even applying the market signals ‘uplift’ results in OAN that is still below the starting point estimate (1,281 dpa compared to 1,323 dpa).

²⁰ ID2a-020, Housing and Economic Development Needs Assessments, PPG

²¹ Paragraphs 39-41, Eastleigh Borough Local Plan, Inspector’s Report, February 2015

²² Paragraph 5.129, SHENA

²³ Paragraph 5.130, SHENA

vi) Affordable housing need

4.67 As stated in the NPPF, LPAs are required to ensure their local plans meet OAN for both market and affordable housing. The Satnam v Warrington BC High Court Judgment provides useful guidance on the proper exercise that needs to be undertaken to assess affordable need as part of OAN. That is:

“(a) having identified OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes; (our emphasis)

(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPG, paragraphs 14 and 47.”²⁴

4.68 The ELM Park v Kings Lynn and West Norfolk BC High Court Judgment (July 2015) provides a more recent judgement on the role of affordable housing need within OAN, determining that affordable need did not have to be met in full when determining OAN but rather:

“This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA “addresses” these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area.”²⁵

4.69 It is therefore clear that where there is significant affordable housing need, although it is not required to be met in full, an increase should be considered.

4.70 In the context of this, the Council’s draft Plan states the following in respect of affordable housing need in Medway:

“The Strategic Housing Market Assessment (SHMA) carried out in 2015 for Medway identified a high level of demand for affordable housing, at 17,112 over the plan period. The Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial analysis indicates that a percentage of 25 % affordable housing would be deliverable on developments of over 15 units, taking into account land values and development costs.”²⁶ (our emphasis)

²⁴ Paragraph 43 (iv) (a) and (b), High Court Judgement CO/4055/2014, Satnam Millennium Limited v Warrington Borough Council, 19/02/2015

²⁵ Paragraph 33, page 11, High Court Judgement CO/914/2015, Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government, ELM Park Holdings Ltd, 09/07/2015

²⁶ Paragraph 7.12, page 21, Medway Council Issues and Options Consultation Document, January/February 2016

- 4.71 This is a significant level of affordable housing need, equating to 744 affordable dwellings per annum. To deliver this level of affordable housing in full, at provision of 25%, would require full OAN of circa 3,000 dwellings per annum, 2012-2035. It is accepted that 3,000 dwellings per annum is unrealistic, but a figure in excess of the Council's existing target would help to meet some of this affordable need.

vii) Summary

- 4.72 In summary, the SHENA identifies OAN for Medway as being 1,281 dwellings per annum over the period 2012-2037 based on the results of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates.
- 4.73 This level of housing need has been taken forward in the draft Local Plan to represent need over the period 2012-2035.
- 4.74 OAN of 1,281 dwellings per annum is not considered to represent full OAN for Medway over the plan period (2012-2035) for the following reasons:
- There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dwellings per annum, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The GVA SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
 - The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;

- The GVA SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The GVA SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The GVA SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 This review of the Strategic Housing and Economic Needs Assessment (SHENA) has considered the objectively assessed need (OAN) for housing over the period 2012-2037 which has been taken forward in the Medway Council Plan Issues and Options document which is planning for housing needs over the period 2012-2035. **Full OAN is presented in as being 1,281 dwellings per annum over the period 2012-2035.**
- 5.2 In short it is considered the OAN presented in the SHENA plans for very low levels of demographic growth over the Plan period, and does not represent a positively prepared OAN. From the outset, it is important to note how the level of OAN presented in the SHENA is below the PPG's starting point estimate of need – the latest CLG household projection (1,323 dpa, 2012-2035).
- 5.3 The SHENA's OAN conclusion is underpinned by applying 2012-based household formation rates to their preferred population projection (a revised 2012-based ONS SNPP scenario to reflect 2013 and 2014 ONS Mid-Year Population estimates). The 2012-based CLG household projection projects suppressed household formation for those aged 25-44 years of age; those most likely to represent concealed households and first time buyers. Barton Willmore consider it necessary to apply an adjustment to address this suppression and positively prepare the Local Plan, an exercise which has not been undertaken in the SHENA. This approach is supported by recent Planning Inspectorate decisions, which note continuing suppression in the 2012-based CLG projections.²⁷
- 5.4 Notwithstanding that the starting point estimate of OAN (1,323 dpa, 2012-2035) is higher than the Council's proposed level of provision, the starting point estimate should be considered a very minimum for a number of reasons.
- 5.5 The 2012-based CLG household projection is underpinned by the 2012-based Sub National Population Projections (SNPP) which assume very low net international migration to the UK (165,000 people per annum) compared with more recent trends (336,000 people in the last recorded year), an assumption which filters down to local authority level and has been identified by recent Local Plan Inspector's decisions²⁸. PAS Guidance also identifies how the net migration of the 2012-based ONS SNPP may well be an underestimate²⁹.

²⁷ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁸ Paragraph 1.12, page 3, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁹ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

- 5.6 Furthermore, analysis of migration trends has identified that the net migration assumptions of the 2012-based SNPP (840 net migrants per annum, 2012-2037) is low in the context of a more recent 5-year trend given that net migration to Medway has increased over recent years.
- 5.7 However, because it cannot be said with any certainty whether Medway is experiencing a reversal of trend in respect of migration, it is considered reasonable to use the 2012-based SNPP as the most appropriate demographic population projection at this point in time. However, if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase then it would be considered appropriate to change this approach.
- 5.8 With the above points in mind, it is considered that the 2012-based SNPP should provide the very minimum projection of population growth in Medway.
- 5.9 The approach to assessing an uplift for economic growth is considered to be broadly sound. However it is considered that the use of only one forecast is a weak approach. Given the fluctuation of job growth forecasts, Barton Willmore would recommend an average of the three leading forecasting houses; Experian Economics, Cambridge Econometrics, and Oxford Economics. This approach was endorsed by the South Worcestershire Local Plan Inspector.
- 5.10 The SHENA does not suggest a direct uplift to account for worsening market signals. The SHENA acknowledges that some market signals in Medway have worsened to a greater extent than neighbouring local authorities, the south east region, and the national average. The PPG states that an upward adjustment to the demographic starting point should be applied in the event that any of the market signals indicators show a worsening trend. The SHENA considers the level of uplift the economic scenarios provide to be insufficient, however, the 8.6% uplift provided by the CLG 2012-based household projections (adjusted to take account of the 2013 and 2014 MYPE) is considered by the SHENA to provide a significant uplift.
- 5.11 Barton Willmore do not agree. The level of uplift considered by the SHENA is considered in the context of a baseline demographic level of need that is already 10% below the starting point estimate (1,136 compared to 1,270 households per annum) over the period 2012-2037. In effect, the uplift considered by the SHENA still falls below the starting point estimate of need as indicated by the CLG 2012-based household projections, and which Barton Willmore consider to provide a conservative projection of future housing need.
- 5.12 The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local

Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

Way Forward

- 5.13 The PPG states how the OAN should be an unconstrained assessment. The SHENA's approach to OAN is not considered to comply with the PPG in this regard, and sets an OAN below the PPG's starting point estimate. Adjustments for household formation suppression, more recent migration trends, worsening market signals, and affordable housing need indicate a requirement for OAN significantly higher than the starting point estimate of OAN, 1,323 dwellings per annum (2012-2035). The OAN suggested by the SHENA is considered to be wholly inappropriate and not positively prepared, as required by paragraph 182 of the NPPF.

Appendix C

Objectively Assessed Housing Need: Dashboard (Barton Willmore, February 2016)

Objectively Assessed Housing Need

Medway Unitary Authority

February 2016 (updated)



Introduction

Planning Practice Guidance (PPG) on Housing and Economic Development Needs Assessments (26 March 2015) outlines the methodology for assessing housing need in the housing market area. The assessment should be an objective and unconstrained assessment based on facts and unbiased evidence.

This report summarises objectively assessed housing need for [Medway Unitary Authority](#). Although there are links with Greater London, it is considered pragmatic to consider Medway Borough as a District-wide HMA.

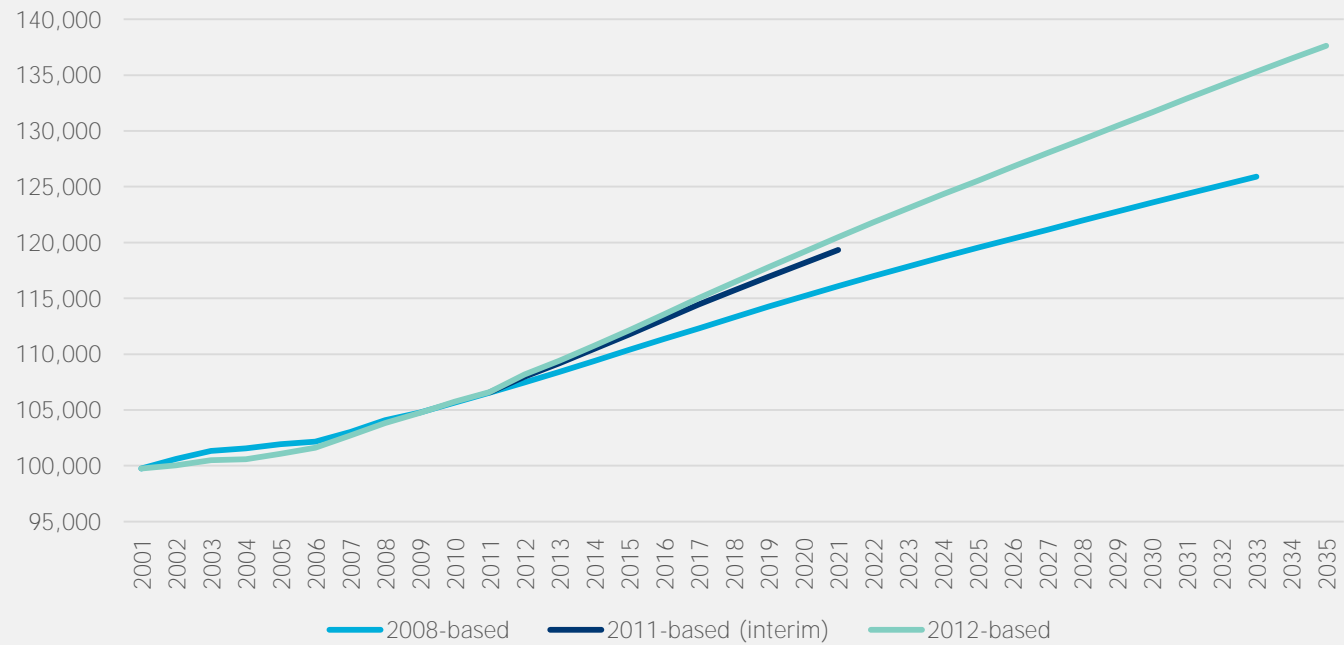
OAN Methodology

Following PPG, Barton Willmore's approach to assessing housing need is as follows.

1. Identify the [starting point estimate](#) of need and apply [demographic adjustments](#) to address household suppression and/ or to test alternative migration trends
2. Assess the labour force capacity of the demographic assessment and, if necessary, apply an uplift to support [job growth](#) in line with current forecasts and/ or past trends
3. Analyse [market signals](#) identified by PPG as; land prices, house prices, private rents, affordability, rate of development and overcrowding. A worsening trend in any of these indicators will require an upward adjustment to planned housing numbers
4. Establish whether the modelled housing need would meet [affordable housing need](#) or whether any further adjustment is necessary

This report provides a streamlined summary of these key issues. Further detail on modelling assumptions can be found in the accompanying Barton Willmore OAN Methodology statement.

CLG Household Projections: Medway

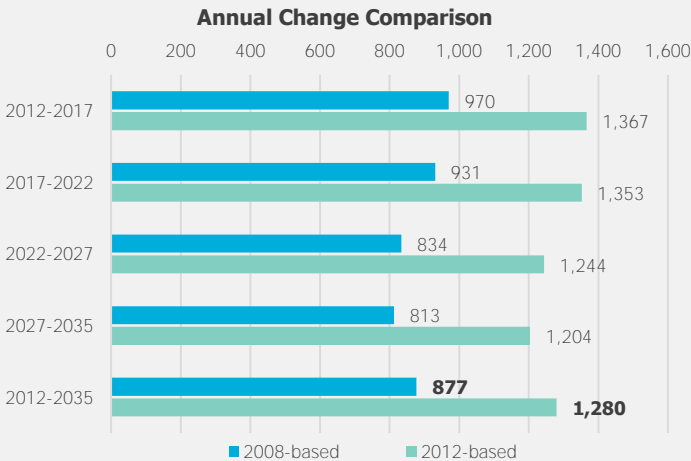


Household projections published by the Department for Communities and Local Government (CLG) should provide the starting point estimate of overall housing need.

The most recent series are the 2012-based household projections published on 27 February 2015. These project growth of **1,280 households per annum** in Medway over the period 2012-2035. Once an allowance for vacancy and second homes has been applied (3.3%) this equates to growth of **1,324 dwellings per annum**.

The 2012-based CLG projection projects a significantly higher level of household growth than the previous full projection (2008-based series) despite the falling levels of household formation projected in the 25-44 age group (see household formation opposite).

This suggests that household growth in Medway is largely being driven by higher population growth experienced in the area in recent years.

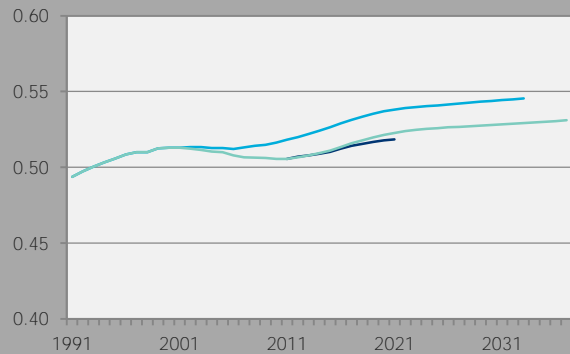


Source: Communities and Local Government (CLG) Household Projections

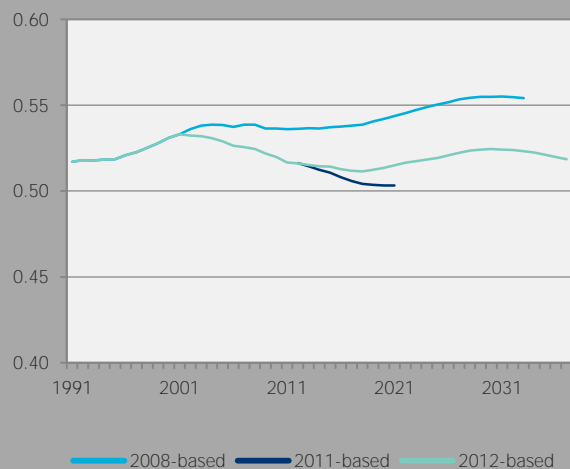
Suppressed Household Formation

The likelihood that a person of a certain age and gender to 'head' a household (household formation rate) is lower in some age groups in the 2012-based household projections compared to previous series. This suggests that the 2012 rates suppress household formation, particularly for younger people aged 25-34 and 35-44 years, in Medway. These are the groups who found it the most difficult to enter the housing market during and after the recession. An adjustment to the 2012 household formation rates in the 25-44 age group is required to address this issue.

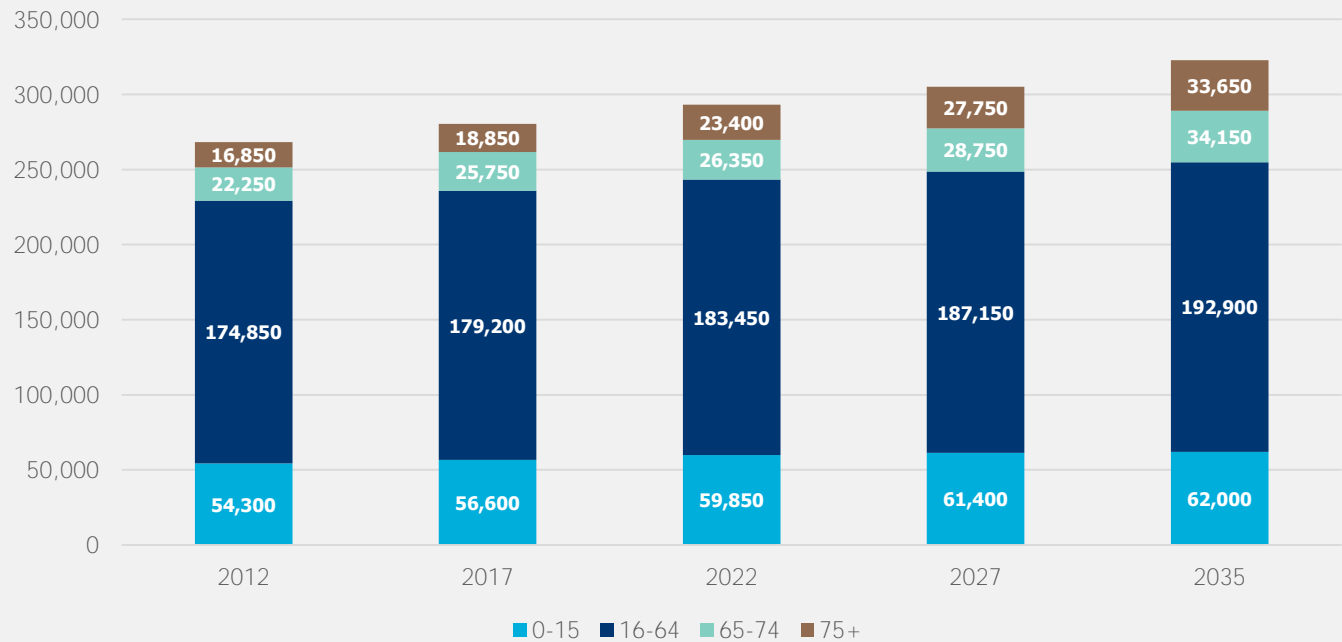
Household Formation Rates: All Ages (15+)



Household Formation Rates: Aged 25-44



ONS 2012-based Population Projections: Medway

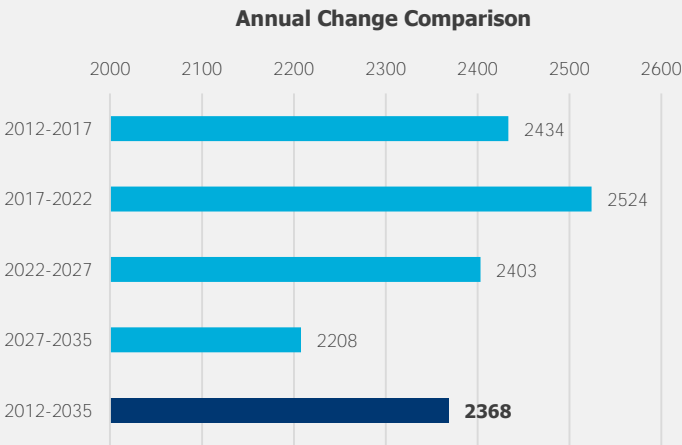


The 2012-based Sub National Population Projections (SNPP) project Medway's population to increase by an **additional 2,368 people per annum** over the period 2012-2035.

This is broadly comparable to the previous interim 2011-based ONS SNPP (circa 2,500 people per annum, 2011-2021), but significantly higher than the pre-recessionary 2008-based series (circa 1,370 people per annum).

At a national level the 2012-based ONS SNPP are considered a conservative projection, being underpinned by 165,000 net international migrants per annum projected between 2012 and 2037. This compares with over double this assumption (336,000 people per annum) being recorded in the most recent year (ending June 2015).

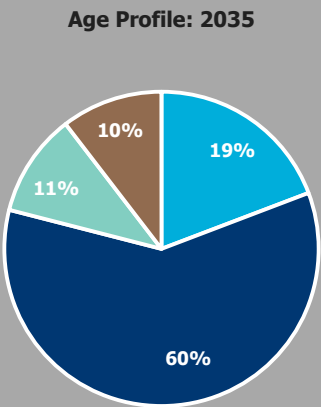
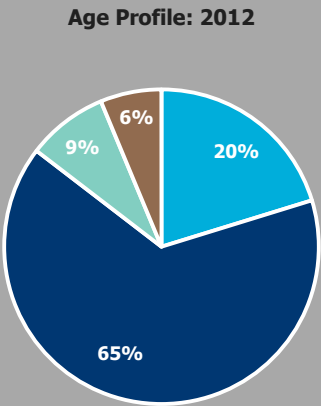
For this reason, flexibility for higher population growth in Medway than projected by the 2012-based ONS SNPP and the 2012-based CLG household projection is required, to ensure a significant underestimate is not assumed. If net-migration trends justify an upward adjustment to the 2012-based ONS SNPP, the PPG makes provision for this (see next slide).



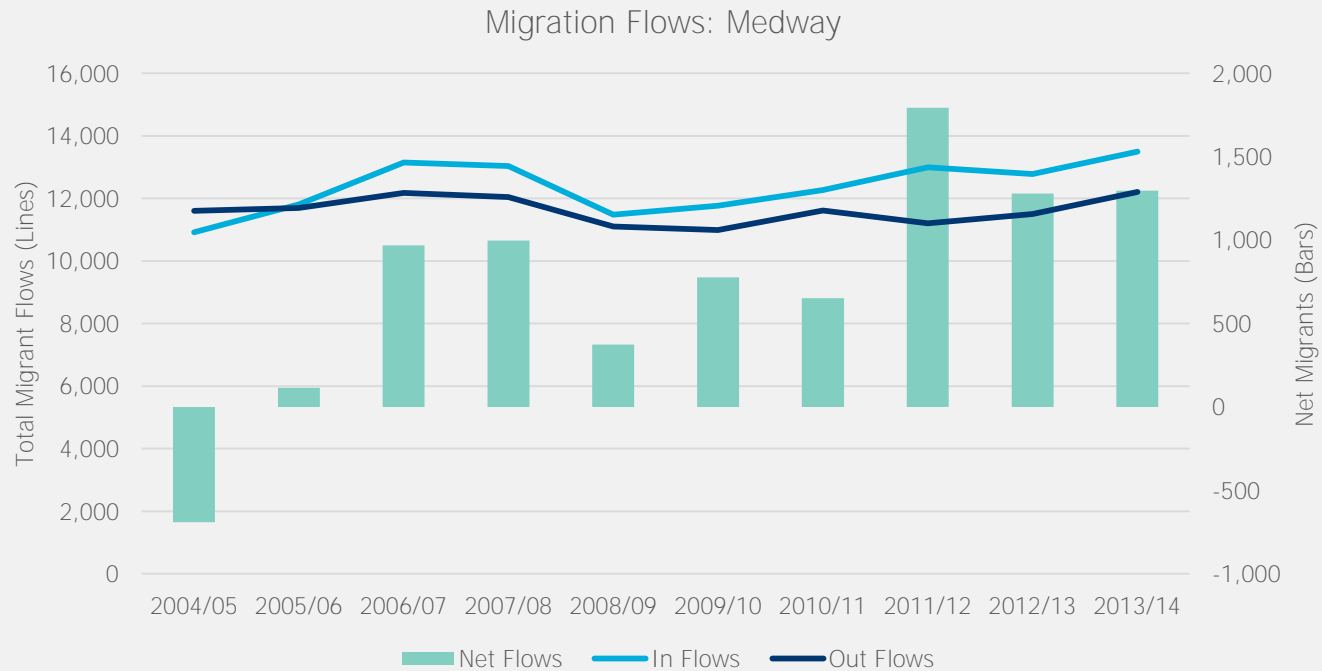
Source: Office for National Statistics (ONS) Sub National Population Projections

The Ageing Population

Over the Plan Period, the age profile of Medway is projected to change significantly. By 2035, the over 65 population will have increased by 6%. Left unchecked, the relative decline of prime working age (16-64) population will have an adverse effect on future economic competitiveness and productivity.



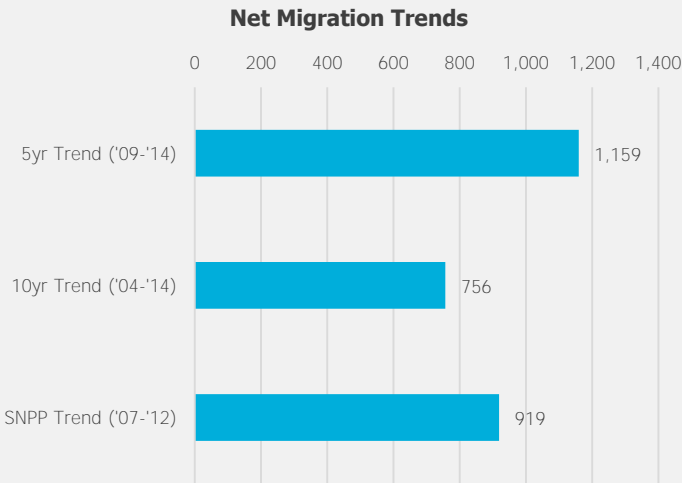
0-15 16-64 65-74 75+



Over the past decade there have been higher in flows than out flows of people moving to Medway, resulting in significant net in-migration to the Borough. Net in-migration fell sharply between 2008/09 and 2010/11 following the onset of the recession, but since 2011/12 has increased to between 1,280 and 1,793 people per annum.

Notwithstanding the most recent 5-year (2009-2014) trend incorporating the end of the recessionary period, the average has been for net in-migration of 1,159 people per annum. This exceeds the 10-year trend (756 people per annum) and the trend over the period 2007-2012 (919 people per annum) which underpins the 2012-based SNPP.

Despite net migration increasing significantly in the last three years, it cannot be certain whether this increase will continue. On this basis, it is considered that the 2012-based SNPP provide a reasonable demographic projection for Medway at this point in time but that the projection should be considered a very minimum and that if subsequent data releases show net migration to Medway continually increasing then the demographic assessment should be adjusted to reflect this.

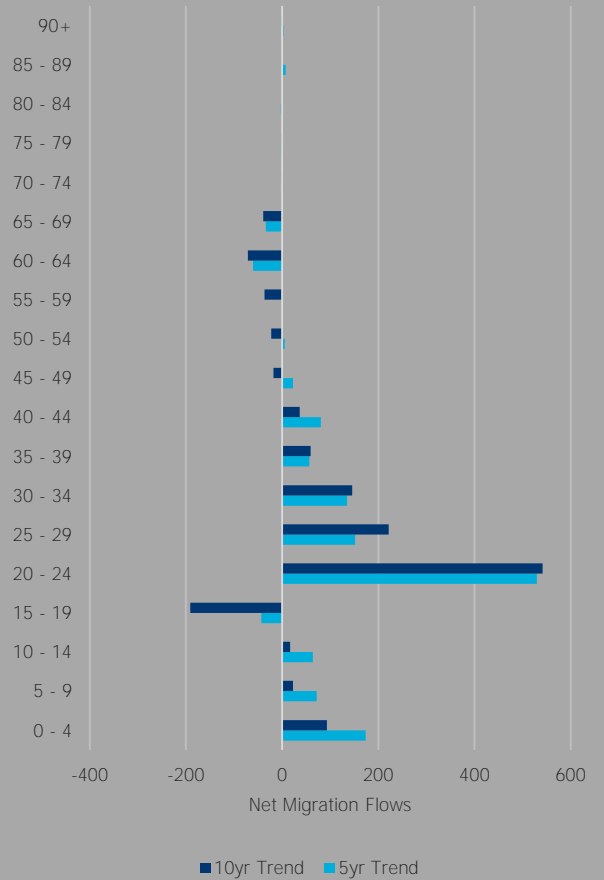


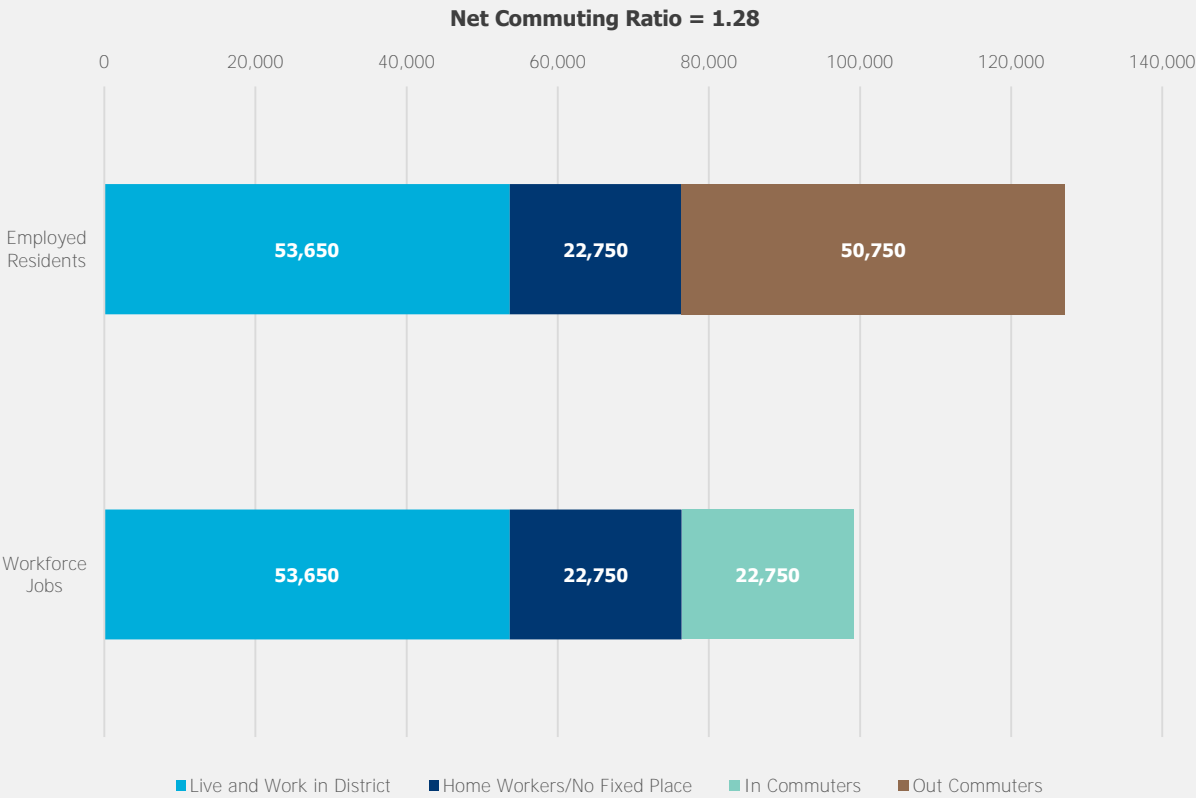
Source: Office for National Statistics (ONS) Components of Population Change

Age Profile of Migrants

Net migrants to Medway tend to be younger families who are of working age. Encouraging net migration will therefore counter the naturally ageing population of Medway. Without net migration the working age population of Medway will fall significantly over the plan period. To support economic growth in Medway the resident labour supply needs to increase to support past trends and forecasts of job growth.

Net Migration by Age Group





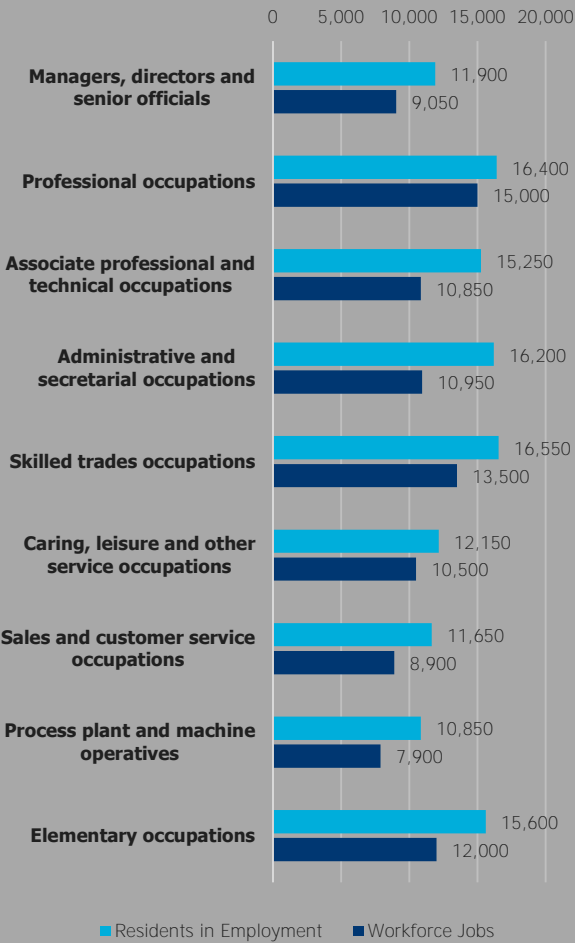
Within Medway there is a greater number of residents in employment compared to the number of jobs which means that Medway **exports labour**. This results in a commuting ratio of 1.28.

The commuting ratio is of importance in determining the number of people required to move into an area to generate labour force and fill jobs. The commuting ratio may change over the Medway Plan period (2012-2035), and this could require more or less workers. However for the purposes of demographic modelling and objectively assessing need, the commuting ratio is maintained at 2011 Census levels to ensure the objective assessment of need is unconstrained and 'policy off'.

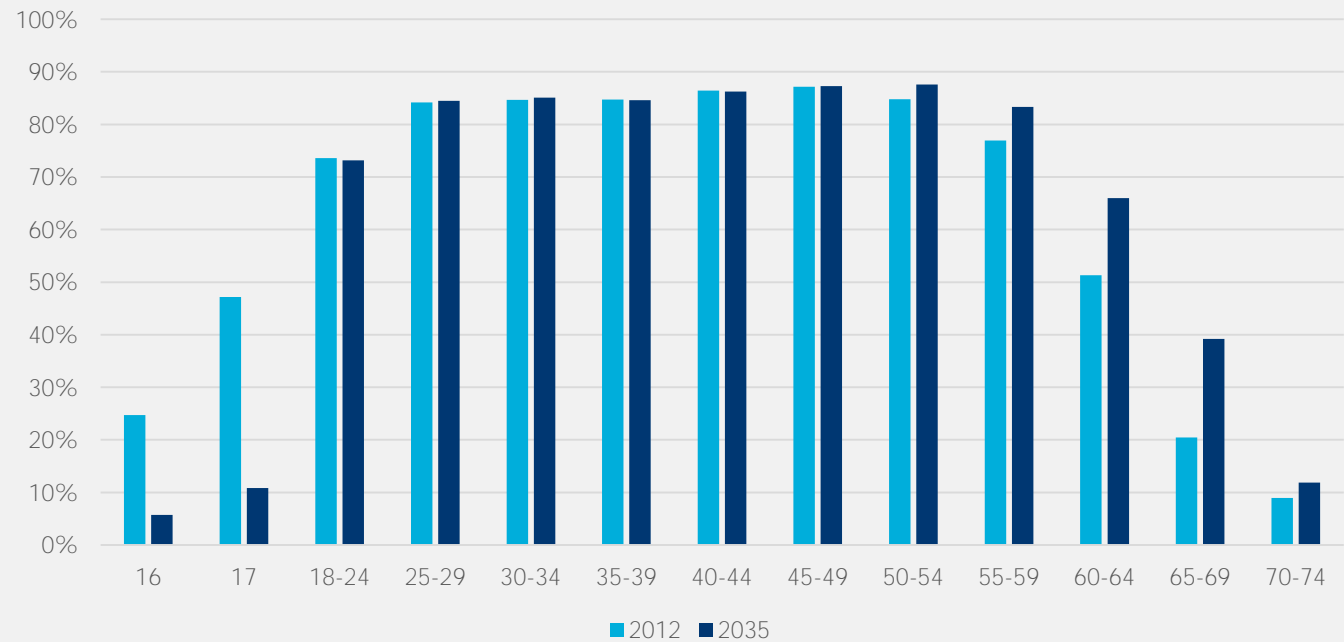
In the case of Medway, for every 100 jobs created, 128 economically active (labour force) people will be required.

Commuter Flows by Occupation

The data in this table shows how there is a net outflow of residents in employment in all occupations in Medway Borough. Professional and skilled occupations employ the largest numbers of people, both within the Borough and outside. Manual occupations employ the lowest numbers.



Economic Activity Rate Projections: Medway



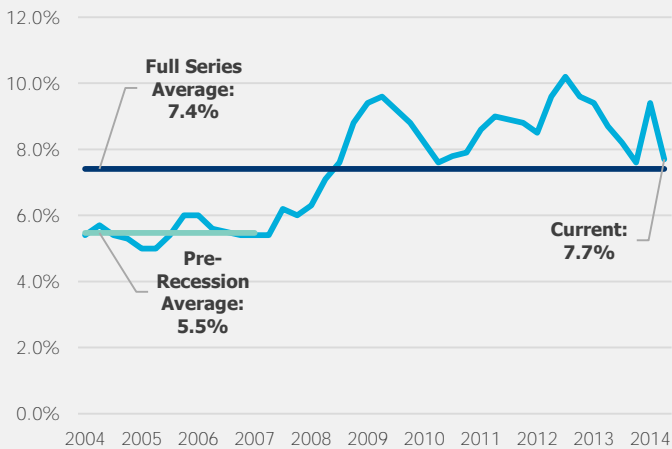
Economic activity rates measure, for a given age and gender band, the proportion of the population who are likely to be available for work.

The extension of State Pension Age (SPA) and the effective abolition of age-related retirement will increase the activity rates among the older age bands. In contrast, the extension of compulsory education to the age of 18 will reduce the activity rates of 16 and 17 year olds.

Activity rates are applied to the population projection to calculate the economically active population (resident labour supply) and therefore even where rates are held constant, an increase in the population will result in an increase in the resident labour supply. The graph above illustrates how the economic activity will increase over the Plan period.

Unemployment rates increased in Medway during the recession. In late 2009 the **unemployment rate peaked at 9.6%**. Barton Willmore's assessment assumes that unemployment will return to the **pre-recession average of 5.5%** by 2021 and remain constant thereafter.

Medway Unemployment Rates - APS

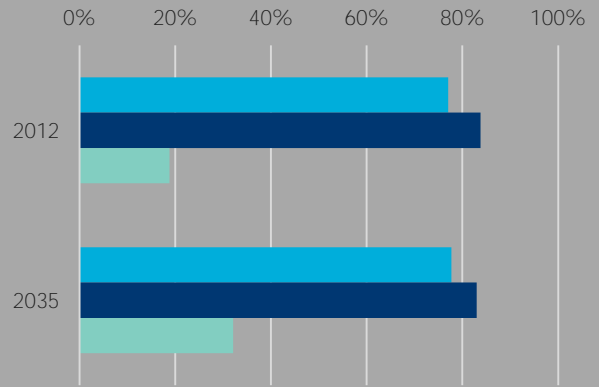


Source: ONS, 2011 Census Economic Activity projected using Kent County Council Activity Rate Forecasts to 2036, November 2014
ONS, Annual Population Survey Model Based Estimates of Unemployment

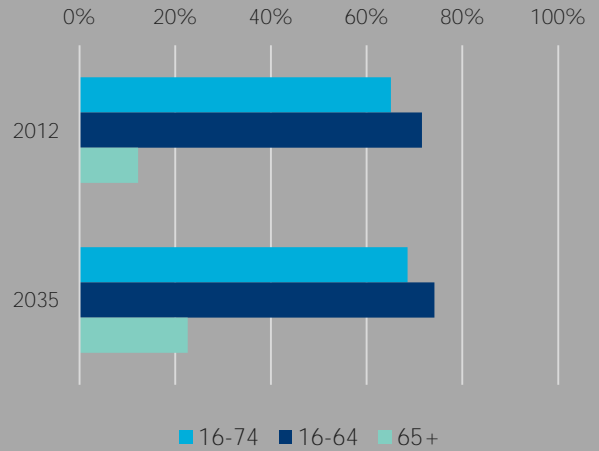
Male and Female Economic Activity

Economic activity rates are generally higher for males than females. However, between 2001 and 2011, female activity rates increased more rapidly than males as a result of increased participation of females in the labour market. Projections assume this pattern will continue. However, female rates are still expected to remain lower than males. The extension and equalisation of male and female SPA will increase future economic activity rates for both males and females aged 65+.

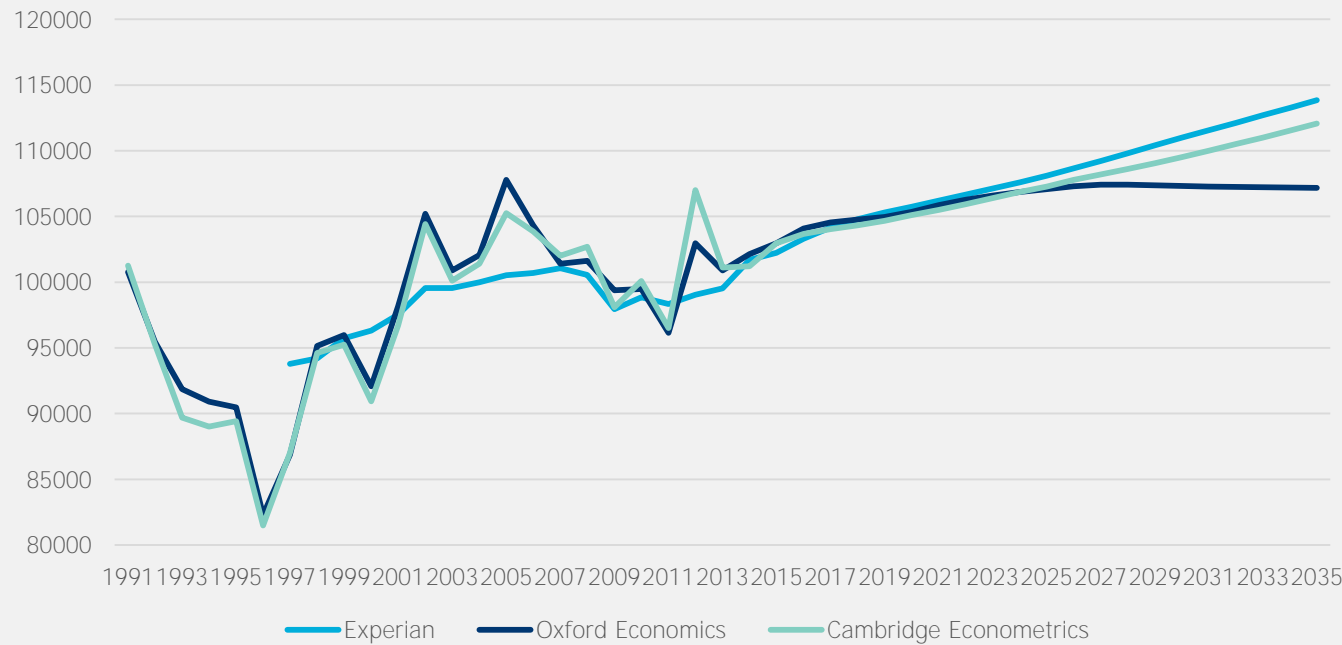
Male activity rate projections



Female activity rate projections



Workforce Job Growth: Medway



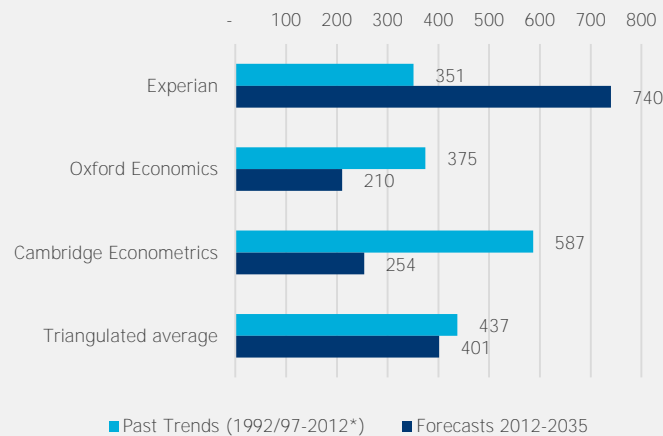
The PPG (paragraph ID2a-018) states how employment forecasts and trends must be taken into account when establishing unconstrained OAN.

In this context Barton Willmore has obtained the most recent job growth forecasts from the leading three forecasting houses (Experian Economics, Cambridge Econometrics, and Oxford Economics). The three sources provide past trends alongside the forecasts for the period being assessed here (2012-2035).

The average forecast job growth for the Plan period is 401 jobs per annum. This follows a broadly similar trajectory to the average past trends recorded by the three forecasting houses (437 jobs per annum, 1992/97-2012).

The demographic forecasting undertaken in this assessment therefore establishes the level of housing growth required to support job growth of 401 jobs per annum in Medway.

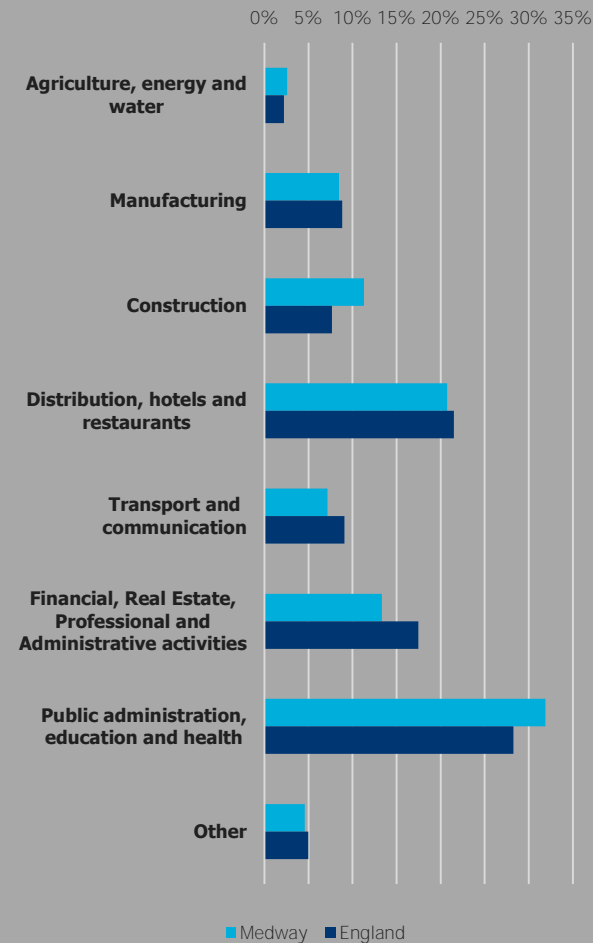
Annual Workforce Job Growth



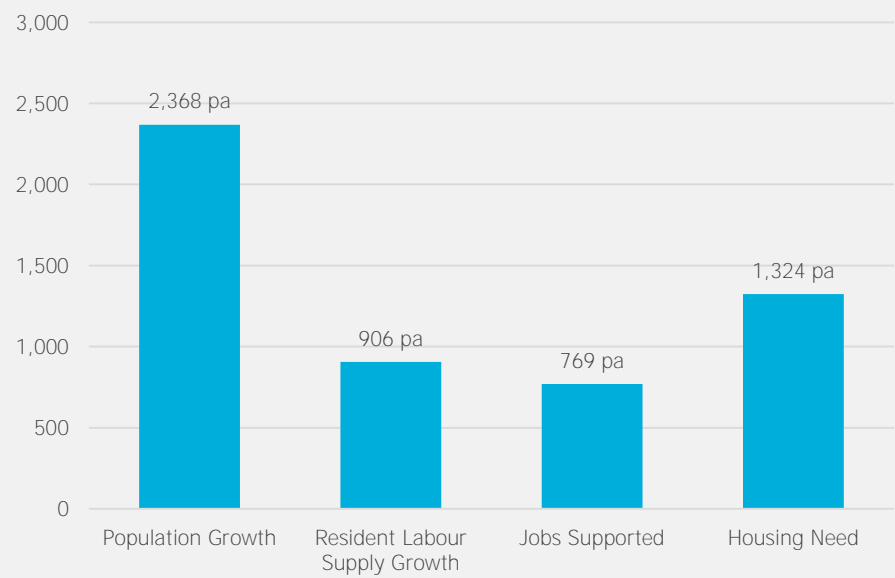
Source: Experian Economics, Oxford Economics, Cambridge Econometrics

Key Industrial Sectors

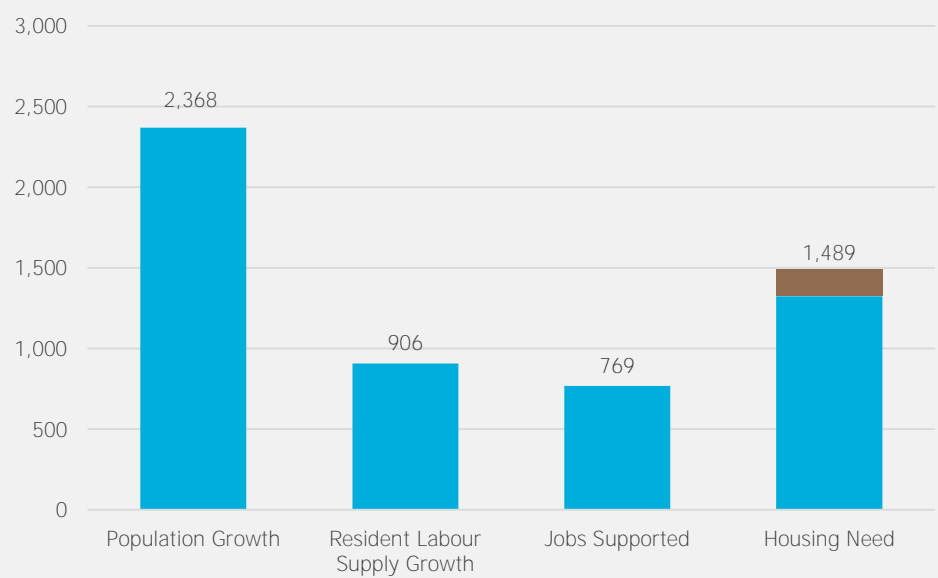
Medway's employment base is diverse with people who work in Medway working in a wide range of industries. The industrial sector which employs the most people is the Public administration, education and health sector (32%) followed by Distribution, hotels, and restaurants (21%). These two sectors account for over 50%.



Starting Point



Household Formation Adjustment



■ Starting Point ■ HFR adjustment

The PPG’s ‘Starting Point’ scenario is a reflection of the CLG 2012-based Household Projection series, with adjustments made to convert household change into housing need (by applying adjustments for vacant and second homes). In Medway this adjustment rate is 3.3% and the unadjusted dwelling requirement would be **1,324 dpa, 2012-2035**.

This starting point would provide for the policy off average job growth forecast (401 jobs per annum) we set out on page 8.

However this is the **starting point estimate only**. To comply with the requirements of PPG, consideration of the underlying household formation rates and migration assumptions underpinning this starting point need to be considered. Adjustment should then be made if local circumstances dictate.

The starting point estimate of need (1,324 dpa) is considered to be underpinned by suppression in household formation in the 25-44 age group in Medway. PPG ID2a-015 states how sensitivity testing can be undertaken, specific to local circumstances, and in this context an adjustment to the starting point has been made. This complies with the NPPF requirement to ensure Plans are positively prepared.

The above graph shows how a blended approach to household formation rates would alter the OAN starting point. This blended approach is as follows; all ages with the exception of the 25-44 age group are underpinned by the household formation rates of the starting point. However in the 25-44 age group we have applied a return to the pre-recessionary 2008-based household formation rates by the end of the Plan period (2035). This will help to alleviate the clear suppression in household formation in this age group.

This adjustment results in an **increase to 1,489 dpa, 2012-2035**. This is considered to represent full OAN for Medway.

The PPG states how an adjustment to the demographic projection can also be considered. Barton Willmore’s analysis of migration trends has identified that net migration to Medway has increased in the last three years. However, we cannot be certain whether this is a reversal of trend. Until more sufficient data is available, it is considered appropriate to plan on the basis on the 2012-based SNPP. Nonetheless it is considered that the 2012-based SNPP should provide the **very minimum** level of future population growth in Medway given the low international migration assumptions they are underpinned by. However, if subsequent releases of Mid-Year Population Estimates provide evidence that migration to Medway is continuing to increase, then the approach to OAN may require modification.

The affordability ratio measures the ratio between lower quartile house prices and lower quartile earnings. The chart to the right tracks the affordability ratio in Medway between 1999 and 2013 based on a three year rolling average.

Although Medway is lower than the average for the south east region, in 2013 lower quartile house prices remained 6.6 times lower quartile earnings. House prices are therefore unaffordable for most first time buyers.

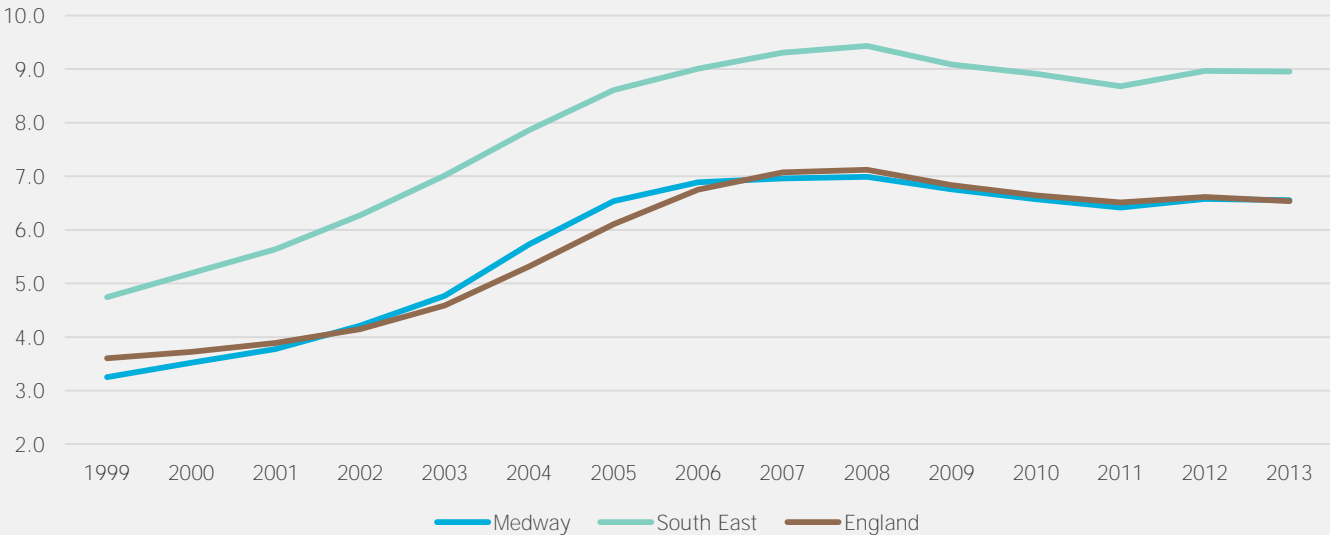
Private housing market entry thresholds indicate that 68% of first time buyers in Medway would not be able to afford a lower quartile house and 59% would not be able to afford lower quartile rents in the Borough.

Affordability is just one of the six market signals that PPG identifies needs consideration when determining housing need, with a worsening trend in any of the indicators providing justification for an adjustment to the housing need number suggested by the household projections.

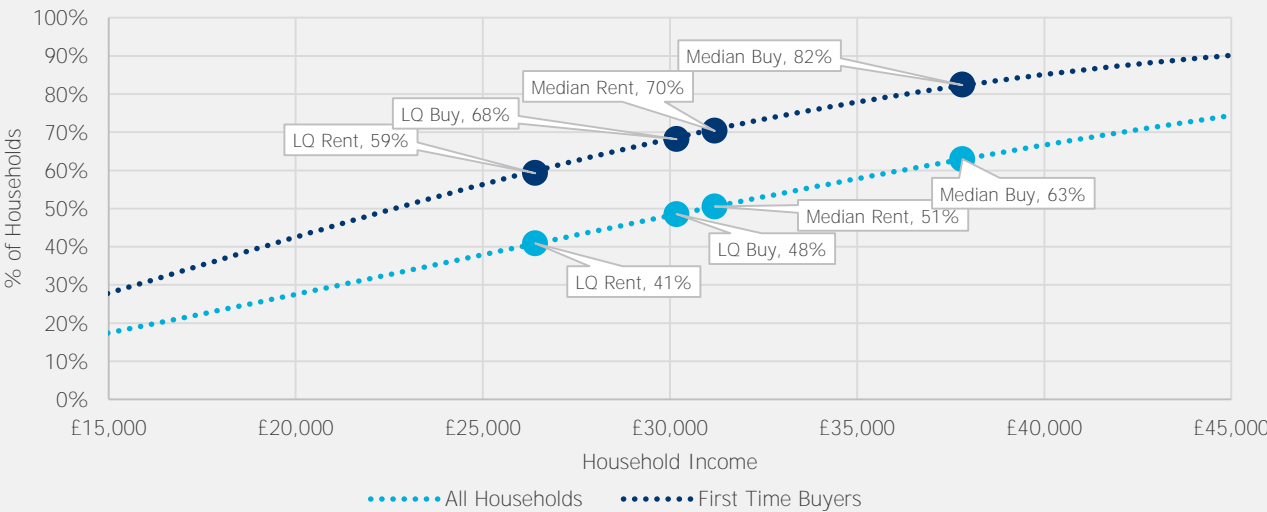
Further consideration of all of the market signals is deemed necessary in order to establish the full extent to which there are market signals issues within Medway, but this evidence suggests an acute affordability problem in Medway.

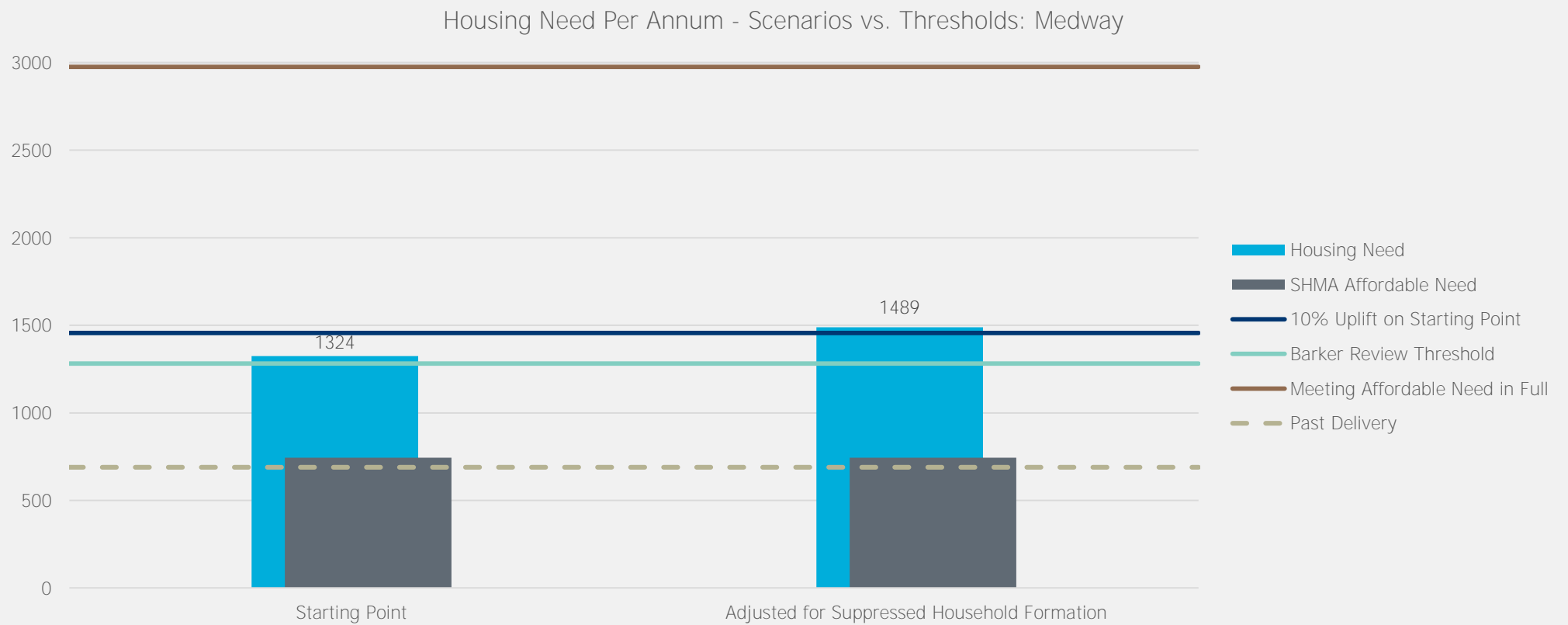
The OAN we propose would help to alleviate worsening affordability in Medway.

Lower Quartile Affordability Ratio: Medway



Private Housing Market Entry Thresholds: Medway





The 'starting point estimate' of housing need in Medway as indicated by the CLG 2012-based household projections is **1,324 dwellings per annum** over the period 2012-2035. If a 10% uplift is applied to the 'starting point' estimate (in line with the 'modest' uplift applied by Inspectors in recent Examinations, for example Eastleigh) to address worsening market signals, then this would bring housing need up to approximately **1,456 dwellings per annum**.

However, the 'starting point estimate' is considered an **underestimate** of future housing need, as it projects suppressed household formation rates in the 25-44 age group over the 23-year Plan period. An adjustment to more positive 2008-based rates of household formation solely in the 25-44 age group shows how the starting point estimate would need to be increased to **1,489 dwellings per annum** to ensure the suppression in the 25-44 age group is alleviated. Planning on the basis of more positive rates of household formation would help to improve affordability for first time buyers and reduce the number of concealed households (such as adult couples living with parents) in this age group.

The 'starting point' adjusted for suppressed household formation would generate the level of economically active population required to meet the average 'policy off' job growth forecast (401 jobs per annum). An upward adjustment for job growth is not considered to be required. However the draft Medway Plan identifies affordable housing need equating to 744 affordable dwellings per annum. The Council's policy is to deliver 25% affordable housing on all major developments. To achieve this, OAN would need to increase to nearly 3,000 dwellings per annum, 2012-2035.

The 2012-based Household Projections indicate a starting point of 1,324 dwellings per annum, including a vacant dwelling adjustment of 3.3%.

The 25-44 age group shows clear signs of suppressed household formation in Medway. A return to pre-recessionary 2008-based household formation rates in this age group by 2035 would increase the starting point estimate to 1,489 dpa, 2012-2035.

Despite net migration to Medway increasing in recent years it is uncertain whether this trend will continue. On this basis, it is considered that the 2012-based SNPP provide an appropriate demographic projection for assessing housing need. However, the level of population growth projected by the 2012-based SNPP should be considered a minimum.

The demographic-led adjustments will result in growth of the economically active (labour force) population that will support the average 'policy-off' job growth forecast (400 jobs per annum). No further adjustment for jobs growth is considered necessary.

The latest evidence from Medway shows affordable housing need of 774 dpa. To meet this in full at provision of 25%, OAN of nearly 3,000 dpa would be required. This is not considered realistic, however we recommend the OAN of 1,489 dpa, which will go some way to meeting some of the significant affordable need.

Full OAN for Medway is considered to be 1,489 dpa, 2012-2035

METHODOLOGY STATEMENT
FOR OBJECTIVELY ASSESSING HOUSING NEED IN
MEDWAY UNITARY AUTHORITY

Project Ref:	20894/A5/DU
Status:	Final
Issue/ Rev:	02
Date:	02/16
Prepared by:	DU
Checked by:	DU
Authorised by:	EW

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1.0 INTRODUCTION

- 1.1 This paper has been produced to accompany the Objectively Assessed Housing Needs (OAN) dashboard for Medway Unitary Authority (MUA). It is intended to provide a more detailed description of the methodology used for assessing OAN.
- 1.2 Chapter 2 of the paper begins with a detailed outline of the national planning policy and guidance on establishing OAN, setting out the methodological approach taken by Barton Willmore.
- 1.3 An overview of the POPGROUP demographic forecasting model is presented in Chapter 3. This is the forecasting tool which has been used by Barton Willmore to undertake sensitivity testing of alternative demographic and household formation assumptions, along with an assessment of the level of housing required to support economic growth.
- 1.4 The data assumptions used within Barton Willmore's assessment of OAN along with their respective sources are presented in Chapter 4.

2.0 OVERVIEW OF OAN METHODOLOGY

- 2.1 The requirement for all Local Planning Authorities (LPAs) to base their housing targets on objective assessments of need is rooted in national planning policy – specifically the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

National Planning Policy Framework (NPPF, 27 March 2012)

- 2.2 NPPF sets out the Government's planning policies for England and how these are expected to be applied. NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).
- 2.3 In respect of delivering a wide choice of high quality homes, NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).
- 2.4 With regard to plan-making, local planning authorities are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156).
- 2.5 Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of and strategies for housing and employment uses, taking full account of relevant market and economic signals (paragraph 158).
- 2.6 For plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should prepare a Strategic Housing Market Assessment (SHMA) that identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period (paragraph 159).

Planning Practice Guidance (PPG, 06 March 2014)

- 2.7 PPG was issued as a web based resource on 6th March 2014, following the publication of 'beta' guidance in 2013. Guidance on the assessment of housing development needs (PPG ID2a) includes the SHMA requirement set out in NPPF and supersedes all previous published SHMA practice guidance (CLG, 2007).

- 2.8 The primary objective of the housing development needs assessment (the SHMA) is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002).
- 2.9 Housing need refers to the scale of housing likely to be needed in the housing market area over the plan period, should cater for the housing demand in the area and identify the scale of housing supply necessary to meet that demand (PPG ID2a 003).
- 2.10 The assessment of need is an objective assessment based on facts and unbiased evidence and constraints should not be applied (PPG ID2a 004).
- 2.11 Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

PPG methodology for assessing housing need

- 2.12 The full methodology is set out at ID 2a 014 to 029 (overall housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

i) Starting point estimate of need

- 2.13 The methodology states that the starting point for assessing overall housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends (ID2a 015).

“The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing.” (2a-015) (Our emphasis)

ii) Adjusting for demographic evidence

- 2.14 The PPG methodology advises that adjustments to household projection-based estimates of overall housing need should be made on the basis established sources of robust evidence, such as ONS estimates (2a-017).

iii) Adjusting for likely change in job numbers

- 2.15 In addition to taking into account demographic evidence the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems."
(2a-018)

iv) Adjusting for market signals

- 2.16 The final part of the methodology regarding overall housing need is concerned with market signals and their implications for housing supply (2a-019:020).

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." (2a-019)

- 2.17 Assessment of market signals is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards. Particular attention is given to the issue of affordability (2a-020).

"The more significant the affordability constraints ... and the stronger other indicators of high demand ... the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be." (2a-020)

v) Overall housing need

- 2.18 An objective assessment of overall housing need can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.
- 2.19 The extent of any adjustment should be based on the extent to which it passes each test. That is,
- It will at least equal the housing need number implied by the latest demographic evidence,
 - It will at least accommodate projected job demand; and,
 - On reasonable assumptions, it could be expected to improve affordability.
- 2.20 The approach used by Barton Willmore to objectively assess overall housing need follows the methodology set out in PPG 2a-014:20 and summarised above. The result is a policy off assessment of housing need that takes no account of the impact of planned interventions, strategies and policies.

vi) Affordable housing need assessment

- 2.21 The methodology for assessing affordable housing need is set out at 2a-022 to 029 and is largely unchanged from the methodology it supersedes (SHMA 2007). In summary, total affordable need is estimated by subtracting total available stock from total gross need. Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

"The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments ... An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." (2a-029) (our emphasis)

Barton Willmore Methodological Approach

- 2.22 Barton Willmore's approach to OAN closely follows the approach set out in PPG, and is therefore methodologically robust.

Stage One – Define the Housing Market Area Boundary

- 2.23 Before any assessment can be carried out, the limits of the HMA must be defined. This is vital to ensure that the OAN reflects the social and economic dynamics of the area, and informs discussions on distribution should a particular LPA within the HMA face insurmountable challenges in accommodating its own demand for housing.
- 2.24 As a starting point, research from the Centre for Urban and Regional Development Studies (CURDS) at Newcastle University is consulted, and compared against ONS Travel to Work Areas (most recently produced in 2007 from 2001 Census data – update due in 2015) and HMA definitions applied within recent LPA evidence base studies. These definitions are then tested using commuting and migration flow data (plus data on house prices) to determine which is most appropriate for the purpose of assessing housing need, taking account of guidance set out at PPG ID: 2a-009 to 013. The HMA area as defined and used by the LPAs has also been considered within this assessment.

Stage Two – Identify and Adjust Demographic Starting Point

- 2.25 The CLG 2012-based Household Projections (released in February 2015) act as the starting point for assessing housing need (as established at PPG ID: 2a-015). However, these projections alone do not constitute OAN – several adjustments are required based on further evidence.
- 2.26 The first adjustment made is to account for suppressed household formation inherent in the 2012-based household formation rates. The problem of suppression arises because although formation rate projections are based on a long run trend which takes its bearings from Census points since 1961/71, that trend is distorted by the results of the 2011 Census, taken at a time when formation was greatly constrained by economic factors (supply, affordability and the aftermath of recession). An adjustment therefore needs to be made to the household formation rate assumptions, relative to local circumstances. To do this, a return to the household formation rates assumed in the last pre-recession household projections series can be incorporated into the forecasting model, for specific age groups and by gender, as appropriate.

- 2.27 A further adjustment can also be made to test alternative assumptions of net migration. Again, the recession has had a distorting effect on the movement of people between places, so longer term trends can provide a more robust guide of likely migration patterns in the future. However the short-term trend (past 5 years) can be justified.

Stage Three – Assess Labour Force Capacity

- 2.28 To identify the extent to which forecast labour demand will be accommodated by the OAN following the approach described above, a comparison is made between the size of the workforce arising from the adjusted demographic-led modelling, and job creation forecasts, taking into account 'policy-off' average job growth trends forecasts from three sources; Experian Economics, Cambridge Econometrics, and Oxford Economics; and potential changes in unemployment and economic activity rates over the plan period. The ratio of residents in employment and workforce jobs (the commuting ratio) is also an important input into this process.
- 2.29 If the size of the resulting workforce is less than the forecast number of jobs, it is likely that a further uplift in the dwelling target would be required. Should this occur, additional jobs-led modelling is carried out to identify the population growth (and therefore number of dwellings) required to supply sufficient labour capacity.

Stage Four - Assess Market Signals

- 2.30 Housing costs in all parts of the country are less affordable now than 20 years ago, largely due to a significant decline in the number of homes being built. The extent to which this breakdown between the supply of and demand for housing occurs within the subject HMA is observed through an analysis of Market Signals.
- 2.31 Several key Market Signals are assessed including House Prices, Private Rents, Affordability, Concealed and Overcrowded Households and Completion Rates. As stipulated at PPG ID: 2a-020, a worsening trend in any of these indicators requires a boost to the planned level of housing supply.

Stage Five – Bringing the Evidence Together

- 2.32 Overall housing need is identified by distilling the analyses discussed above into a single OAN for the period 2012-2035. This figure, by definition, does not take into account policy considerations which may place constraints on supply or limit the deliverability of housing. Housing need figures are provided for the relevant individual LPAs, but distribution of the

overall HMA OAN will in practice be subject to agreements between LPAs being made, including any constraints in particular areas.

Stage Six – Affordable Housing Need

- 2.33 The extent to which the OAN arrived at through the previous stages would meet affordable need is also assessed. Where the local authority SHMA has provided a recent and detailed account of affordable need which draws on primary research, this is used as the basis for much of the analysis. Where an LPA has not undertaken an affordable housing need assessment, an indication of what the requirement would be to meet the LPAs affordable policy is provided.

Chapter Summary

- 2.34 The approach of national policy and guidance clearly states the importance of objectivity and transparency in the assessment of housing requirements. This study has been prepared in accordance with this approach, and uses data and methodologies (where possible) which can be traced and replicated. The ultimate output of this study is a clear, unambiguous recommendation for housing development which is supported by a robust evidence base and sound assumptions.

3.0 POPGROUP AND DEMOGRAPHIC FORECASTING MODEL

3.1 The POPGROUP and Derived Forecast (DF) model is a well-established demographic model developed to forecast population, households and the labour force for specified geographical areas. POPGROUP has over 90 users, including academic and public service staff in housing, planning, health, policy, research, economic development and social services. It is the industry standard in the UK for demographic analysis within strategic planning. More information about POPGROUP can be found at <http://www.ccsr.ac.uk/popgroup/index.html>

3.2 The main POPGROUP model uses standard demographic methods of cohort component modelling that enables the development of population forecasts based on births, deaths and migration inputs and assumptions. In summary, this methodology adopts the following approach:

- take a base population by single year of age and gender;
- add births and 'in' migration (by age and gender) for year 1;
- subtract deaths and 'out' migration (by age and gender) for year 1;
- age the entire population by one year;
- results for year 1 can be noted;
- repeat the process above for each subsequent year of the forecast

3.3 The POPGROUP model can be used in conjunction with the DF model to produce household and labour force projections and subsequently to use housing and jobs as additional assumptions and constraints in further population projections.

3.4 Importantly the POPGROUP Model provides:

- independent projections that do not rely on other commercial forecasts;
- the ability to replicate Central Government population and household projections;
- the ability to run alternative 'what if' scenarios;
- flexibility to change data assumptions;
- a systematic, rigorous and transparent method so that results are easily traced back to assumptions;
- considerable disaggregation (e.g. annual forecasts, by single year of age and household types by age of 'head of household' for example)

- 3.5 In order to assess OAN, firstly the Central Government 2012-based population and household projections are re-produced within the POPGROUP model. This enables the starting point estimate of need to be determined according to PPG.
- 3.6 The POPGROUP model is then used to undertake a series of sensitivity tests by changing a number of input assumptions. The model assumptions that can be changed by the user are:
- starting population (by age and gender);
 - fertility rates (by age);
 - mortality rates (by age and gender);
 - household assumptions (vacancy rates, proportion second homes);
 - household representative rates (proportion of population, by age, gender and marital status, that are head of household);
 - in-migration profile (by age and gender and whether a migrant originates from elsewhere within the UK or from overseas);
 - out-migration profile (by age and gender and whether a migrant emigrates to elsewhere within the UK or overseas);
 - phasing of dwellings.
- 3.7 The first sensitivity test that is undertaken is to test the impact of alternative household formation rates in comparison to the rates used by CLG to produce the most recent 2012-based household projections. Household formation rates indicate the likelihood of a person to form a notional head of household. Household formation rates (by age and gender) are applied to the generated population forecast in order to indicate the future number of households and by analysing change over time can be used to indicate a future housing need requirement once an adjustment has been applied to take account of vacancy and second homes. This sensitivity test models the impact of applying a gradual full return to the 2008-based household formation rates for 25-34 year olds by 2035.
- 3.8 The second sensitivity test modelled within POPGROUP is to apply alternative migration trends in comparison to those used to produce the 2012-based Sub National Population Projections (SNPP). The 2012-based SNPP draw trends from the five-year period 2007-2012; a period reflecting deep economic recession which in some places resulted in atypical migration patterns.
- 3.9 The 2012-based ONS SNPP for Medway assumes net in-migration to Medway of 840 people per annum, 2012-2035. This is based on trends drawn from the period 2007-2012. Analysis of net migration over this period indicates net migration of 941 people per annum over this period

which is lower than average net migration of 1,159 people per annum drawn from a more recent 5-year period (2009-2014). Despite net migration to Medway increasing in recent years, it is uncertain whether this trend will continue. For this reason Barton Willmore consider the 2012-based SNPP to provide a reasonable demographic projection for Medway at this point in time. However, our approach may be adjusted in light of new evidence (for example, if the release of subsequent Mid-Year Population Estimates illustrates net migration to Medway continuing to increase).

- 3.10 In light of this, no alternative migration trends are presented for Medway. However, if they were, our approach to modelling alternative migration trends is outlined below.
- 3.9 There are two different ways to approach the consideration of alternative migration trends:
- The counts approach is based on the average net migrant count per year, by age and gender, for each migration flow (in and out) over a given period;
 - The rates approach is based on the average migrant count per year divided by the reference population, by age and gender for each migration flow over a given period. The reference population is taken to be UK population minus district population for in flows and district population for out flows.
- 3.10 Each approach will lead to slightly different results. For example, a 5-year trend of counts will result in a different population projection to one based on a 5-year trend of rates, yet both are reflective of a short-term (5-year) trend. No approach is right or wrong. However, a counts approach uses a fixed number of total migrants in each year of the projection period. In reality, this is unlikely to happen and migration counts will fluctuate. A rates based approach applies the past trend of age and gender specific migration rates to the changing demographic profile and as a result the number of migrants in each year of the projection period will be different.
- 3.11 Our preference is to use the rates based approach as in addition to reflecting past trends, it responds to the changing demographic profile, providing in our opinion, a more robust assessment. Furthermore this is the approach used by ONS to produce the Sub National Population Projections.
- 3.12 Model outputs from the sensitivity tests provide an indication of the resident labour supply that would be generated from the given scenario and by applying assumptions regarding unemployment and economic activity this can be used to determine the number of jobs that could be supported. This enables a conclusion to be reached as to whether the demographic-led assessment of need would support job growth in line with past trends and economic

forecasts. If it is determined that the demographic-led assessment of need would not support economic growth in line with past trends and economic forecasts, the POPGROUP model is then used to determine what level of housing would be required to support such economic growth.

- 3.13 The POPGROUP model is used to produce a population forecast constrained to an annual job growth target as indicated by past trends and/ or economic forecasts. In a job-led forecast the POPGROUP model calculates the required population and dwelling growth needed to support the future job target. In this type of forecast the model forecasts the population through the cohort component methodology but increases (or decreases) the population accordingly to meet the set job target by altering migration levels.
- 3.14 The POPGROUP model contains data specifically relating to the local authority under consideration in order to reflect the socio-demographic profile of the study area. The data assumptions and sources used to produce the Medway Unitary Authority forecasts are presented in the next section.

Name: Emma Wreathall

Reference

86

Organisation

Barton Willmore

On Behalf Of

Taylor Wimpey south East

Type of Consultee

Developer/Consultant

MEDWAY COUNCIL LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2012 – 2035

RESPONSE TO PUBLIC CONSULTATION

ON BEHALF OF

TAYLOR WIMPEY STRATEGIC LAND

February 2016

**MEDWAY COUNCIL LOCAL PLAN
ISSUES AND OPTIONS CONSULTATION 2012 – 2035**

RESPONSE TO PUBLIC CONSULTATION

**ON BEHALF OF
TAYLOR WIMPEY STRATEGIC LAND**

FEBRUARY 2016

Project Reference:	25962/A5
Status:	FINAL
Issue/Revision:	02
Date:	29 February 2016
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APPENDICES

Appendix A:	Site Location Plan (P01 Rev A)
Appendix B:	Objective Assessment of Housing Need: Critical Review (Barton Willmore, February 2016)
Appendix C:	Objective Assessed Housing Need: Dashboard (Barton Willmore, February 2016)

1.0 INTRODUCTION

i) Purpose of these Representations

- 1.1 These representations have been prepared on behalf of Taylor Wimpey Strategic Land and set out comments in response to Medway Council's (MC) Local Plan Issues and Options Consultation (LPIO, January/February 2016). Taylor Wimpey Strategic Land has land interest in a site known as 'Land at Mierscourt Road, Rainham' (hereafter referred to as 'the Site') (**Appendix A:** Site Location Plan).
- 1.2 The Site was put forward for consideration to MC's 'Call for Sites' Strategic Land Availability Assessment (SLAA) in May 2014 as part of the larger development of a Site known as 'Siloam Farm, Rainham' (SLAA Ref: 0847).
- 1.3 Further detail on the Site is contained in Section 12.0 of these representations.
- 1.4 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework (NPPF) (March 2012), National Planning Practice Guidance (PPG) (March 2014) and the Consultation on Proposed Changes to National Planning Policy (December 2015).

ii) Purpose of the LPIO

- 1.5 The LPIO document advises that the current consultation is in advance of the preparation of a new Local Plan, and therefore is not a formal Regulation stage under the Town and Country Planning (Local Planning) Regulations 2012 ('the Local Planning Regulations'). The Local Development Scheme 2015-2018 (November 2015) anticipates that a "Preferred Options" consultation will be undertaken in January to February 2017, forming the first formal stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations).
- 1.6 The LPIO (January/February 2016) sets out the key contextual matters for the Local Plan, for which the increasing population in Medway is considered to be most central. In total there are 22no. matters in the LPIO document, and a number of questions posed.

- 1.7 In addition, the LPIO considers a number of potential approaches that could be taken to form a development strategy for a new Local Plan, based on identified development principles (LPIO, para 27.8). The potential approaches include:
- High density town centre and riverside development;
 - Incremental suburban development;
 - Planning growth of existing settlements;
 - Freestanding settlements;
 - Urban extensions;
 - Role of custom and self-build housing; and
 - Chatham Town Centre.
- 1.8 Whilst the consultation is welcomed, it should be recognised that the LPIO does not contain any detailed policies or identify specific development sites (excluding reference to the unknown outcome of Lodge Hill) that can be assessed, and therefore due to the “broad” nature of the questions posed, the benefit of the consultation responses to MC will be limited in this regard.
- 1.9 The LPIO consultation has not been accompanied by a suite of Evidence base documents that should inform the production of a new Local Plan. Indeed, the Strategic Housing and Economic Needs Assessment (SHENA), the only Evidence Base document due for publication alongside the LPIO consultation (in January 2016), was not made publicly available until 19 February 2016, i.e. 6-weeks from the start of the consultation period, and 1 week from its close. This is disappointing.

iii) Content of Representations

- 1.10 The LPIO, and the strategy for the preparation of a new Local Plan, has been assessed on the basis of National policies as set out in Section 2.0. These representations are structured as follows and provide a response to the following matters/questions:
- Section 2.0 – National Policy
 - Section 3.0 – Housing/Questions 4, 5 & 6
 - Section 4.0 – Environment/Questions 30 & 32
 - Section 5.0 – Built Environment/Questions 33, 36 & 41
 - Section 6.0 – Open Space/Question 52
 - Section 7.0 – Sports Facilities/Question 54
 - Section 8.0 – Agricultural Land/Question 56
 - Section 9.0 – Transport/Question 72

- Section 10.0 – Deliverability/Question 77
- Section 11.0 – Development Strategy/Question 82

1.11 In summary, these representations set out the following comments:

- The North Kent SHENA identifies Objectively Assessed Needs (OAN) for Medway as being 1,281 dwellings per annum (dpa) over the period 2012-2037 does not represent the full OAN for Medway over the Plan period (2012-2035);
- The full OAN for Medway is 1,489 dpa in 2012-2035. This would need to be increased to 3,000 dpa for 2012-2035 to achieve the 744 affordable dwellings per annum identified in the North Kent SHENA;
- The Site could be developed in isolation given its size and continuous road frontage. However, the Site could also be developed as part of a wider strategic development to the East of Rainham. Analysis undertaken by MC in October 2013, as part of the now withdrawn Medway Core Strategy, directs that East Rainham is one of only two options that constitute reasonable alternatives to Lodge Hill.
- Development at the Site needs to be given consideration for the new Local Plan in accordance with National policy, irrespective of the outcome of Lodge Hill, particularly in light of the full OAN identified by Barton Willmore Research of 1,489 dpa for Medway over the Plan period (2012-2035) (**Appendix C**).
- In accordance with National policy, 'Land at Mierscourt Road, Rainham' should be allocated for residential-led mixed-use development as a sustainable development that can contribute to meeting the housing needs of Medway Council and the wider HMA.

2.0 NATIONAL POLICY

i) National Policy and Plan Making

- 2.1 The NPPF was published in March 2012. In general terms, the NPPF advocates a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development.
- 2.2 The NPPF (para 182) requires that, *"A local planning authority should submit a plan for examination which it considers is "sound" – namely that is"*:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 2.3 Paragraph 156 of the NPPF states that LPAs should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- The homes and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - The provision of health, security, community and cultural infrastructure and other local facilities; and
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.4 Paragraph 157 advocates that crucially Local Plans should:

- Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- Be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- Be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- Identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- Identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- Contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals (para 158).

2.6 The NPPF directs LPAs to prepare an evidence base which indicates that objectively assessed needs for market and affordable housing are met. LPAs should plan for a housing mix which takes into account “housing demand and the scale of housing supply necessary to meet this demand.” Household and population projections should also be a key consideration, taking into account of migration and demographic change (para 159).

ii) National Policy and Housing Need

2.7 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, ‘Objectively Assessed Needs’ for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including

identifying key sites which are critical to the delivery of the housing strategy over the Plan period.

- 2.8 LPAs must plan for a mix of housing that *"meets housing and population projections, taking account of migration and demographic change"* (para 159). Significant weight should also be placed on the need to support economic growth through the planning system (para 19).
- 2.9 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

(Reference ID: 2a-015-20140306)

- 2.10 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

- 2.11 The NPPF consultation (CLG, December 2015) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

iii) Duty to Co-Operate

- 2.12 The 'Duty to Co-Operate' as provided for in Section 110 of the Localism Act 2011, came into effect on 15 November 2011. The Duty was introduced under the 2011 Act to address the impact of the loss of the "top-down" effect from the Regional Spatial Strategy (The South East Plan) and to offer a transparent way in which authorities should relate to one another on cross boundary issues. The Duty is now shared between authorities requiring them to collaborate on cross-boundary matters and issues of sub-regional and regional importance, especially housing provision and related infrastructure issues.

- 2.13 Section 33A(2)(a) requires that local authorities “engage constructively, actively and on an ongoing basis” in the plan-making process. The NPPF refers to the ‘Duty to Co-operate’ in paragraphs 157 and 178-181. Crucially, paragraph 157 of the NPPF states that *“Local plans should be based on cooperation with neighbouring authorities...”*.
- 2.14 Paragraphs 178-181 are clear in directing LPAs as to the importance of the ‘Duty to Co-operate’ and the proactive approach necessary to ensure a collaborative approach to reflect individual Local Plans. Paragraph 179 states *“joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework”*.
- 2.15 Paragraph 182, as above, provides that an Inspector should assess *“whether the plan has been prepared in accordance with the Duty to Cooperate”* such that compliance with the Duty must also be reflected in the assessment of soundness.
- 2.16 In addition, in March 2014 the CLG published the PPG, to “reflect and support” the NPPF. The PPG contains considerable guidance on the Duty to Co-operate. This is largely due to the fact that the Duty to Co-operate has proved to be a contentious part of the NPPF, with numerous Local Plans being scrutinised at examination due to failure to fulfil the Duty.
- 2.17 The guidance emphasises the importance for LPAs to work together; stressing that *“Cooperation between local planning authorities, county councils and other public bodies should produce effective policies on strategic cross boundary matters. Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local planning authorities have approached others”* (Reference ID: 9-010-20140306).
- 2.18 The PPG also states that LPAs must *“engage constructively, actively and on an ongoing basis to maximise the effectiveness of the plan-making process”* (Reference ID: 9-001-20140306). The ultimate outcome of the engagement should be the production of effective policies on cross boundary strategic matters.
- 2.19 In summary, there are two aspects to the ‘Duty to Co-Operate’:
- ‘Duty to Co-Operate’ – the s33A legal test is a ‘process’ preparation test. The Duty is incapable of modification at an Examination. Therefore, this is one of the first things that has to be examined because, if the legal requirement is not met, then the Inspector must recommend non adoption of the Plan;

- Collaborative Joint Working – an aspect of soundness. It is primarily concerned with the 'positively prepared' and 'effectiveness' soundness test set out in paragraph 182 of the NPPF. This relates to outcome rather than process.

2.20 The 'Duty to Co-operate' between LPAs is a clear requirement of national planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in paragraph 156 (para 178).

2.21 In addition, paragraph 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged (para 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-Operate during the plan-making process (para 181).

3.0 HOUSING

Question 4 – Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

- 3.1 We do not consider that the approach and conclusions in assessing the housing need for Medway over the Plan period have been appropriately assessed. We do not consider that the housing need, as calculated by MC, is “sound” and in line with National policy.
- 3.2 The NPPF directs LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and identify the scale, mix and range of tenures that the local population is likely to meet over the Plan period. In addition, LPAs should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land (NPPF, para 159).

i) Medway Council OAN Work

- 3.3 MC has jointly produced a North Kent SHENA with Gravesham Borough Council, comprising a Baseline Report (March 2015) and SHMA (November 2015).
- 3.4 The North Kent SHENA identifies OAN for Medway as being 1,281 dpa over the period 2012-2037 based on the result of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates. This level of housing need has been taken forward in the LPIO (January/February 2016) to represent over the period 2012-2035.
- 3.5 Barton Willmore Research has undertaken a critique of the OAN of 1,281 dpa (**Appendix B**) and does not consider it to represent full OAN for Medway over the Plan period (2012-2035) for the following reasons:
- There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dpa, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The North Kent SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are ‘positively prepared’ an upward

adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;

- The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;
- The North Kent SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined (**Appendix B**) is considered inappropriate;
- The North Kent SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However, we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The North Kent SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The North Kent SHENA and LPIO (January/February 2016) identify significant affordable housing need (744 affordable dpa, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dpa if it were to be delivered in full. High Court Judgments confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the North Kent SHENA does not address the significant affordable housing need in Medway.

ii) **Barton Willmore OAN Work**

- 3.6 Given the fundamental flaws identified in MC's own OAN assessment as above, BW Research has undertaken an assessment of MC's full OAN figure. The Report is contained at **Appendix C** and an overview is provided below.

3.7 The Report has been prepared in accordance with the requirements of the NPPF to ensure that the Local Plan meets the full OAN for market and affordable housing in the HMA. The report identifies that:

- The 2012-based household projection series, with adjustment rate of 3.3% to take account of vacant and second homes, equates to an unadjusted dwelling requirement of **1,324 dpa in 2012-2035**. In accordance with the PPG, this should only be regarded as the 'starting point estimate';
- If a 10% uplift is applied to the 'starting point' estimate (in line with the 'modest' uplift applied by Inspector in recent Examination e.g. Eastleigh) to address worsening market signals, then this would bring housing need up to approximately **1,456 dpa in 2012-2035**;
- The 'starting point estimate' is considered an underestimate of future housing need as it projects suppressed household formation rates in the 25-44 age group over the Plan period. When undertaking sensitivity testing specific to local circumstances to alleviate the suppression in this age group, the starting point estimate would need to be increased to **1,489 dpa in 2012-2035**;
- To achieve 744 affordable dwellings per annum identified in the North Kent SHMA (November 2015), based on the 25% affordable housing provision, the housing requirement would need to be close to **3,000 dpa for the Plan period (2012-2035)**.

3.8 It is considered that the figure of 1,489 dpa for the Plan period would represent the full OAN for Medway, in order to take account of the latest ONS population projections in accordance with the PPG (Reference ID: 2a-017-20140306).

3.9 Overall, it is considered that the LPIO (January/February 2016) does not seek to meet the full and correct OAN for Medway. This matter should be addressed before the next iteration of the Local Plan as the current position is "unsound".

iii) Under Delivery of Housing

3.10 The Consultation on Proposed Changes to National Planning Policy (CPCNPP) (December 2015) indicates that CLG are intending to amend National planning policy to ensure appropriate action is taken where there is a significant shortfall between the homes provided for in Local Plans and the houses being constructed. A housing delivery test is proposed (as outlined in the Spending Review and Autumn Statement 2015 (HM Treasury, November 2015)). It is envisaged that this approach would compare the number of homes that LPAs set out to deliver in its Local Plan against the net additions in housing supply within the LPA area (CPCNPP, para 30).

Consequently, LPAs shall have to ensure that OAN figures are suitably robust and achievable in line with current National planning policy and the emphasis that is being placed on delivery rates.

- 3.11 This matter is particularly pertinent for MC following a recent Appeal Decision (APP/A2280/W/15/3002877) in which the Planning Inspector concluded that the substantial shortfall in previous years in housing delivery when set against the housing requirements, represented persistent under delivery (NPPF, para 47).
- 3.12 The CPCNPP considers that continued significant under-delivery of housing identified over a sustained period, as is the case for MC, should be addressed by appropriate action. The CPCNPP considers that one approach to addressing under delivery rates could be to identify additional sustainable sites if it has been shown that the existing approach is not delivering the housing required. Such sites would need to be in sustainable locations, with appropriate infrastructure available and which can be demonstrated as deliverable. To deliver such an approach, it is recognised that collaboration between developers and local communities, undertaking appropriate consultation would be required to undertake policy reviews, enabling additional land in sustainable locations to come forward (CPCNFF, paras 31 – 33).

Question 5 – What do you consider to be the appropriate housing market area for Medway?

- 3.13 The SHMA (November 2015) defines the Housing Market Area to comprise Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling.
- 3.14 MC should seek to work collaboratively under the 'Duty to Co-operate' to address the housing needs of neighbouring authorities and how housing can be delivered in the HMA that is influenced by other HMAs.

Question 6 – Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

- 3.15 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012-2037), the Local Plan period (2012-2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744 dpa), which would constitute 58% of MC's identified OAN figure of 1,281 dpa. The PPG advises that an increase in the total Local Plan housing figure should be

considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).

- 3.16 The need for affordable housing should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be given to ensure sustainable development and the deliverability of the Plan (para 173).
- 3.17 We would consider that based on the North Kent SHMA (November 2015), seeking the provision of up to 25% affordable housing is appropriate. An increase of the housing requirement to meet the full OAN figure of 1,489 dpa would both be in line with National policy (NPPF, para 47) and therefore “sound”, and contribute to achieving a greater number of affordable dwellings.

4.0 ENVIRONMENT

Question 30 – What are the most effective means to secure and strengthen Medway’s environment, in the context of the area’s development needs?

- 4.1 We would consider that one of the ways in which MC could strike a balance between securing and strengthening Medway’s environment and addressing the area’s development needs would be to allocate land that is capable of avoiding significant harm on biodiversity, or land that is capable of providing mitigation in accordance with the NPPF (para 118), such as incorporating open space that would be readily accessible on foot to proposed residents, thereby reducing development pressure on designated sites such as SPA or Ramsar.
- 4.2 As part of the now withdrawn Core Strategy, Medway Council produced a document entitled ‘Further Considerations of Strategic Mixed Use Development Options’ (September 2013) to assess potential development options for the area. In respect of Option 4, which considered expansion east of Rainham (inc. the Site), MC noted that this development would not have a direct impact on SPA, Ramsar, Scheduled Monuments or Ancient Woodland. Growth in this area was considered to help Medway meet its housing need, an approach which should be pursued in the new Local Plan. The Site is capable of accommodating on-site open space to mitigate indirect developmental pressures on the Medway Estuary and Marshes SSSI, SPA and Ramsar as necessary.

Question 32 – What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

- 4.3 Paragraph 113 of the NPPF directs that distinction should be made between the hierarchies of international, national and locally designated sites by setting criteria based policies, so that protection is proportionate with such status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks or landscape areas.
- 4.4 The Site is not subject to any International or National landscape designations and therefore its development should be considered proportionate to this context, in accordance with the NPPF.
- 4.5 The Site is however locally designated as an Area of Local Landscape Importance (ALLI) in the Medway Local Plan (2003). The designation is currently drawn tightly around the settlement boundaries of both Rainham and Gillingham, and under the terms of the policy development

will only be permitted if it does not materially harm the landscape character and function of the area; or the economic and social benefits of development outweigh the benefits of conserving the landscape.

- 4.6 It should be noted that in a recent Appeal Decision (APP/A2280/W/15/3002877), the Inspector noted that Medway Landscape Character Assessment (MLCA) (2011), in seeking to recognise and protect areas of recognised local landscape character, was not inherently inconsistent with the NPPF, however “the ALLE designations were not based upon a landscape character assessment” (paragraph 23) and therefore did not fully accord with the NPPF in this respect.
- 4.7 To be ‘Consistent with National policy’, the new Local Plan for Medway should set ‘criteria based’ policies against which proposals in protected landscape areas can be judged. In order for the new Local Plan to be ‘Justified’ in this respect, we recommend that a Medway-wide landscape review is undertaken to inform both the spatial strategy for the area and landscape based policies.
- 4.8 Notwithstanding the above recommendation, the Site is capable of providing a significant area of open space as part of the development proposals and provide on-site mitigation measures to protect the most sensitive parts of the Site.

5.0 BUILT ENVIRONMENT

Question 33 – What approach should we take to managing Medway’s heritage assets, particularly in the context of bringing forward regeneration?

- 5.1 In accordance with National policy, development should give great weight to the conservation of a designated heritage asset when considering the impact of a proposed development on the asset’s significance, which can be harmed or lost through alteration or destruction of the heritage asset or development within its setting (para 132).
- 5.2 The Site is located immediately to the north of Siloam Farm Oasthouse, which is a Grade II Listed Building. It is considered that the Site can be developed with mitigation measures in place to avoid substantial harm to the setting of this designated heritage asset in accordance with the NPPF.

Question 36 – What areas of Medway have weaker character and what are the opportunities for improvements?

- 5.3 The NPPF, within its core planning principles, directs that the planning system should take account of the different roles and character of different areas in both plan-making and decision-taking (para 17).
- 5.4 The new Local Plan should take account of the character of the Medway area and encourage opportunities to enhance and improve the area’s character, including through new development, which also benefits in contributing to meeting the area’s development needs.
- 5.5 In respect of Rainham, the LPIO (January/February 2016) describes the pedestrianised shopping centre as “rather tired” and states that there are “parts of the centre where an over-concentration of hot food takeaway uses is undermining its vitality and viability.”
- 5.6 The Site is partly located on the edge of the District Centre urban settlement boundary as defined on the Medway Local Plan (2003) Proposals Map. The Site is located approximately 0.5 miles from Rainham High Street (A2), connecting the Site to Rainham town centre, Gillingham and beyond.
- 5.7 Development at the Site would result in economic benefits, providing for a growing workforce that would represent a major boost to the local economy. Delivery would help to attract and retain skilled workers locally, supporting investment in high value job growth.

- 5.8 In the now withdrawn Core Strategy, East Rainham was one of a limited number of areas that was assessed as a realistic option for strategic housing growth in Medway as noted above. The Medway Core Strategy Major Sites Assessment (September 2013, page 27) recognises that strategic growth at East Rainham would “bring benefits to Rainham District Centre”.

Question 41 – What consideration should be given to strategic infrastructure and development in rural Medway?

- 5.9 Development should be focused in sustainable locations, and opportunities should be taken to focus development in proximity to existing local services and where sustainably located in the context of the wider area.
- 5.10 Rainham is a District Centre and is important in terms of the number of retail and service outlets. The Medway Local Plan (2003) states that Rainham provides:

A range of town centre services... comprising over 130 retail/service units... some with a speciality appeal. Independent retailers predominate in these centres. It has a compact retail area serving local needs and providing a number of community and cultural facilities. Several pubs and restaurants on the High Street provide a relatively vibrant evening economy... The nearby railway station provides connections to most of the other main district centres in Medway.

- 5.11 The Site also benefits from being in close proximity to Miers Court Primary School. Development at the Site represents a logical extension of the urban area, with good access to services, public transport, retail and facilities. The Site also has the potential to further enhance the level of services and facilities locally through on-site provision.
- 5.12 The Site is well served by a variety of modes of transport as noted in Section 9.0 of these representations. Developer contributions would be available to fund strategic infrastructure upgrades that are compliant with Community Infrastructure Levy (CIL) Regulations and it is considered that the Site can be developed without an unacceptable impact on highway capacity and safety.

6.0 OPEN SPACE

Question 52 – Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

- 6.1 We consider that open space provision for new development should take a balance between the two approaches. The provision of on-site open space should be considered within the context of each development site, assessing the potential feasibility of a development site to provide for on-site open space provision or whether contributions towards maintaining and enhancing the existing estate is deemed more appropriate.
- 6.2 The Site is capable of providing a significant area of on-site open space as part of the development proposals.

7.0 SPORTS FACILITIES

Question 54 – What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?

- 7.1 The NPPF (para 73) directs that planning policies regarding open space, sport and recreation facilities should be based on robust and up-to-date assessments that identify the specific needs and quantitative or qualitative deficits or surpluses of open space, sport and recreational facilities in the local area. As noted in the PPG, open space can provide health and recreational benefits, and also have an ecological value, form an important part of the landscape and setting of built development, and function as an important component in achieving sustainable development (Reference ID: 37-001-20140306).
- 7.2 MC should therefore undertake a robust assessment to determine the open space, sport and recreational facilities that are needed in the area, and produce new Local Plan policies on this basis.
- 7.3 The Site has the potential to provide sports facilities on-site, which is considered appropriate and beneficial to the development itself and for the surrounding context of East Rainham, and in line with the PPG (Reference ID: 37-001-20140306), forms an important component of sustainable development.

8.0 AGRICULTURAL LAND

Question 56 – What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

- 8.1 The NPPF (para 112) directs that LPAs should take into account the benefits of the best and most versatile (BMV) agricultural land. Where significant development is necessary on agricultural land, LPAs should seek to use areas of poorer quality land in preference to that of higher quality.
- 8.2 The NPPF does not preclude development on BMV land and a significant proportion of land in close proximity to urban areas is BMV. Therefore MC should seek to secure the area's development needs and achieve the economic, social and environmental dimensions of sustainable development without precluding development on BMV land.
- 8.3 The Site is currently shown as predominantly Grade 1 agricultural land on the standard ALC survey dataset. It is noted that nearby proposed developments at Land North of Moor Street (APP/A2280/W/15/3012034) and Land at Otterham Quay Lane (APP/A2280/W/15/3139962) have been subject to further survey work which established that the sites are predominantly Grade 2 agricultural land, not Grade 1 as originally envisaged.
- 8.4 The Site is in a sustainable location capable of achieving the economic, social and environmental dimensions of sustainable development.

9.0 TRANSPORT

Question 72 – What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

- 9.1 The NPPF (para 29) highlights the importance for the transport system to be balanced in favour of sustainable transport modes and providing users with a choice on how they travel, whilst acknowledging that different opportunities and measures will be required from urban to rural areas.
- 9.2 The new Local Plan for Medway should contain both transport policies and development allocations that support the achievement of sustainable development by locating new development within or adjacent to existing built up areas where existing infrastructure is in place.
- 9.3 The Site is well served by a variety of modes of transport, including pedestrian, cycle and bus routes, in addition to the private motor car. Public Right of Way (PRoW) GB18 passes through the Site, providing a connection to the wider PRoW network and countryside. National Cycle Network Route 1 passes to the north of the Site along Otterham Quay Lane. Bus Routes 120, 121 and 132 pass to the north of the Site and travel into Rainham and Chatham town centres. Furthermore, development of the Site is capable of enhancing the local provision in accordance with CIL regulations.

10.0 DELIVERABILITY

Question 77 – Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

- 10.1 We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account different viability between areas of Medway.
- 10.2 The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened"* (NPPF, para 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing, when taking account of the normal cost of development and mitigation, should provide competitive returns to a landowner/developer to enable the development to be deliverable.

11.0 DEVELOPMENT STRATEGY

Question 82 – Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

- 11.1 We consider that a range of development types, as outlined within the LPIO (January/February 2016), should be utilised in meeting Medway's growth requirements. This should be based on an overarching vision of sustainable development, as underpinned by National planning policy. When selecting development types, it is important to consider the aspiration and requirements of National policy.
- 11.2 The NPPF encourages LPAs in plan-making to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. LPAs should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community that are required in particular locations (NPPF, para 50).
- 11.3 Urban Extensions are identified in the LPIO (January/February 2016) as a pattern of residential development that could contribute to the area's development needs, being located in relatively close proximity to existing transport connections and communities. The Site is located in such close proximity, and is of sufficient scale to allow for the provision of services and facilities that would benefit new and existing communities.
- 11.4 Whilst the Site is not currently allocated in the Medway Local Plan (2003), the Site has previously been considered as part of a larger area as a potential option for strategic development through the Medway Core Strategy.
- 11.5 As part of the examination process for the Medway Core Strategy, Medway Council prepared three documents in late 2013 through its Sustainability Appraisal process to consider options for strategic development. This work was commissioned because of the Core Strategy Inspector's concerns about the deliverability of the proposals at Lodge Hill and whether alternatives had been objectively assessed through the Sustainability Appraisal process.

11.6 These three documents were:

- Medway Core Strategy - Further Consideration of Strategic Mixed Use Development Options – September 2013;
- Medway Core Strategy: Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) – Addendum to SA/SEA Report – October 2013; and
- Medway Core Strategy – Further SA/SEA – Additional information compiled by Medway Council following the workshop held on 4 October 2013.

11.7 The above documents identified seven strategic development options in Medway. Land East of Rainham is one of the identified options, including the Site. The larger East Rainham strategic option comprises 255 hectares of land comprising several land parcels put forward by a number of developers.

11.8 The Site could be developed in isolation given its size and continuous road frontage. However, the Site could also be developed as part of a wider strategic development to the East of Rainham. It is noted that the above 'Additional Information' document (04 October 2013) directs that East Rainham is one of only two options that constitute reasonable alternatives to Lodge Hill.

11.9 Medway Council previously considered the strategic options on the basis of whether they could be considered as a reasonable alternative to development at Lodge Hill. However, development at East Rainham needs to be given consideration for the new Local Plan, irrespective of the outcome of Lodge Hill, and particularly given Medway's identified full OAN figure.

11.10 Further detail on the Site and its development proposals are contained in the subsequent Section of these representations.

12.0 LAND AT MIERSCOURT ROAD, RAINHAM

i) The Site and its Surroundings

- 12.1 The Site comprises a single land parcel to the east of Mierscourt Road and is approximately 35.5 hectares in size. It is private open land and woodland, currently predominantly in agricultural use. The Site also comprises agricultural buildings associated with the current use and Orchard Cottage, which is currently in use as a kennels. The landform of the Site is generally flat.
- 12.2 To the south of the Site lies Siloam Farmhouse, which is a Grade II Listed Oasthouse. Further to the south of the Site is agricultural land that is known to have been promoted through the SLAA process for residential development. Immediately to the west of the Site lies the District Centre urban settlement boundary of Rainham, residential properties on Mierscourt Road and Miers Court Primary School (aged 4-11 children). To the north of the Site lies agricultural land, also known to have been promoted through the SLAA process for residential development, including land to the east of Mierscourt Road and south of Oastview, which is currently with MC for determination for 136 dwellings (MC Ref: MC/15/4539) on behalf of Redrow Homes. Further to the north of the Site is the settlement boundary of Rainham again and Rainham High Street (A2). To the east of the Site is Meresborough Road (a single track lane), and further agricultural land, some of which is again known to have been promoted through the SLAA process for residential development.
- 12.3 As such, whilst the Site is currently outside of the settlement boundary of the Medway urban area it is close to residential development, educational facilities and retail high street facilities further. Therefore, the Site lies within a sustainable location in close proximity to sites which have been put forward through the SLAA process to form a sustainable urban extension to Rainham.
- 12.4 The Site lies within an area defined by Mierscourt Road and Otterham Quay lane to the west, Canterbury Lane to the north, Seymour Road and South Bush Lane to the east and the M2 to the south. The area, which is predominantly agricultural land, is one of a limited number of areas immediately adjoining the Medway urban area that could accommodate strategic development to meet future housing needs.

ii) Development Proposals

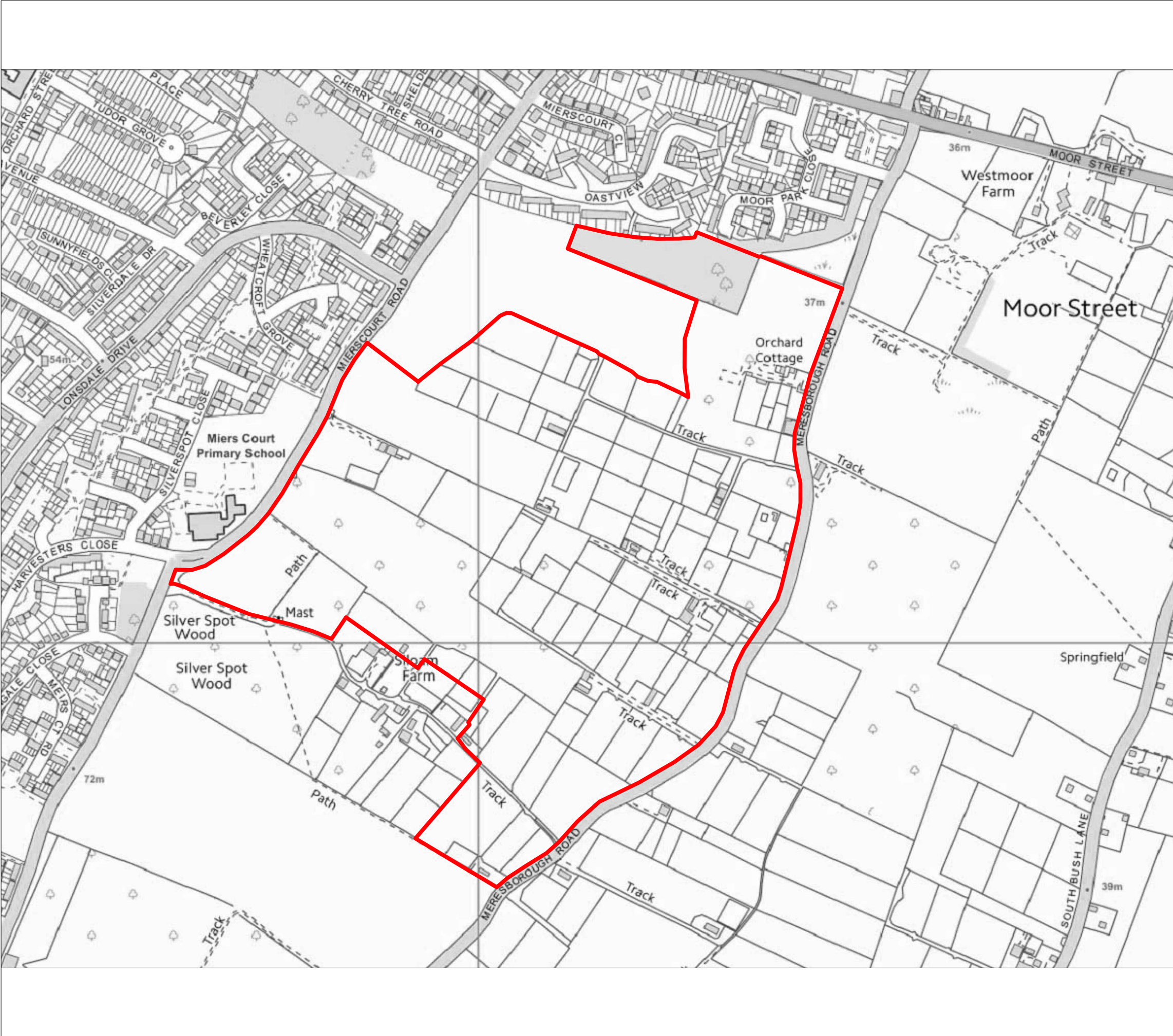
- 12.5 It is Taylor Wimpey's intention to promote the Site for residential-led mixed-use development comprising a mix of dwelling types and sizes including an element of affordable housing. It is anticipated that a total of approximately 800-900 dwellings could be delivered on the Site subject to further testing in addition to car parking provision, open space and potentially a range of services and facilities. Access points to the Site can be obtained from Mierscourt Road with potential additional access onto Meresborough Road subject to further analysis. The Site is in a sustainable location within close proximity to the Medway urban area.
- 12.6 The Site could be developed in isolation given its size, continuous road frontage, ability to provide a number of facilities on-site and location as a logical extension to the Medway urban area. However, the Site could also be developed as part of a wider strategic development to the East of Rainham.

13.0 CONCLUSIONS

- 13.1 Whilst we support Medway Council's intention to undertake a form of public consultation on a new Local Plan for the area, the LPIO (January/February 2016) is limited in content and is "broad" in the nature of questions it poses.
- 13.2 Based on the information available, we consider that there is further work to be done in order to ensure MC is working towards a "sound" Local Plan. Notably, the current identified housing figure needs to be revisited to identify full OAN, as required by National policy.
- 13.3 It is also vital that the evidence base, which should inform and underpin the Local Plan, is made available prior to any next stage of formal consultation on the Local Plan. Without these, MC will be unable to make an informed decision on future growth strategies for the area, nor will the public be able to make informed comments which in turn would assist MC.
- 13.4 As set out within the main body of this Report, MC should seek opportunities for sustainable development in accordance with National policy, such as at 'Land at Mierscourt Road' in recognition of the significant contribution such sites can make in meeting the development needs of the area.
- 13.5 The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151).
- 13.6 As acknowledged in the Medway Core Strategy Major Sites Assessment (September 2013), East Rainham is one of only two sites that constitute a reasonable alternative to development at Lodge Hill. However, development at East Rainham needs to be given consideration for the new Local Plan, irrespective of the outcome of Lodge Hill, particularly in light of the full OAN identified by Barton Willmore Research of 1,489 dpa for Medway over the Plan period (2012-2035) (**Appendix C**).
- 13.7 The future growth strategy for the Medway area should therefore make a provision for development at the Site in the new Local Plan.

APPENDIX A

SITE LOCATION PLAN (P01 REV A)



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
A Amended site boundary	26.02.16	JF	CA

LEGEND

Site Boundary

Project
**Land East of Rainham
Kent**

Drawing Title
Site Location Plan

Date	Scale	Drawn by	Check by
25.02.16	1:5,000 @ A3	JF	CA
Project No	Drawing No	Revision	
25962	P01	A	

0 50 100 150 200 250m

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APPENDIX B

OBJECTIVE ASSESSMENT OF HOUSING NEED: CRITICAL REVIEW (BARTON WILLMORE, FEBRUARY 2016)

MEDWAY COUNCIL

OBJECTIVE ASSESSMENT OF HOUSING
NEED

CRITICAL REVIEW

Prepared on behalf of Taylor Wimpey

February 2016

MEDWAY COUNCIL
OBJECTIVE ASSESSMENT OF HOUSING NEED
CRITICAL REVIEW
Prepared on behalf of Taylor Wimpey
February 2016

Project Ref:	20894/A5/DU/DM
Status:	Final
Issue/Rev:	02
Date:	29 February 2016
Prepared by:	DM DU
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29 February 2016

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1.0 INTRODUCTION

- 1.1 This Technical Note has been prepared by Barton Willmore on behalf of Taylor Wimpey, in order to review the Objectively Assessed Housing Need (OAN) determined for Medway Council as set out in the Council's Strategic Housing and Economic Needs Assessment (SHENA). The SHENA has been prepared in partnership with Gravesham Borough Council, however in this review we focus on the OAN for Medway only.
- 1.2 The review presented here has been undertaken in the context of the policies of the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guidance (PPG) requirements that a full, unconstrained OAN is prepared.
- 1.3 The review is structured as follows:

Section 2 provides an outline of the relevant National Planning Policy Framework (NPPF), the supporting Planning Practice Guidance (PPG), and Local Planning Policy.

Section 3 reviews the latest official demographic evidence for Medway, including:

- Latest ONS population and CLG household projections;
- ONS mid-year population estimates and past migration trends.

Section 4 provides a review of the SHENA in the context of the requirements of PPG's Housing and Economic Development Needs Assessment guidance (ID2a).

Section 5 summarises our critique of the SHENA to recommend an appropriate way forward in assessing overall housing need for Medway.

2.0 PLANNING POLICY CONTEXT

A) NATIONAL PLANNING POLICY

i) Introduction

- 2.1 The National Planning Policy Framework (NPPF, 27 March 2012) and the accompanying Planning Practice Guidance (PPG, 06 March 2014) set out the requirements within which local planning authorities should be setting their overall housing targets as part of a full objective assessment of overall need. These requirements are summarised below.

ii) National Planning Policy Framework (27 March 2012)

- 2.2 NPPF sets out the Government's planning policies for England and how these are expected to be applied. NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the Country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).
- 2.3 In respect of delivering a wide choice of high quality homes, NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).
- 2.4 Furthermore, it states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (paragraph 50).
- 2.5 With regard to plan-making, local planning authorities are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156).
- 2.6 NPPF states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework (paragraph 157).

- 2.7 Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of and strategies for housing and employment uses, taking full account of relevant market and economic signals (paragraph 158).
- 2.8 For plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should:

“prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries; The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

meets household and population projections, taking account of migration and demographic change;

addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).”¹

iii) Planning Practice Guidance (PPG, 06 March 2014)

- 2.9 PPG was issued as a web based resource on 6th March 2014. Guidance on the assessment of housing development needs (PPG ID: 2a) includes the SHMA requirement set out in NPPF and supersedes all previous published SHMA practice guidance (CLG, 2007).
- 2.10 The primary objective of the housing development needs assessment (the SHMA) is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002)
- 2.11 Housing need refers to the scale of housing likely to be needed in the housing market area over the plan period, should cater for the housing demand in the area and identify the scale of housing supply necessary to meet that demand. (PPG ID2a 003)
- 2.12 The assessment of need is an objective assessment based on facts and unbiased evidence and constraints should not be applied (PPG ID2a 004).

¹ Paragraph 159, National Planning Policy Framework, 27 March 2012;

- 2.13 Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

PPG methodology for assessing housing need

- 2.14 The full methodology is set out at ID 2a 014 to 029 (overall housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

Starting point estimate of need

- 2.15 The methodology states that the starting point for assessing overall housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends (ID2a 015).

"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing." (2a-015) (Our emphasis)

Adjusting for demographic evidence

- 2.16 The PPG methodology advises that plan makers may consider testing alternative assumptions in relation to the underlying demographic projections and household formation rates. It also states that 'account should be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates' (2a-017).

Adjusting for likely change in job numbers

- 2.17 In addition to taking into account demographic evidence the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems."
(2a-018)

- 2.18 The PPG also confirms the importance of ensuring sufficient growth in the working age population (16-64), at paragraph 2a-018 and 2a-21:

"Plan makers should make an assessment of the likely change in job numbers based on past trends and /or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area." (2a-018)

"When considering future need for different types of housing, plan makers will need to consider whether they plan to attract a different age profile e.g. increasing the number of working age people." (2a-021)

Adjusting for market signals

- 2.19 The final part of the methodology regarding overall housing need is concerned with market signals and their implications for housing supply (2a-019:020).

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." (2a-019)

- 2.20 Assessment of market signals is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards. Particular attention is given to the issue of affordability (2a-020).

"The more significant the affordability constraints ... and the stronger other indicators of high demand ... the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be." (2a-020)

Overall housing need

- 2.21 An objective assessment of overall housing need can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.

2.22 The extent of any adjustment should be based on the extent to which it passes each test. That is:

- It will at least equal the housing need number implied by the latest demographic evidence,
- It will at least accommodate projected job demand; and,
- On reasonable assumptions, it could be expected to improve affordability.

Affordable housing need assessment

2.23 The methodology for assessing affordable housing need is set out at 2a-022 to 029 and is largely unchanged from the methodology it supersedes (SHMA 2007). In summary, total affordable need is estimated by subtracting total available stock from total gross need. Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

"The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments ... An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." (2a-029) (our emphasis)

B) LOCAL PLANNING POLICY

i) Medway Council Local Plan – Issues and Options 2012-2035 (January 2016)

2.24 The Medway Council Local Plan Issues and Options Plan (draft Plan) represents the first formal stage of the Local Plan process, and sets out a strategy for development in Medway up to 2035.

2.25 In respect of the OAN for Medway, the Plan states the following:

"The Government requires Local Planning Authorities to determine the objectively assessed needs (OAN) for housing in their strategic housing market areas. Work carried out for the North Kent Strategic Housing and Economic Needs Assessment (SHENA) in 2015 has analysed demographic, economic and market signal information to assess the quantity and types of housing that will be needed to meet the projected growth in households over the plan period. This concludes that the Local Plan needs to make provision for up to 29,463 new homes by 2035."²

² Paragraph 7.8, page 21, Medway Council Issues and Options Consultation Document, January 2016

- 2.26 The OAN determined by the Strategic Housing and Economic Needs Assessment (SHENA) equates to 1,281 dwellings per annum over the period 2012-2037, not the plan period (2012-2035). The Plan states how the Council is committed to planning positively to meet the development needs of Medway.
- 2.27 The study Barton Willmore presents here provides a full critique of the SHENA to evaluate whether the OAN is positively prepared in line with the requirement of the NPPF.
- 2.28 The Issues and Options Plan also identifies Medway as a major economic hub within the South East region and Medway's location within the Thames Gateway offers excellent opportunities to stimulate business growth.
- 2.29 A key issue for the Local Plan will be:

"To secure a successful economic base in Medway, providing a range of jobs for residents and securing sustainable growth without exacerbating the need to travel to access high quality job opportunities."³

- 2.30 Furthermore, the Issues and Options Plan outlines the scale of economic growth forecast for Medway as follows:

"To forecast the scale and nature of economic growth anticipated in Medway over the plan period, calculations have been carried out based on an assessment of the population growth projections, the strengths of the local economic, knowledge of growth sectors, and impacts of major strategic developments such as London Paramount. The research has forecast a growth of around 17,200 new jobs in Medway up to 2037. Over half of these jobs are expected in non-B class activities, such as retail and healthcare."⁴

C) SUMMARY

- 2.31 The NPPF and PPG requires that in planning for future levels of housing, local authorities should boost significantly the supply of housing in their area that meets in full, the objectively assessed need for market and affordable housing. In doing so local authorities should;
- identify a scale of housing that meets household and population projections;
 - account for migration and demographic change in formulating housing requirements;

³ Paragraph 8.18, page 32, Medway Council Issues and Options Consultation Document, January 2016

⁴ Paragraph 8.19, page 32, Medway Council Issues and Options Consultation Document, January 2016

- ensure that assessment of, and strategies for, housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals; and
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing.

2.32 The following sections of this report provide an analysis of the starting point in objectively assessing overall housing need according to PPG – official ONS and CLG projections and estimates – and a full review of the SHENA and the OAN it determines for Medway. This will enable us to reach a conclusion as to whether the SHENA provides for full OAN.

3.0 HOUSEHOLD DEMOGRAPHICS

- 3.1 The PPG advises that the starting point for estimating overall housing need should be the latest household projections produced by the Department for Communities and Local Government (CLG) and that account should be taken of the most recent demographic evidence, including Office for National Statistics (ONS) population estimates.
- 3.2 This section reviews the latest official ONS demographic and CLG household data for Medway. Comparisons are made alongside the South East region and the national average.
- 3.3 To align with the assessment of housing need in the Council's draft Plan and the SHENA, we provide our analysis in this section (where possible) based on the 23-year period 2012-2035.

i) Historic population growth – ONS Mid-Year Population Estimates

- 3.4 Medway is currently estimated to have a population of 274,000 according to the ONS 2014 Mid-Year Population Estimates. Since 2001 Medway's population has grown by 24,300 which is equivalent to a rate of 9.7%. Medway's rate of population growth is slightly lower than the national average (9.8%) and lower than the regional average (10.6%) as shown in Table 3.1.

Table 3.1: Historic population change (2001-2014)

	2001	2014	2001-2014 change	
			No.	%
Medway 249,70	0	274,000	24,300	9.7%
South East	8,023,400	8,873,800	850,400	10.6%
England 49,449,7	00	54,316,600	4,866,900	9.8%

Source: Mid-Year Population Estimates, Office for National Statistics

All figures have been individually rounded to the nearest one hundred and may not sum

Percentages have been calculated using unrounded numbers

- 3.5 Population changes as a result of net migration and natural change. Table 3.2 provides the detailed components of change for Medway.

Table 3.2: Components of population change – Medway

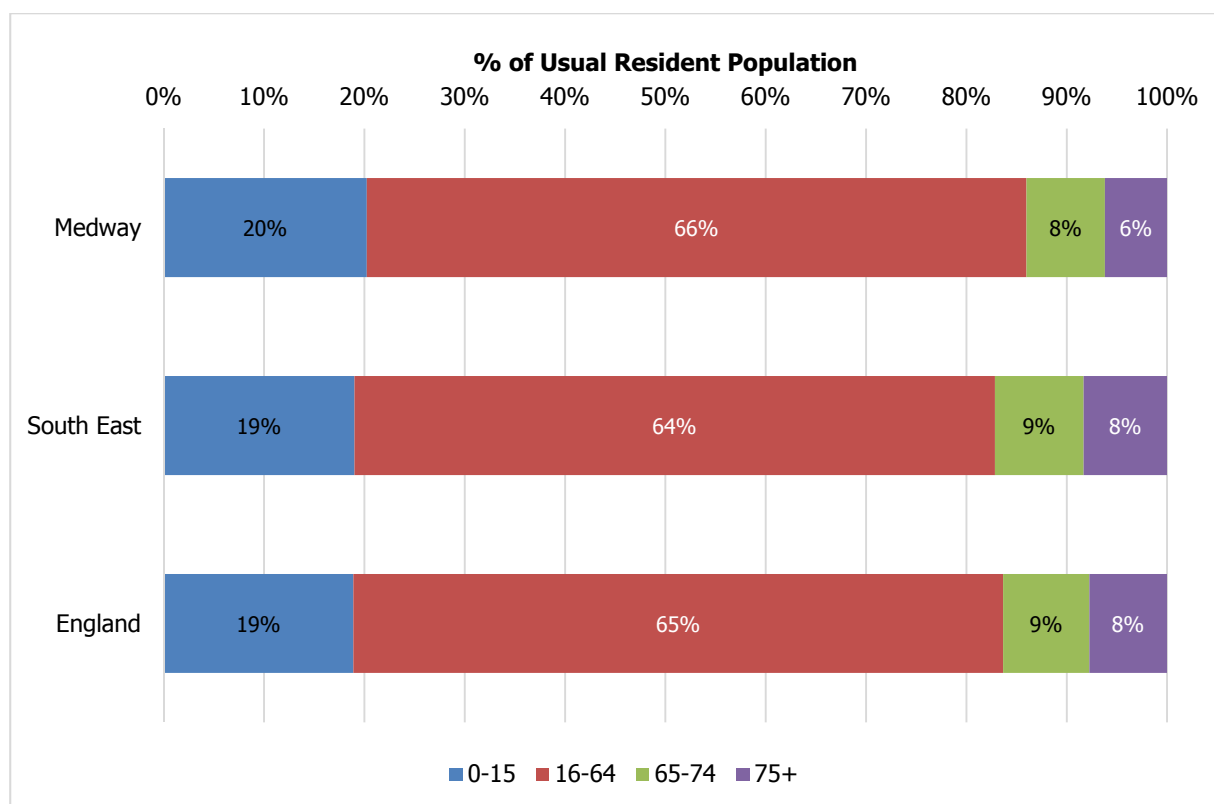
	Natural change	Net Migration	Other changes	Total change
2001/02 8	79	-250	-71	558
2002/03	1046	-270	121 897	
2003/04 9	88	-782	94	300
2004/05 1	,030	-691	300 639	
2005/06 1	,033	115	232 1,380	
2006/07 1	,247	969	130 2,346	
2007/08 1	,304	998	98	2,400
2008/09 1	,383	374	249 2,006	
2009/10 1	,450	776	282 2,508	
2010/11 1	,539	652	-44	2,147
2011/12 1	,546	1,793	-6	3,333
2012/13 1	,452	1,280	155 2,887	
2013/14 1	,510	1,296	104 2,910	
Average 2001/14	1,262	482	126 1,870	
Average 2007/12	1,444	919	116	2,479
Average 2009/14	1,499	1,159	98	2,757
Average 2004/14	1,349	756	150	2,256

Source: Mid-Year Population Estimates, Office for National Statistics

- 3.6 At the start of the decade Medway experienced net outward migration. However, since 2005 net migration to Medway has been positive meaning that more people have moved to Medway than moved out.
- 3.7 Medway has also experienced positive natural change (more births than deaths) which has increased between 2001 and 2014. In addition there is positive 'other' change (change that is not possible to identify as either migration or natural change) equating to 1,640 people, or an average of 130 people per annum over the period 2001-2014.
- 3.8 Over the period 2001 and 2014, population change in Medway has largely been as a result of natural change (67%). However more recent trends reflect a shift in the components of population change as a result of net migration increasing considerably since 2011.

- 3.9 Medway has a younger age profile than the regional and national averages, with a larger proportion of the population aged 0-15 years and 16-64 years, as shown in Figure 3.1.

Figure 3.1: Age profile, 2011



Source: 2011 Census

ii) Office for National Statistics (ONS) population projections

- 3.10 The ONS produces population projections for all local authority areas in England. These are referred to as the Sub National Population Projections (SNPP) and are published by the ONS usually every two years.
- 3.11 The ONS SNPP are trend-based projections. That is, they project forward past demographic trends in births, deaths and migration. They do not take account of any future changes to government policy which may affect these past trends.
- 3.12 Table 3.3 sets out the official ONS SNPP in chronological order from the 2008-based series to the most recent 2012-based SNPP (29 May 2014). The 'interim' 2011-based SNPP and 2012-based SNPP take account of findings from the 2011 Census of the population. Growth is considered over the period 2012-2033 (2008-based) and 2012-2037 (2012-based). However, in line with the Medway Plan period, growth has also been considered over the period 2012-2035. The shorter period presented in respect of the 2008-based series is due to the projections finishing in 2033.

Table 3.3: ONS Population Projection series for Medway

Series	2012	2021	2033/35	2037		2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	268,200	290,500	322,700*	326,800		22,300 (2,480)	54,500 (2,370)	58,600 (2,340)
2011-based (interim)	267,300	290,300				23,000 (2,560)		
2008-based	257,600	269,700	286,300**			12,100 (1,340)	28,700 (1,370)	

Source: Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding

*2035;

**2033.

- 3.13 The latest 2012-based SNPP project significantly higher population growth than the previous full 25-year projection series (the 2008-based SNPP) and marginally higher growth than the interim 2011-based series. This is expected given the analysis presented earlier in this chapter which shows net migration to Medway increasing in recent years.
- 3.14 Despite the 2012-based SNPP projecting the highest population growth, it is important to note that the 2012-based SNPP are underpinned by trends captured over the 2007-2012 period. This period was characterised by an economic recession and for this reason, resulted in atypical migration trends in some areas.
- 3.15 From reference to the 2012-based ONS SNPP components of change, the 2012-based ONS SNPP is underpinned by average net in-migration of 840 people per annum, 2012-2035. However, analysis of net migration trends from the period 2007-2012 from which the 2012-based SNPP trends are drawn puts average net migration at 919 people per annum. This compares to the most recent long-term trend (2004/5-2013/14) of 760 people per annum and the most recent 5-year trend (2009/10-2013/14) of 1,160 people per annum.
- 3.16 The analysis of migration trends for Medway therefore suggests a short-term trend in Medway is a prudent base from which to plan. However, whilst the most recent 5-year migration trend suggests higher net migration to Medway (largely influenced by the three most recent years) than the 2012-based SNPP, it is not possible to say with any certainty whether Medway will see a continued rise in migration. On this basis, the 2012-based SNPP are considered to provide a reasonable demographic projection for Medway.
- 3.17 However, the 2012-based SNPP are considered to represent the very minimum of future population growth in Medway given the 2012-based SNPP are considered to be conservative due to the national projections which underpin them. The 2012-based SNPP are constrained to the 2012 National Projections published in 2013. The national projection is based on an

assumption of 165,000 net international migrants coming into the UK per annum, and this assumption is projected forward per annum over the full 25 years of the 2012-based SNPP period. However net international migration of 165,000 people per annum conflicts significantly with the latest migration statistics report by the ONS, which shows net international migration of 336,000 people in the year ending June 2015, over double the 2012-based SNPP assumption.

- 3.18 The ONS appear to have noted this significant increase in net international migration, recently publishing the 2014 National Projections and assuming 185,000 net international migrants per annum. However this remains significantly lower than has been seen in the recent past. Although the forthcoming 2014-based ONS SNPP (expected May 2016) will project higher population growth across the country on the basis of these revised 2014-based National Projections, the assumption of 185,000 net international migrants per annum remains a very conservative estimate on the basis of recently recorded trends.
- 3.19 In this context the 2012-based SNPP are considered to be underpinned by assumptions which lead to a minimum level of population growth over the Plan period (2012-2035). Therefore the projected population growth presented in Table 3.3 is very likely to be conservative given that Medway is historically a net receiver of international migrants.
- 3.20 It is important to be aware of the issues related to the SNPP because the CLG household projections underpinned by the 2012-based SNPP. The household projections are derived by applying household representative rates to the ONS population projections. Household projections will be discussed in the next section.
- 3.21 The 2012-based ONS SNPP project the working age population to grow at a much slower rate than the population as a whole as is shown in Table 3.4. Given the extension of State Pension Age, there will be an increasing number of people working beyond the age of 64 years and therefore it is also important to consider the projected growth of the 65-74 year old population.

Table 3.4: Working Age Population Change, 2012-2035

Age Group	Medway
16-64 18,0	50 (10.3%)
65-74 11,9	00 (53.5%)
Total (16-74 years)	29,950 (15.2%)
Total (all ages)	57,800 (21.8%)

Source: 2012-based SNPP, Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding. Percentages calculated using unrounded numbers.

- 3.22 It is evident from Table 3.4 that the growth in the working age population (16-74 years) in Medway is heavily driven by the growth in the population aged 65-74 years (53.5% growth). Realistic assumptions need to be applied as to how greatly people over the age of 65 years can contribute to the resident labour force.
- 3.23 The PPG states 'where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns' (PPG, ID2a, 018). Whilst the 2012-based SNPP do project an increase in the working age population in Medway, further work is required in order to determine whether the level of workforce growth is sufficient to support the projected level of job growth.

iii) Communities and Local Government (CLG) household projections

- 3.24 Table 3.5 sets out the official CLG household projections in chronological order from the 2008-based series to the most recent 2012-based series (27 February 2015).

Table 3.5: CLG Household Projections for Medway

Series	2012	2021	2033/35	2037	2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	108,190	120,470	137,640*	139,950	12,280 (1,360)	29,450 (1,280)	31,760 (1,270)
2011-based (interim)	107,970	119,320			11,350 (1,260)		
2008-based	107,470	116,090	125,890**		8,620 (960)	18,420 (880)	

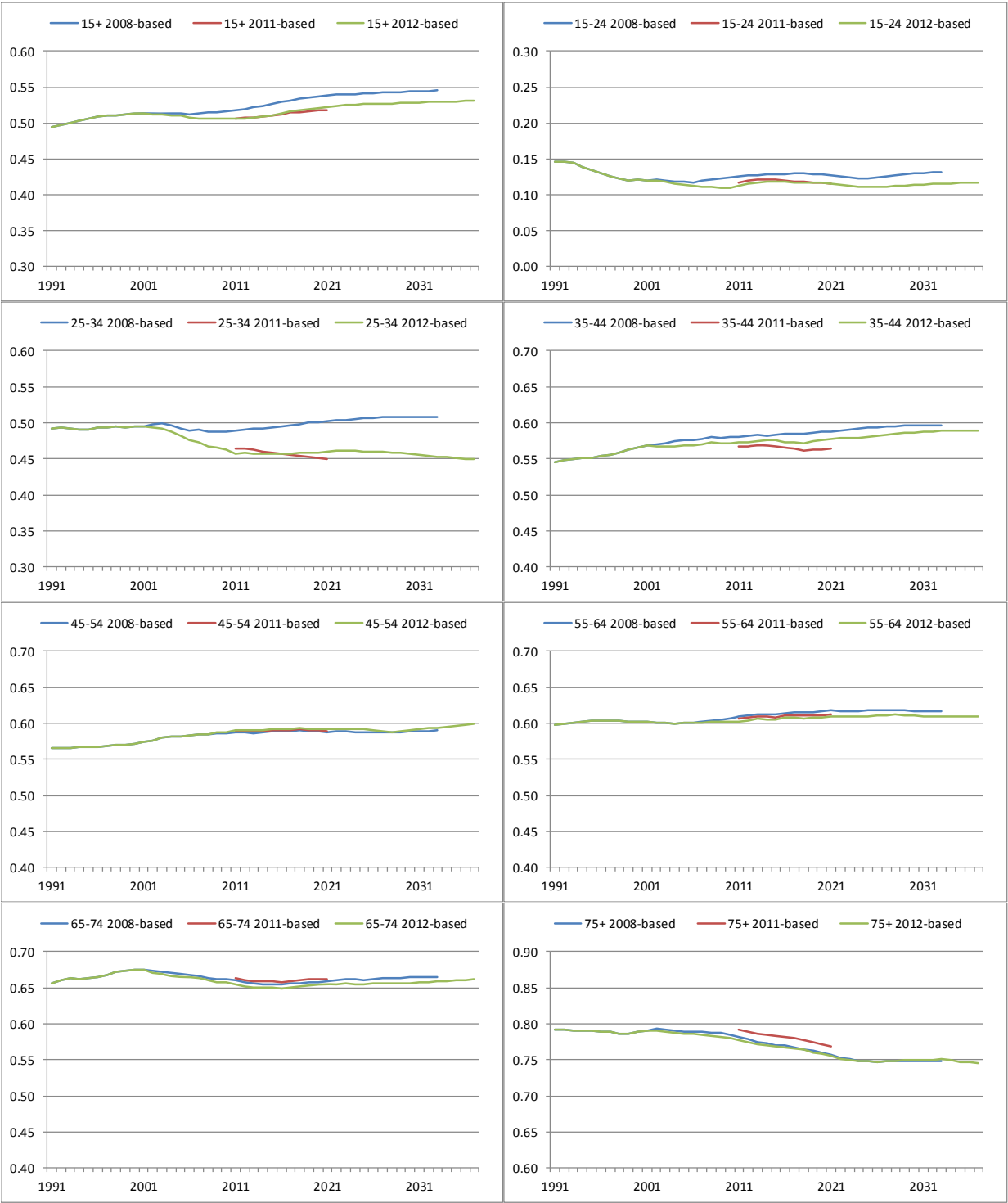
Source: (CLG) Communities and Local Government (rounded to nearest 100) Note: Figures may not sum due to rounding
*2035; **2033

- 3.25 As the PPG states the CLG projections should form the 'starting point estimate' only of overall housing need as part of a full objective assessment of need. The latest CLG 2012-based household projections show growth of 1,280 households per annum in Medway over the Plan period (2012 and 2035). To reach a dwelling requirement, account needs to be taken of vacant and second homes. For Medway this rate is 3.27%⁵ resulting in a dwelling projection of 1,323 dwellings per annum, 2012 to 2035.
- 3.26 The growth projected by the CLG 2012-based household projections is higher than the growth projected by the previous two series of household projections (the 'interim' 2011 and 2008-based series), but this is expected given the 2012-based SNPP projected higher population growth than the other two series.

⁵ CLG, CTB 2014 (Second Homes); CLG Live Table 125/615 (Vacant)

- 3.27 However, like the 2012-based SNPP, the 2012-based household projections are also underpinned by recessionary trends in relation to household formation, whereas the 2008-based projections are underpinned by trends gathered prior to the recession and are therefore higher in terms of projected household formation, particularly in younger age groups.
- 3.28 The CLG have published household formation data for the 2012-based household projections (household formation rates by age and gender). The rates show that household formation in the 2012-based projection still projects a declining household formation rate trend in the 25-34 and 35-44 age groups (see Figure 3.2 below) when compared with the interim 2011-based and 2008-based projections.
- 3.29 The interim 2011-based household projections were widely regarded to project forward very low household formation in younger age groups. This was due to the trends underpinning the projections covering the period just prior to and including the recessionary period, when housing became rapidly less affordable for people in the younger age groups due to a lack of supply.
- 3.30 Figure 3.2 illustrates that the 2012-based rates for Medway follow a similar trajectory to that of the interim 2011-based projections before them. After 2025 the 2012-based projection shows a declining trend which results in the gap between the 2008 and 2012-based rates increasing, and suppression in the 2012-based rate worsening.

Figure 3.2: Household Formation Rates, Medway



Source: CLG

- 3.31 The trend for declining household formation in the 25-44 age group is likely to be caused in part by worsening affordability. Planning for housing on the basis of a continuation of these suppressed household formation rates is not supported by PPG which recommends adjustments to households formation rates to reflect factors not captured in past trends (ID 2a-015).
- 3.32 Furthermore, planning on the basis of the 2012-based household formation rates is not considered to be in accordance with the principles of positive planning, and would likely place significant pressure on housing supply. Recent Planning Inspectorate decisions concur with this view.⁶
- 3.33 In this context, and given that the 2012-based projections show slightly lower household formation particularly for 25-44 year olds than the pre-recessionary 2008-based projections, it is considered that an adjustment needs to be made to comply with the National Planning Policy Framework's (NPPF) clear policy to 'boost significantly' the supply of housing, 'promote economic growth' and 'positively prepare' Local Plans.
- 3.34 How this adjustment should be applied has been subject of much debate, and there is not considered to be one correct answer, as it is a matter of judgement. However Barton Willmore would suggest a blended approach whereby the 2012-based HFRs are applied in all age groups, as published, with the exception of the 25-44 age group. In this age group it is considered that a gradual return to the projected 2008-based HFRs by the end of the Plan period is applied. This is considered to comply with the NPPF requirement to ensure that Local Plans are positively prepared, and a significant boost is made to housing supply.

iv) Housing Completions

- 3.35 A lack of housing completions can have a significant impact on the ability for people to move into an area to live, and for existing residents to have the opportunity to purchase their own property. A lack of housebuilding can lead to existing residents having to migrate out of the area. Table 3.6 sets out net completions for Medway over the past 10 years.

⁶ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

Table 3.6: Net Completions, Medway

Year	Net Completions	Plan Target	Surplus/Deficit
05/06 562		700	-138
06/07 591		815	-224
07/08 761		815	-54
08/09 914		815	+99
09/10 972		815	+157
10/11 657		815	-158
11/12 809		1,000	-191
12/13 565		1,000	-435
13/14 579		1,000	-421
14/15 483		1,000	-517
Total	6,893	8,775	-1,882

Source: Annual Monitoring Report

- 3.36 As Table 3.6 shows, since 2005/06 the number of completions has consistently fallen below Development Plan targets, with the exception of two years (08/09 and 09/10). This has resulted in a deficit of -1,882 dwellings over 10 years, representing 20% of planned supply.
- 3.37 Furthermore when compared against the official CLG household projections set out above in Table 3.6, the starting point estimate of need has been at least 1,260 per annum, which suggests under-delivery has been even worse than the comparison against Plan targets.
- 3.38 Notwithstanding this it is considered that this persistent under-delivery in Medway will have had a significant impact on the propensity of people to migrate into the area over the last 10 years. The net-migration trends can therefore be considered to have been constrained by a lack of delivery.

v) Summary

- 3.39 In summary, this section has considered the most up-to-date official population and household projections published by CLG and ONS. The key headlines from this section are as follows:
- The PPG emphasises that CLG household projections should only form the 'starting point' in an objective assessment of the overall housing need, and that sensitivity testing based on alternative demographic and household formation assumptions may be considered;

- This 'starting point estimate' is currently growth of 1,281 households per annum in Medway, using the latest 2012-based CLG household projections over the period 2012-2035 (Medway's plan period). Applying a household/dwelling adjustment (to account for vacancy and second home rates) the overall housing need is 1,323 dwellings per annum;
- However, Barton Willmore consider that growth of 1,323 dwellings per annum could represent an underestimate of demographic-led housing need for a number of reasons:
- The 2012-based household projections are based on household formation rate trends observed over the recessionary period, when affordability worsened significantly. There remains suppression in the household formation rates for 25-34 year olds in Medway. PPG states that adjustments may be required to the household projection estimate of need if rates have suppressed historically (paragraph 15). An adjustment in Medway is considered necessary in the 25-34 age group to address this suppression;
- Analysis of net housing completions has highlighted that annual completions have consistently fallen below the level of need required by consecutive Development Plans, and below official CLG household projections, inhibiting the propensity of people to migrate into Medway. This would have directly influenced the net migration trends underpinning the 2012-based ONS SNPP and the 2012-based CLG household projection;
- The 2012-based ONS SNPP are also considered a conservative projection in respect of the international migration assumption they are underpinned by (165,000 people per annum). This is less than half the most recent trend data from ONS shows (336,000 people per annum).
- Analysis of migration trends has concluded that the 2012-based SNPP provide a reasonable basis on which to assess demographic-led need in Medway at this point in time. However, for the reasons set out above the 2012-based SNPP should be considered a very minimum and if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase, then an updated short term migration should be considered.

3.40 This section identifies how the starting point estimate of OAN (1,323 dpa, 2011-2031) for Medway should be considered a very minimum.

3.41 The following section of this study considers the evaluation of official ONS and CLG data in the context of the Council's OAN evidence.

4.0 REVIEW AND CRITIQUE OF THE STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

A) INTRODUCTION

- 4.1 The Strategic Housing and Economic Needs Assessment (SHENA) dated November 2015 provides the evidence base to support the Council's determination of Objectively Assessed Need (OAN) for housing in Medway. The report has been prepared by Bilfinger GVA.
- 4.2 In the context of our assessment of demographic data in the previous section of this study, the following section provides an analysis and evaluation of the SHENA's approach to OAN in Medway. The analysis we present follows the methodological requirements of section ID2a – 'Housing and Economic Development Need Assessments' (HEDNA) to determine whether the Council's proposed housing target (1,281 dwellings per annum) represents full, unconstrained OAN.
- 4.3 It is important to note that the SHENA has assessed OAN over the period 2012-2037 which is the time period considered by the latest 2012-based projection series. However, the draft Local Plan covers the period 2012-2035.

B) NORTH KE NT STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

- 4.4 The 2015 SHENA seeks to establish the OAN for Medway following the methodology outlined in PPG. We would comment on the SHENA as follows:

i) Housing Market Area (HMA)

- 4.5 The SHENA begins with an assessment of the appropriate HMA in which to assess housing needs for Medway as required by PPG (ID 2a-010-20140306). The assessment's analysis draws on research published by CLG in 2010 titled 'Geography of Housing Market Areas'. In essence this research is based on work undertaken by the Centre for Urban & Regional Development Studies (CURDS) at Newcastle University.
- 4.6 The CURDS analysis is correctly presented by the SHENA as identifying Medway as falling within the London Strategic Housing Market Area which contains over 70 local authority areas. The SHENA considers this HMA definition is unmanageable and impractical (paragraph 2.9). Barton Willmore concurs with this conclusion.

- 4.7 For this reason, the SHENA also considers travel to work and migration patterns, and house price data and concludes that Medway has strong relationships with a number of neighbouring local authority areas. On this basis, the SHENA identifies a wider HMA which includes: Medway; Gravesham; Swale; Maidstone; and Tonbridge & Malling. The housing needs of the wider HMA are assessed in the SHENA
- 4.8 Barton Willmore consider the HMA definition applied in the SHENA to be inconsistent with the approach adopted in several of the authorities included within the definition. For example, Swale's housing needs were considered in isolation at the recent (November 2015) Local Plan Examination after the evidence base suggested Swale formed a HMA on its own. Similarly, Maidstone Borough are assessing their housing needs in isolation. Although Maidstone's SHMA identifies functional relationships between Maidstone and Medway, the Maidstone SHMA concludes that there is justification to distinguish Maidstone from Medway in market terms⁷. On this basis, the Maidstone SHMA considers Maidstone represents a HMA on its own.
- 4.9 On the basis of Maidstone Council and Swale Council both assessing their needs in isolation, Barton Willmore, for the purposes of this critique, consider Medway's needs in isolation.

ii) Starting point estimate

- 4.10 The SHENA gives detailed consideration to the latest 2012-based ONS Sub National Population Projections (SNPP) and CLG household projections as representing the 'starting point' estimate of need. Growth of 1, 270 households per annum over the period 2012-2037 is correctly presented. However, it is important to note that over the period covered by the draft Local Plan (as presented in the current Issues and Options consultation as being 2012-2035) growth is 1,280 households per annum. The SHENA does not present this.

iii) Demographic adjustments

- 4.11 The PP G (paragraph ID2a-017) states how plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest ONS population estimates.

⁷ Paragraph 2.39, page 29, Maidstone Strategic Housing Market Assessment – Maidstone Borough Council, Final report, January 2014, GL Hearn

Adjustment to household formation rates

- 4.12 The SHENA does not undertake any sensitivity testing in relation to household formation.
- 4.13 The analysis presented in Chapter 3 of this report has shown clear suppression in household formation for those people aged 25-44 years, which Barton Willmore considers should be addressed through making an adjustment to the rates.
- 4.14 The danger of planning on this basis of the 2012-based household formation rates would be to exacerbate this suppression over a 23-year Plan period, adding to the trend of worsening affordability in Medway, and the inability of first time buyers to form their own households. This is not considered to comply with the NPPF requirement to positively prepare Development Plans.
- 4.15 Recent appeal decisions⁸ have agreed that there remains an element of suppression in the 2012-based household formation rates. A more positive approach to household formation in this age group would increase the starting point estimate above 1,270 households per annum (2012-2037)/ 1,280 households per annum (2012-2035).

Adjustment to the demographic projections

- 4.16 The SHENA presents three sensitivity scenarios with regards to the underlying population projections as an alternative to the published 2012-based ONS SNPP.
- 4.17 The **first** demographic sensitivity scenario included by GVA incorporates the 2013 and 2014 Mid-Year Population Estimates (MYPE), published by the ONS after the 2012-based SNPP were published. Despite the 2013 and 2014 MYPE projecting higher population growth than projected in the 2012-based SNPP, the effect of the SHENA incorporating the 2013 and 2014 MYPE into the 2012-based SNPP is to reduce household growth from 1,270 to 1,235 households per annum (2012-2037).
- 4.18 This seems counterintuitive (a point which the SHENA also raises at paragraph 5.38). However, the SHENA states that the reduction in household growth is due to the different age/ gender profile applied as a result of taking account of the 2013 and 2014 MYPE. This requires further investigation through bespoke modelling to establish whether this statement is correct.

⁸ Coalville and Cornwall

- 4.19 The **second** is a long-term (2005-2014) net-migration scenario which results in household growth of 1,148 households per annum – again lower than the ‘starting point’ estimate for 1,270 households per annum (2012-2037) as indicated by the 2012-based CLG household projections. This scenario projects household growth that is 10% lower than the starting point estimate.
- 4.20 Lower household growth is the result of lower projected population. The long-term trend (2005-2014) projects lower population growth because net migration is assumed to be lower (756 net migrants per annum) compared to the average net migration assumption of the 2012-based ONS SNPP (840 people per annum based on trends from the period 2007-2012).
- 4.21 At paragraph 5.39 the SHENA states that the later years of the inter-Census period (2001-2011), and the last three years since the 2011 Census (2012-2014) show the highest levels of population growth in Medway since 2001. The SHENA then goes on to state how the 2012-based CLG household projections are underpinned by trends drawn “principally from this period of high growth”⁹, and it is therefore appropriate to consider longer term trends from 2004-2014.
- 4.22 In this regard the latest Planning Advisory Service (PAS) guidance on OAN summarises the problems of using the 2007-2012 period as follows:

“The base period used in the latest official projections, 2007-12, is especially problematic. The period covers all of the last recession, in which migration was severely suppressed as many households were unable to move due to falling incomes and tight credit. Therefore the official projections may underestimate future migration - so that they show too little population growth for the more prosperous parts of the country, which have been recipients of net migration in the past. If so, by the same token the projections will also overestimate population growth for areas with a history of net out-migration.”¹⁰

- 4.23 Whilst Barton Willmore do not disagree with the consideration of longer term trends, the PPG supports adjustments to the ‘starting point’ estimate of need in relation to the underlying demographic projections and household formation rates. However, PPG states that any local changes would need to be clearly explained and justified on the basis of the established sources of robust evidence (ID 2a-017-20140306). In this instance, consideration of longer term trends does not seem appropriate for Medway as a analysis of components of population change (see

⁹ Paragraph 5.39, page 93, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

¹⁰ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

Table 3.2 presented in Chapter 3 of this report and Figure 29 of the SHENA) clearly identifies net migration to Medway increasing since 2011. Therefore to consider a level of net in-migration lower than the 2012-based ONS SNPP in Medway is considered to wholly contradict the advice of the PAS Guidance.

- 4.24 GVA have chosen not to analyse a more recent 5-year trend, a decision Barton Willmore do not consider to be justified.
- 4.25 Analysis of migration trends, presented in Chapter 3 of this report, has illustrated that a more recent 5-year migration trend (2009/10 – 2013/14), which incorporates the last few years of recession, and the recent economic upturn, suggests net migration of 1,159 per annum. This is higher than the assumptions which underpins the 2012-based SNPP (840 migrants per annum) based on trends from the period 2007-2012.
- 4.26 However, there is not sufficient data at this point in time to say with any certainty whether Medway is experiencing a reversal of trend in terms of net migration. For this reason, despite a more recent 5-year trend showing higher net migration than the 2012-based SNPP, it is considered that the 2012-based SNPP provide the most reasonable demographic projection at this point in time. However, the 2012-based SNPP should provide the very minimum projection of population growth given the issues highlighted in Chapter 3 of this report. Furthermore, we reserve the right to amend this approach if subsequent releases of Mid-Year Population Estimates indicate that net migration to Medway is continuing to increase.
- 4.27 A **third** sensitivity scenario is the long-term net-migration scenario (2005-2014) including the 'unattributable population change' (UPC) recorded by ONS for Medway. The UPC is an element of population change which the ONS cannot account for. There is the possibility that it may be due to under recorded levels of international migration, but it could equally be due to other reasons.
- 4.28 The effect of including UPC within the long-term migration trends scenario is to reduce household growth to 1,124 households per annum (compared to growth of 1,148 households per annum excluding UPC) over the period 2012-2037.
- 4.29 Barton Willmore's approach is to exclude UPC from demographic modelling scenarios. This is based on the following:
- ONS' confirmation that UPC has been excluded from the calculation of the 2012-based ONS SNPP;

- Advice sent by email from ONS to Barton Willmore that it would be 'sensible' to exclude UPC from the calculation of net-migration trends;
- The ONS statement that if UPC was due to international migration, its effect would have been in the first half of the decade, after which the recording of international migration was improved;
- Local Plan Examination decisions where UPC has been excluded (Aylesbury Vale, Eastleigh, Arun). In the case of the most recent decision in Arun (February 2016), UPC was significant, yet the Inspector noted that if UPC were to be attributed to migration, errors would have been earlier in the 2001-2011 period;
- The ONS' statement that UPC is only applicable to the 2001-2011 period and does not introduce a bias that will continue in future projections.

4.30 The UPC scenario is therefore not considered to be a robust scenario for growth in Medway.

4.31 The SHENA presents demographic-led need in Medway to be between 1,124 and 1,270 households per annum over the period 2012-2037 based on the results of the two long-term migration trend scenarios. Once an allowance for vacancy has been applied this results in dwelling growth of between 1,167 and 1,317 dwellings per annum.

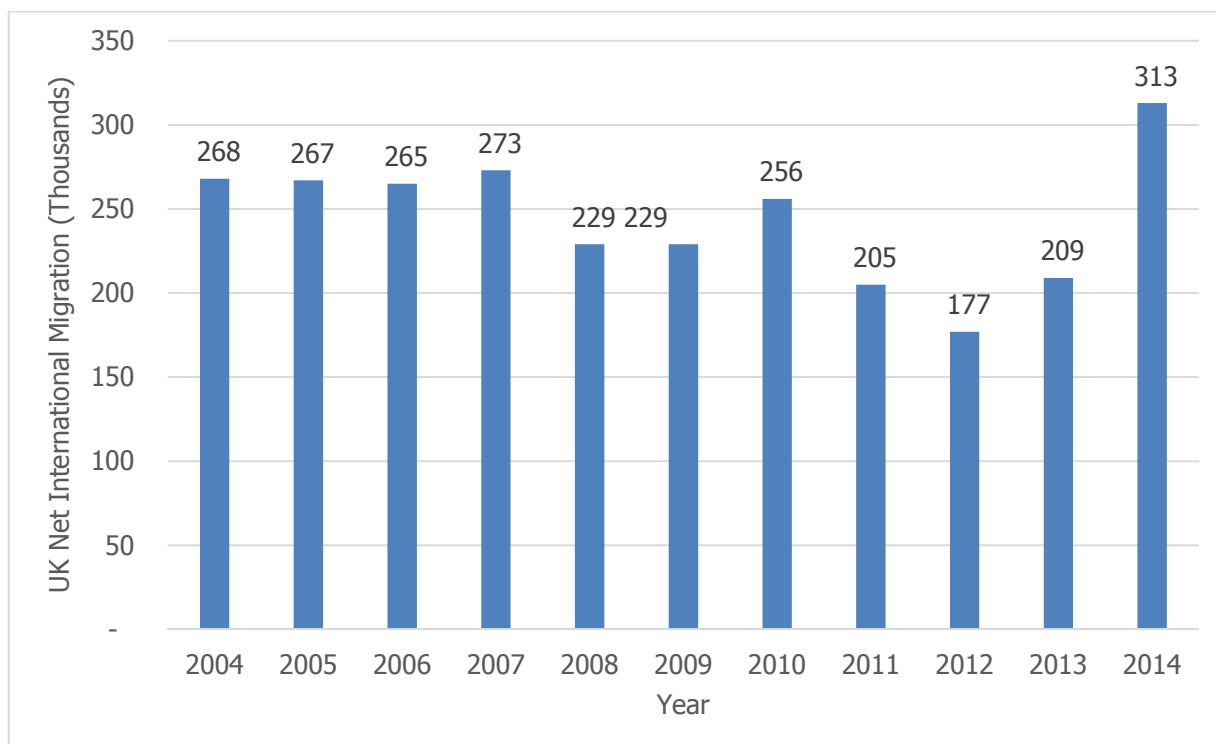
4.32 However, the SHENA acknowledges that due to the uncertainty of UPC, it is appropriate to consider an average of the two long-term migration scenarios (including and excluding UPC)¹¹. This results in growth of 1,136 households (1,179 dwellings) per annum over the period 2012-2037.

4.33 Barton Willmore consider that OAN of less than the 2012-based CLG household projection should not be considered, for the following reasons:

4.34 First, the 2012-based ONS SNPP were underpinned by net migration trends between 2007 and 2012, and as this analysis shows, they are underpinned by three years (2008-2011) when net in-migration fell significantly below two of the years prior to the 2007-2012 period. This contradicts GVA's statement that the later years of the 2001-2011 period show the highest levels of growth. This statement by GVA is not considered to be justified.

¹¹ Paragraph 5.47, Page 95, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

- 4.35 The **second point** concerns the assumption of net international migration in the 2012-based ONS National Projections, which underpin the 2012-based ONS SNPP. The 2012-based ONS national population projections are based on net international migration of 165,000 people per annum continuing every year up to 2037.
- 4.36 The assumption of net international migration in the ONS 2012-based national projections is considered by Barton Willmore to be a significant underestimate. This view is based on more recent evidence from ONS which shows how international net-migration was 336,000 people in the most recently recorded year (ending June 2015) – over double the 2012-based ONS national projection assumption. The 10-year average has also been circa 240,000 people per annum (see Figure 4.1 below).
- 4.37 On this basis alone, it is considered the 2012-based ONS SNPP, and therefore the 2012-based CLG household projections, are based on conservative assumptions and for this reason should be considered a minimum projection of future growth.
- 4.38 This is emphasised further by the more recent 2014-based national projections (29 October 2015) which have increased the assumption to 185,000 people per annum. The effect of this increase will be seen in the 2014-based SNPP, which are due for release in the first half of 2016.
- 4.39 A further effect on in-migration is the delivery of housing. Table 3.6 in this study has shown how delivery has fallen below planned targets in all but two of the past ten years. The cumulative effect has been for a deficit in delivery of 1,882 dwellings (20% lower than planned supply). This will have constrained in-migration to Medway, and trends would have been higher if planned housing targets had been met and the homes were there to be filled.

Figure 4.1: UK Net International Migration, 2004-2014

Source: Migration Statistics Quarterly Report, November 2015

4.40 Finally it is considered the past three years net in-migration to Medway (1,280, 1,293, and 1,793 people per annum respectively) highlight how the 2012-based SNPP and CLG projections are based on a conservative net in-migration assumption of only 840 people per annum.

4.41 However, given there is no degree of certainty as to whether Medway is experiencing a reversal of trend in relation to net migration, it is considered that the 2012-based SNPP at the very least should provide the minimum projection of future population growth. On this basis, for the Medway SHMA to favour the long-term migration trend approach (which projects lower population growth) is considered inappropriate.

4.42 In summary, it is not considered justified to project lower population or housing growth than the starting point estimate.

iv) Adjustments to support economic growth

4.43 The approach applied by GVA in the SHENA to economic-led OAN is generally considered robust, save for the assumptions in respect of job growth forecasts. GVA use a single source, Experian Economics, from quarter 1 of 2015. Experian is considered a robust source of job growth forecasts, however it is Barton Willmore's view that an average forecast should be taken from three sources; Experian Economics, Cambridge Econometrics, and Oxford Economics. This

view has been taken following criticism of the use of using a single source in some Local Plan examinations, given the fluctuation in forecasts, which are often published on a quarterly basis. This triangulated approach was supported by the South Worcestershire Local Plan Inspector¹².

- 4.44 In terms of unemployment assumptions, Barton Willmore's approach would be to assume a return to pre-recessionary rates of unemployment over the first ten years of the Plan period. This is a similar approach to the GVA method although they do differ slightly.
- 4.45 Economic activity rate assumptions must also be entered into demographic modelling software to generate the labour force growth required to fill jobs. GVA's approach is to use the Kent County Council 'Technical Paper Activity Rate Projections to 2036' paper (October 2011). This is the same source used by Barton Willmore, and is considered to be a robust independent method which provides unbiased assumptions of how economic activity will increase in older age groups over the next 25 years. However it should be noted that a more recent (November 2014) paper is available and this should be used in preference to the October 2011 edition.
- 4.46 The SHENA also undertakes a sensitivity test of economic activity which incorporates assumptions from Experian's Report 'Employment Activity and the Ageing Population' which has the effect of increasing economic activity of women in line with past trends from 1981, along with significantly increase economic activity for older people.
- 4.47 The commuting ratio is the final assumption which can have a significant effect on economic-led housing need. GVA's approach is to use the 2011 Census ratio of 1.28, and for this to remain static over the Plan period. This is considered a robust approach to apply.
- 4.48 The SHENA considered three economic scenarios but only presented the results of two – the Sector Based Growth scenario and the Sector Based & London Paramount Indirect Scenario. Housing need to support both economic scenarios increases above the baseline demographic needs (1,179 dwellings per annum as indicated by the mid-point of the two long-term migration trends) if KCC economic activity rates are applied; to support the Sector Based Growth scenario 1,197 dwellings per annum are required and to support the London Paramount Indirect scenario a total of 1,213 dwellings per annum are required.
- 4.49 If Experian's economic activity rates are applied, housing need to support both economic scenarios is below the baseline demographic need (1,020 dpa required to support Sector Growth scenario and 1,036 dpa to support the London Paramount scenario).

¹² Stage 1 of the Examination of the South Worcestershire Development Plan; Inspector's Further Interim Conclusions on the Outstanding Stage 1 Matters, 31 March 2014

- 4.50 It is important to note that the level of housing need identified from both economic scenarios and both economic sensitivity tests, is below the 'starting point' estimate of 1,270 households/1,317 dwellings per annum (2012-2037) as indicated by the CLG 2012-based household projections.

v) **Market signals adjustment**

- 4.51 The GVA report provides a summary of median **house price** increases in Medway between 2000 and 2013. The source used by GVA in obtaining this information (CLG) is considered robust. As GVA summarise, between 2000 and 2013, values in Medway increased by 128.6%; the second fastest rate observed out of seven authorities analysed. The rate also exceeded inflation in the south east region as a whole (96%).¹³
- 4.52 The SHENA's summary of rental prices shows a significant worsening in the lower quartile **rental prices** in Medway. Over the short period analysed (2010-2014), lower quartile rents increased by 10%; the second highest of the seven authorities analysed. This represents an increase of double that experienced in the south east region (4.3%), and triple the increase across England (3.3%). There is a clear affordability problem in respect of lower quartile rents in Medway when compared to surrounding areas.
- 4.53 The change in the **affordability ratio** is often the most crucial of market signals indicators, and the GVA report provides a summary of the lower quartile and median affordability ratios in Medway, compared to seven Kent authorities, the south east region, and nationally. The GVA report highlights how the lower quartile affordability ratio in Medway had increased by 65% between 2000 and 2013, and that this increase represents a more acute increase than the region (51%) and nationally (65%).¹⁴ This highlights how affordability has significantly worsened in Medway over the thirteen years analysed.
- 4.54 This study (section 3) identifies how household formation is suppressed in the 25-34 age group in the most recent 2012-based CLG household projections. The result of assuming the formation rates as published, and planning for growth based on them, will be a failure to address the significant increase in **concealed households** in Medway between the 2001 and 2011 Censuses. This increase across the country has been due to the significant worsening affordability of housing, leading to two or more adult households living with one another rather than forming their own households.

¹³ Paragraph 5.90, SHENA

¹⁴ Paragraph 5.97, SHENA

- 4.55 This trend is evidenced in Medway by the 68% increase in concealed households between the 2001 and 2011 Census'. This is broadly comparable to the regional and national averages (71%) although the SHENA states that concealment is not deemed to be worsening at a significant rate. However, the rate of increase in Medway is higher than in Canterbury (66%), Sevenoaks (56%), and Tonbridge and Malling (54%).
- 4.56 Furthermore the SHENA acknowledges a 13.03% increase in concealed households in the under 25 age group (13%). This is higher than the national average (12.76%) and several other Kent local authorities (Canterbury, Dartford, Maidstone, and Swale).¹⁵ Despite this, the SHENA concludes that the market signals information in respect of concealed families does not provide strong evidence of supplied pressures in Medway¹⁶. Barton Willmore disagree and a response in establishing the OAN for Medway is needed to alleviate this worsening trend.
- 4.57 The **rate of development** is also considered as a market signal, with the PPG stating how future supply should be increased to reflect the likely under-delivery of a Plan, if the rate of development has been lower than the planned number. A meaningful period must be assessed in line with PPG, and as this study has shown (Chapter 3), delivery in Medway has been 20% lower than the planned number over the past 10 years.
- 4.58 The GVA report also identifies this lack of delivery, but over the intercensal period (2001-2011) rather than the last 10 years considered in this study (2005-2014). Notwithstanding this difference, GVA identify growth in Medway's housing stock of 7.3%; lower than the sub-regional, regional, and national averages. Furthermore GVA identify how completions have exceeded planned targets in only three of the 12-year period between 2001/02 and 2012/13¹⁷.
- 4.59 In summary, it is important to note the PPG, which states the following in respect of market signals:

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings."¹⁸

"Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections."¹⁹ (Our emphasis)

¹⁵ Table 5.1, SHENA

¹⁶ Paragraph 5.108, SHENA

¹⁷ Paragraph 5.118, SHENA

¹⁸ ID2a-019, Housing and Economic Development Needs Assessments, PPG

¹⁹ ID2a-020, Housing and Economic Development Needs Assessments, PPG

- 4.60 In the context of the PPG, and the analysis set out by GVA, it is clear that an upward adjustment to the CLG household projection for Medway is required. Failure to do so will only serve to exacerbate the conditions which have led to the affordability problems experienced in Medway over the past 10 to 15 years.
- 4.61 The PPG does not quantify the market signals uplift, other than to say how “planmakers should set this adjustment at a level that is reasonable” and “on reasonable assumptions could be expected to improve affordability.”²⁰ Local Plan Examination decisions are the only source in which market signals adjustments have been quantified. At the Eastleigh Local Plan Examination, the Inspector recommended a 10% uplift to demographic-led projections in order to alleviate market pressure considered as “modest”. This level of uplift was considered “cautious” by the Inspector.²¹ The same level of uplift was also considered applicable by the Uttlesford Local Plan Inspector.
- 4.62 An equally cautious uplift of 10% to the 2012-based CLG household projection in Medway would result in an increase to at least **1,456 dwellings per annum**.
- 4.63 The SHENA considers the level of uplift the economic-led scenarios with KCC economic activity rates applied would make to the baseline demographic level of need (mid-point between the two long term migration trends). This is presented as between a 1.5% and 2.9% uplift which is not considered sufficient to respond to the local market signals.²² Barton Willmore agree.
- 4.64 As an alternative, the SHENA also considers the level of uplift the CLG 2012-based household projections, updated to take account of the 2013 and 2014 MYPE, provides to the mid-point of the two long-term migration trends. This is presented as being equivalent to an 8.6%, which the SHENA considers a significant uplift.²³
- 4.65 On this basis the **SHENA concludes on OAN for Medway of 1,281 dwellings per annum** (2012-2037) as indicated by the CLG 2012-based household projections updated to take account of the 2013 and 2014 MYPE.
- 4.66 Barton Willmore do not consider the market signals uplift applied in the SHENA to be sufficient. The SHENA’s ‘uplift’ is applied to the SHENA’s long-term migration trend which is already below the starting point estimate according to PPG. Therefore even applying the market signals ‘uplift’ results in OAN that is still below the starting point estimate (1,281 dpa compared to 1,323 dpa).

²⁰ ID2a-020, Housing and Economic Development Needs Assessments, PPG

²¹ Paragraphs 39-41, Eastleigh Borough Local Plan, Inspector’s Report, February 2015

²² Paragraph 5.129, SHENA

²³ Paragraph 5.130, SHENA

vi) Affordable housing need

- 4.67 As stated in the NPPF, LPAs are required to ensure their local plans meet OAN for both market and affordable housing. The *Satnam v Warrington BC* High Court Judgment provides useful guidance on the proper exercise that needs to be undertaken to assess affordable need as part of OAN. That is:

“(a) having identified OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes; (our emphasis)

(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPG, paragraphs 14 and 47.”²⁴

- 4.68 The *ELM Park v Kings Lynn and West Norfolk BC* High Court Judgment (July 2015) provides a more recent judgement on the role of affordable housing need within OAN, determining that affordable need did not have to be met in full when determining OAN but rather:

“This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA “addresses” these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area.”²⁵

- 4.69 It is therefore clear that where there is significant affordable housing need, although it is not required to be met in full, an increase should be considered.

- 4.70 In the context of this, the Council’s draft Plan states the following in respect of affordable housing need in Medway:

“The Strategic Housing Market Assessment (SHMA) carried out in 2015 for Medway identified a high level of demand for affordable housing, at 17,112 over the plan period. The Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial analysis indicates that a percentage of 25 % affordable housing would be deliverable on developments of over 15 units, taking into account land values and development costs.”²⁶ (our emphasis)

²⁴ Paragraph 43 (iv) (a) and (b), High Court Judgement CO/4055/2014, *Satnam Millennium Limited v Warrington Borough Council*, 19/02/2015

²⁵ Paragraph 33, page 11, High Court Judgement CO/914/2015, *Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government*, *ELM Park Holdings Ltd*, 09/07/2015

²⁶ Paragraph 7.12, page 21, Medway Council Issues and Options Consultation Document, January/February 2016

- 4.71 This is a significant level of affordable housing need, equating to 744 affordable dwellings per annum. To deliver this level of affordable housing in full, at provision of 25%, would require full OAN of circa 3,000 dwellings per annum, 2012-2035. It is accepted that 3,000 dwellings per annum is unrealistic, but a figure in excess of the Council's existing target would help to meet some of this affordable need.

vii) Summary

- 4.72 In summary, the SHENA identifies OAN for Medway as being 1,281 dwellings per annum over the period 2012-2037 based on the results of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates.
- 4.73 This level of housing need has been taken forward in the draft Local Plan to represent need over the period 2012-2035.
- 4.74 OAN of 1,281 dwellings per annum is not considered to represent full OAN for Medway over the plan period (2012-2035) for the following reasons:
- There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dwellings per annum, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The GVA SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
 - The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;

- The GVA SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The GVA SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The GVA SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 2.5%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet a affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 This review of the Strategic Housing and Economic Needs Assessment (SHENA) has considered the objectively assessed need (OAN) for housing over the period 2012-2037 which has been taken forward in the Medway Council Plan Issues and Options document which is planning for housing needs over the period 2012-2035. **Full OAN is presented in as being 1,281 dwellings per annum over the period 2012-2035.**
- 5.2 In short it is considered the OAN presented in the SHENA plans for very low levels of demographic growth over the Plan period, and does not represent a positively prepared OAN. From the outset, it is important to note how the level of OAN presented in the SHENA is below the PPG's starting point estimate of need – the latest CLG household projection (1,323 dpa, 2012-2035).
- 5.3 The SHENA's OAN conclusion is underpinned by applying 2012-based household formation rates to their preferred population projection (a revised 2012-based ONS SNPP scenario to reflect 2013 and 2014 ONS Mid-Year Population estimates). The 2012-based CLG household projection projects suppressed household formation for those aged 25-44 years of age; those most likely to represent concealed households and first time buyers. Barton Willmore consider it necessary to apply an adjustment to address this suppression and positively prepare the Local Plan, an exercise which has not been undertaken in the SHENA. This approach is supported by recent Planning Inspectorate decisions, which note continuing suppression in the 2012-based CLG projections.²⁷
- 5.4 Notwithstanding that the starting point estimate of OAN (1,323 dpa, 2012-2035) is higher than the Council's proposed level of provision, the starting point estimate should be considered a very minimum for a number of reasons.
- 5.5 The 2012-based CLG household projection is underpinned by the 2012-based Sub National Population Projections (SNPP) which assume very low net international migration to the UK (165,000 people per annum) compared with more recent trends (336,000 people in the last recorded year), an assumption which filters down to local authority level and has been identified by recent Local Plan Inspector's decisions²⁸. PAS Guidance also identifies how the net migration of the 2012-based ONS SNPP may well be an underestimate²⁹.

²⁷ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁸ Paragraph 1.12, page 3, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁹ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

- 5.6 Furthermore, analysis of migration trends has identified that the net migration assumptions of the 2012-based SNPP (840 net migrants per annum, 2012-2037) is low in the context of a more recent 5-year trend given that net migration to Medway has increased over recent years.
- 5.7 However, because it cannot be said with any certainty whether Medway is experiencing a reversal of trend in respect of migration, it is considered reasonable to use the 2012-based SNPP as the most appropriate demographic population projection at this point in time. However, if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase then it would be considered appropriate to change this approach.
- 5.8 With the above points in mind, it is considered that the 2012-based SNPP should provide the very minimum projection of population growth in Medway.
- 5.9 The approach to assessing an uplift for economic growth is considered to be broadly sound. However it is considered that the use of only one forecast is a weak approach. Given the fluctuation of job growth forecasts, Barton Willmore would recommend an average of the three leading forecasting houses; Experian Economics, Cambridge Econometrics, and Oxford Economics. This approach was endorsed by the South Worcestershire Local Plan Inspector.
- 5.10 The SHENA does not suggest a direct uplift to account for worsening market signals. The SHENA acknowledges that some market signals in Medway have worsened to a greater extent than neighbouring local authorities, the south east region, and the national average. The PPG states that an upward adjustment to the demographic starting point should be applied in the event that any of the market signals indicators show a worsening trend. The SHENA considers the level of uplift the economic scenarios provide to be insufficient, however, the 8.6% uplift provided by the CLG 2012-based household projections (adjusted to take account of the 2013 and 2014 MYPE) is considered by the SHENA to provide a significant uplift.
- 5.11 Barton Willmore do not agree. The level of uplift considered by the SHENA is considered in the context of a baseline demographic level of need that is already 10% below the starting point estimate (1,136 compared to 1,270 households per annum) over the period 2012-2037. In effect, the uplift considered by the SHENA still falls below the starting point estimate of need as indicated by the CLG 2012-based household projections, and which Barton Willmore consider to provide a conservative projection of future housing need.
- 5.12 The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local

Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

Way Forward

- 5.13 The PPG states how the OAN should be an unconstrained assessment. The SHENA's approach to OAN is not considered to comply with the PPG in this regard, and sets an OAN below the PPG's starting point estimate. Adjustments for household formation suppression, more recent migration trends, worsening market signals, and affordable housing need indicate a requirement for OAN significantly higher than the starting point estimate of OAN, 1,323 dwellings per annum (2012-2035). The OAN suggested by the SHENA is considered to be wholly inappropriate and not positively prepared, as required by paragraph 182 of the NPPF.

APPENDIX C

OBJECTIVE ASSESSED HOUSING NEED: DASHBOARD (BARTON WILLMORE, FEBRUARY 2016)

Objectively Assessed Housing Need

Medway Unitary Authority

February 2016 (updated)



Introduction

Planning Practice Guidance (PPG) on Housing and Economic Development Needs Assessments (26 March 2015) outlines the methodology for assessing housing need in the housing market area. The assessment should be an objective and unconstrained assessment based on facts and unbiased evidence.

This report summarises objectively assessed housing need for [Medway Unitary Authority](#). Although there are links with Greater London, it is considered pragmatic to consider Medway Borough as a District-wide HMA.

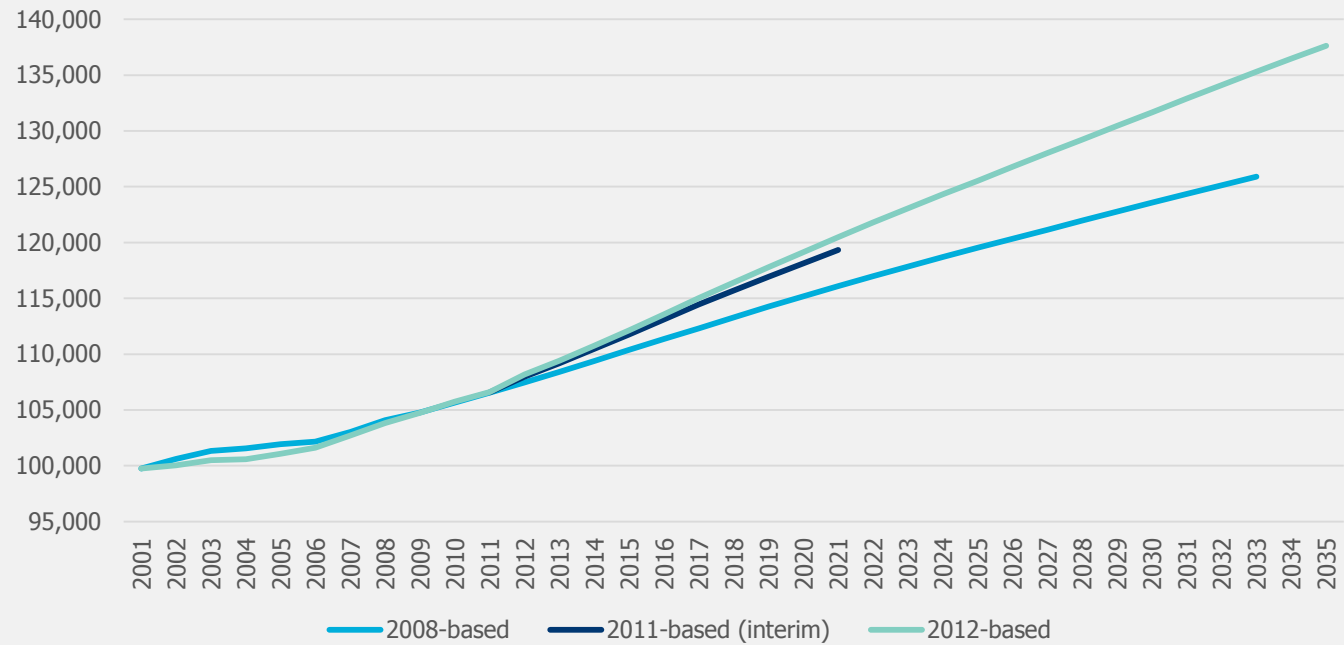
OAN Methodology

Following PPG, Barton Willmore's approach to assessing housing need is as follows.

1. Identify the [starting point estimate](#) of need and apply [demographic adjustments](#) to address household suppression and/ or to test alternative migration trends
2. Assess the labour force capacity of the demographic assessment and, if necessary, apply an uplift to support [job growth](#) in line with current forecasts and/ or past trends
3. Analyse [market signals](#) identified by PPG as; land prices, house prices, private rents, affordability, rate of development and overcrowding. A worsening trend in any of these indicators will require an upward adjustment to planned housing numbers
4. Establish whether the modelled housing need would meet [affordable housing need](#) or whether any further adjustment is necessary

This report provides a streamlined summary of these key issues. Further detail on modelling assumptions can be found the in accompanying Barton Willmore OAN Methodology statement.

CLG Household Projections: Medway

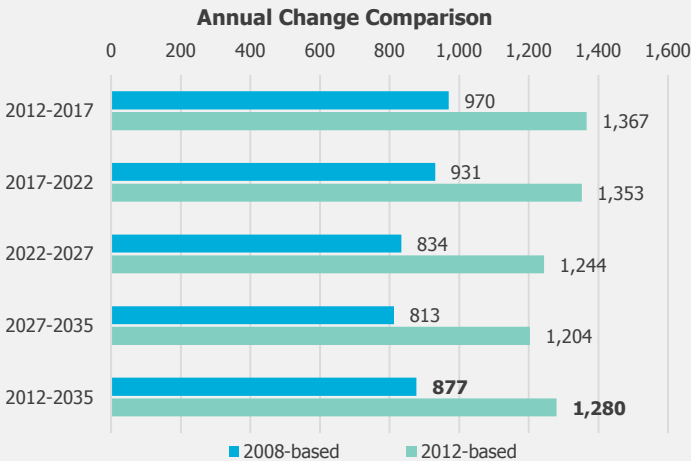


Household projections published by the Department for Communities and Local Government (CLG) should provide the starting point estimate of overall housing need.

The most recent series are the 2012-based household projections published on 27 February 2015. These project growth of **1,280 households per annum** in Medway over the period 2012-2035. Once an allowance for vacancy and second homes has been applied (3.3%) this equates to growth of **1,324 dwellings per annum**.

The 2012-based CLG projection projects a significantly higher level of household growth than the previous full projection (2008-based series) despite the falling levels of household formation projected in the 25-44 age group (see household formation opposite).

This suggests that household growth in Medway is largely being driven by higher population growth experienced in the area in recent years.

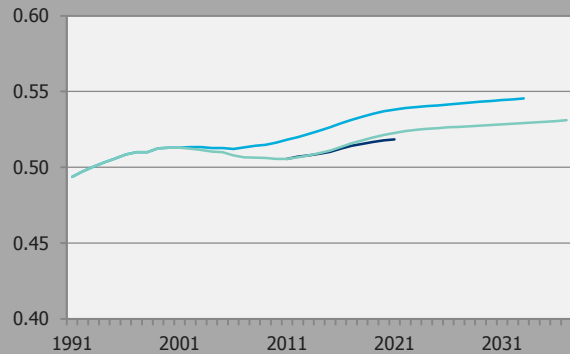


Source: Communities and Local Government (CLG) Household Projections

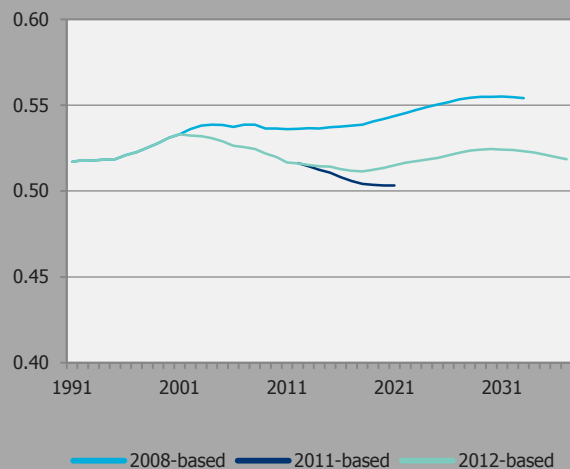
Suppressed Household Formation

The likelihood that a person of a certain age and gender to 'head' a household (household formation rate) is lower in some age groups in the 2012-based household projections compared to previous series. This suggests that the 2012 rates suppress household formation, particularly for younger people aged 25-34 and 35-44 years, in Medway. These are the groups who found it the most difficult to enter the housing market during and after the recession. An adjustment to the 2012 household formation rates in the 25-44 age group is required to address this issue.

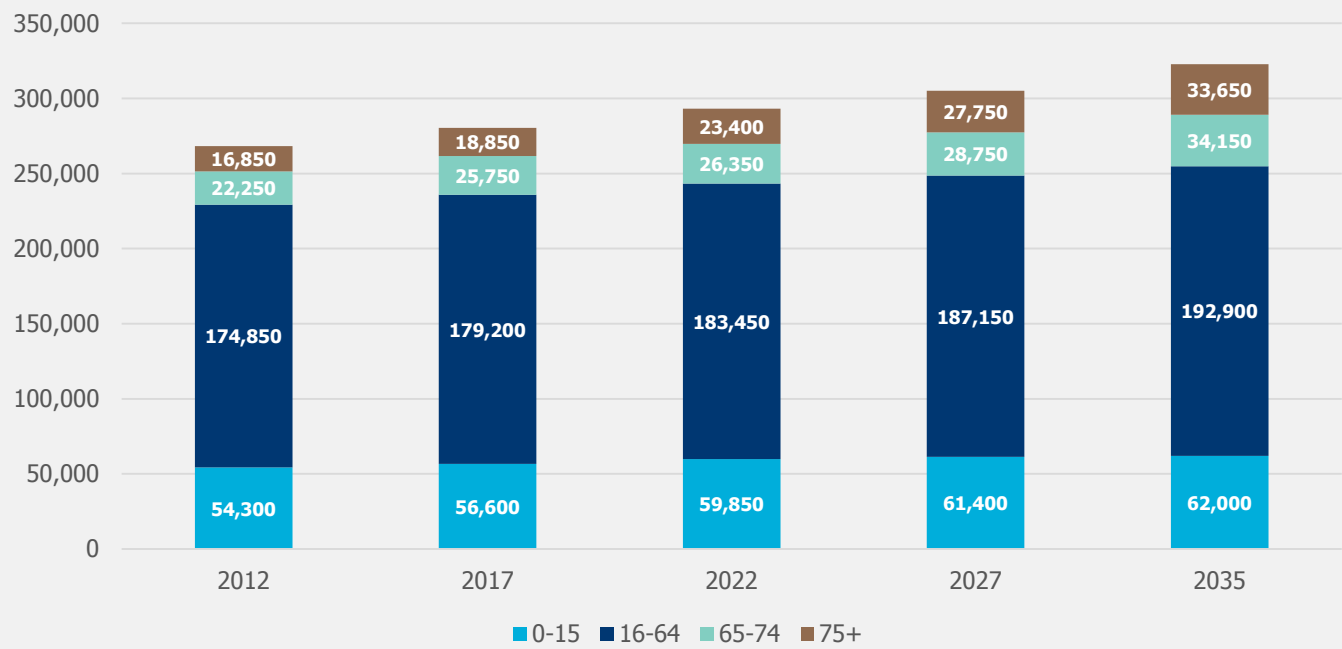
Household Formation Rates: All Ages (15+)



Household Formation Rates: Aged 25-44



ONS 2012-based Population Projections: Medway

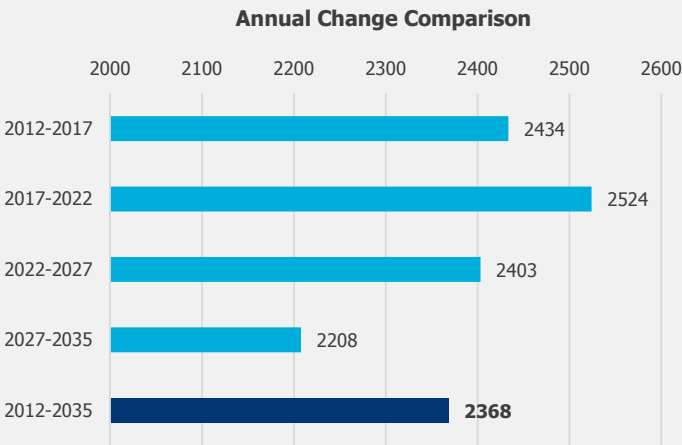


The 2012-based Sub National Population Projections (SNPP) project Medway’s population to increase by an **additional 2,368 people per annum** over the period 2012-2035.

This is broadly comparable to the previous interim 2011-based ONS SNPP (circa 2,500 people per annum, 2011-2021), but significantly higher than the pre-recessionary 2008-based series (circa 1,370 people per annum).

At a national level the 2012-based ONS SNPP are considered a conservative projection, being underpinned by 165,000 net international migrants per annum projected between 2012 and 2037. This compares with over double this assumption (336,000 people per annum) being recorded in the most recent year (ending June 2015).

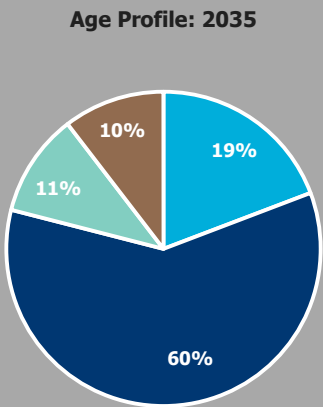
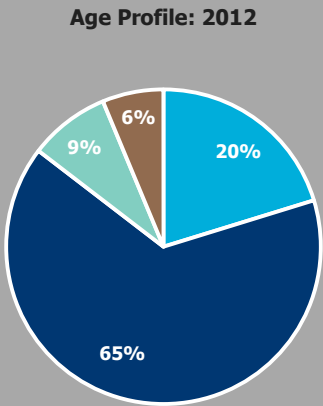
For this reason, flexibility for higher population growth in Medway than projected by the 2012-based ONS SNPP and the 2012-based CLG household projection is required, to ensure a significant underestimate is not assumed. If net-migration trends justify an upward adjustment to the 2012-based ONS SNPP, the PPG makes provision for this (see next slide).



Source: Office for National Statistics (ONS) Sub National Population Projections

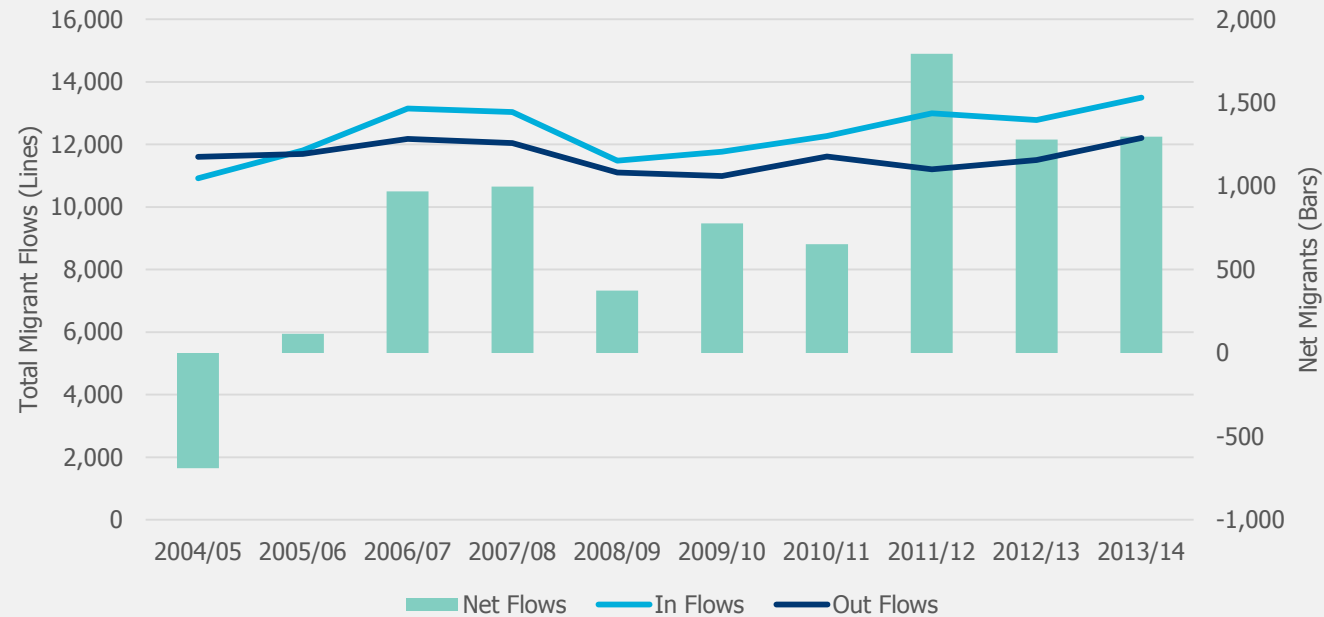
The Ageing Population

Over the Plan Period, the age profile of Medway is projected to change significantly. By 2035, the over 65 population will have increased by 6%. Left unchecked, the relative decline of prime working age (16-64) population will have an adverse effect on future economic competitiveness and productivity.



0-15 16-64 65-74 75+

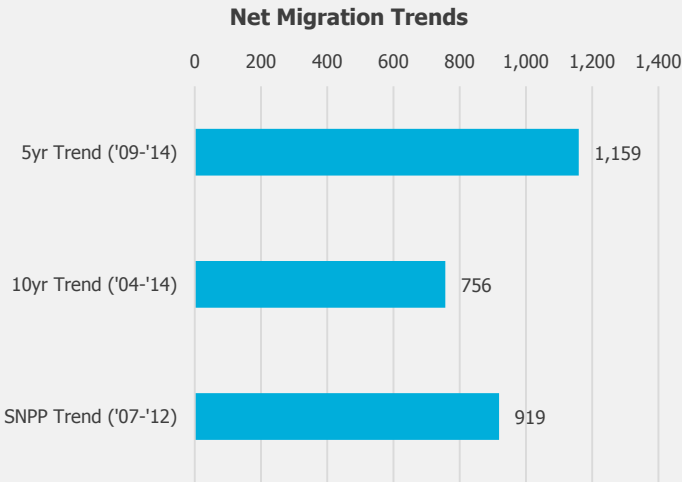
Migration Flows: Medway



Over the past decade there have been higher in flows than out flows of people moving to Medway, resulting in significant net in-migration to the Borough. Net in-migration fell sharply between 2008/09 and 2010/11 following the onset of the recession, but since 2011/12 has increased to between 1,280 and 1,793 people per annum.

Notwithstanding the most recent 5-year (2009-2014) trend incorporating the end of the recessionary period, the average has been for net in-migration of 1,159 people per annum. This exceeds the 10-year trend (756 people per annum) and the trend over the period 2007-2012 (919 people per annum) which underpins the 2012-based SNPP.

Despite net migration increasing significantly in the last three years, it cannot be certain whether this increase will continue. On this basis, it is considered that the 2012-based SNPP provide a reasonable demographic projection for Medway at this point in time but that the projection should be considered a very minimum and that if subsequent data releases show net migration to Medway continually increasing then the demographic assessment should be adjusted to reflect this.

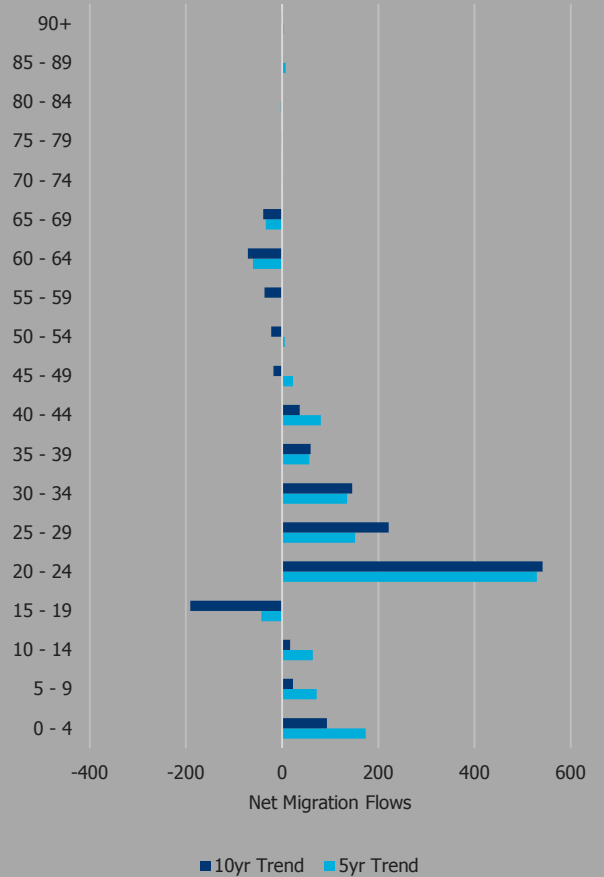


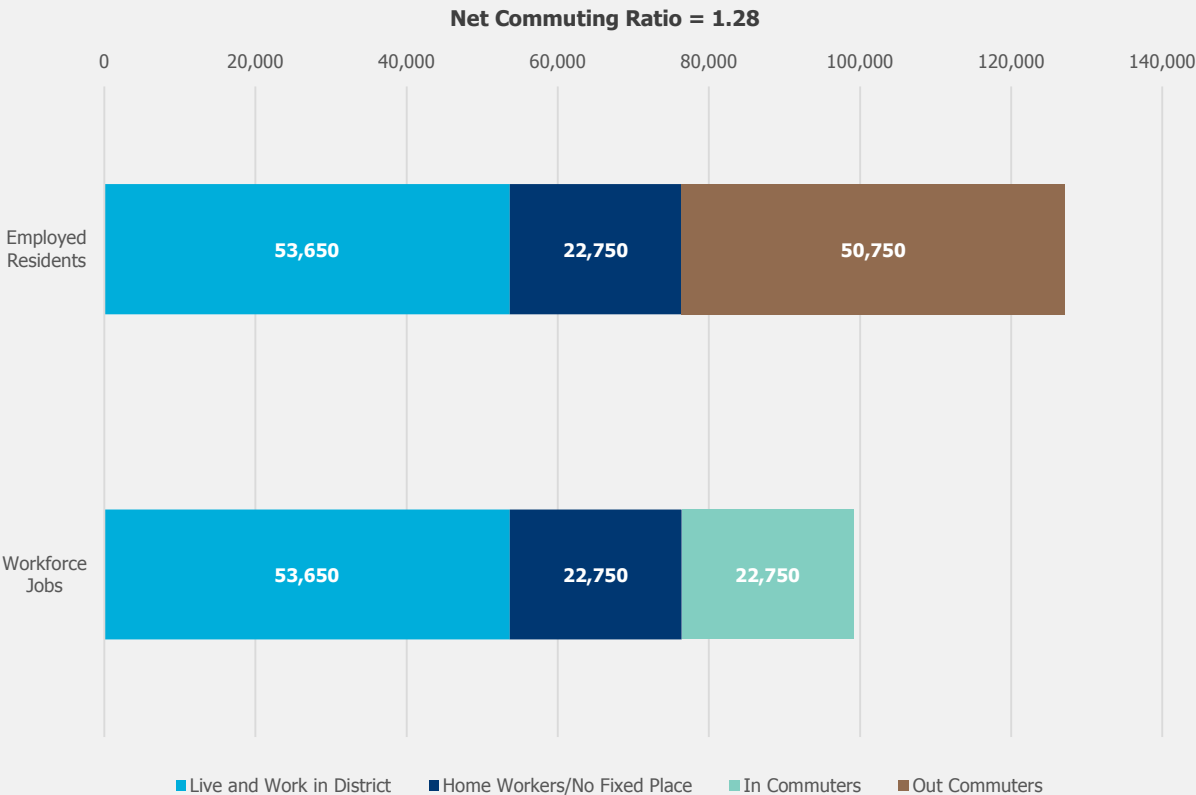
Source: Office for National Statistics (ONS) Components of Population Change

Age Profile of Migrants

Net migrants to Medway tend to be younger families who are of working age. Encouraging net migration will therefore counter the naturally ageing population of Medway. Without net migration the working age population of Medway will fall significantly over the plan period. To support economic growth in Medway the resident labour supply needs to increase to support past trends and forecasts of job growth.

Net Migration by Age Group





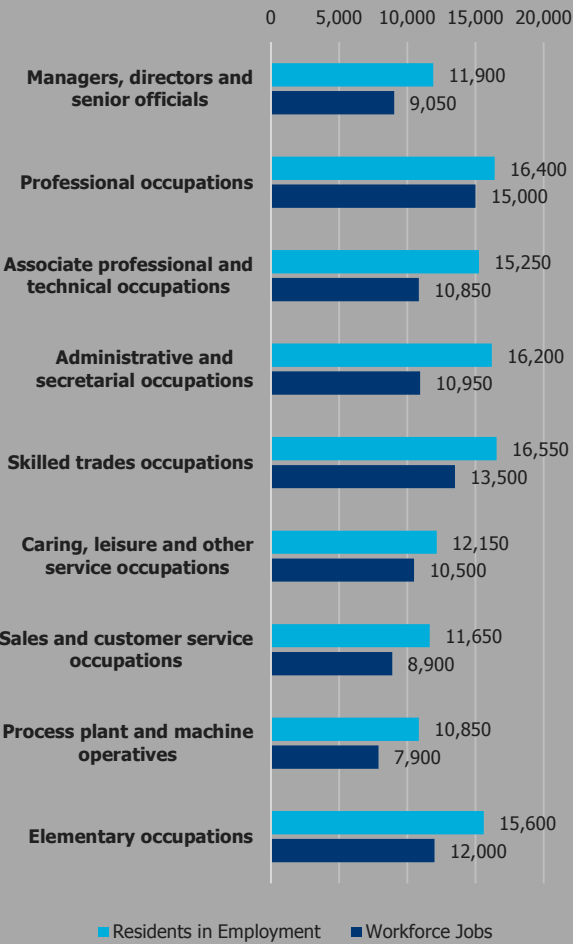
Within Medway there is a greater number of residents in employment compared to the number of jobs which means that Medway exports labour. This results in a commuting ratio of 1.28.

The commuting ratio is of importance in determining the number of people required to move into an area to generate labour force and fill jobs. The commuting ratio may change over the Medway Plan period (2012-2035), and this could require more or less workers. However for the purposes of demographic modelling and objectively assessing need, the commuting ratio is maintained at 2011 Census levels to ensure the objective assessment of need is unconstrained and 'policy off'.

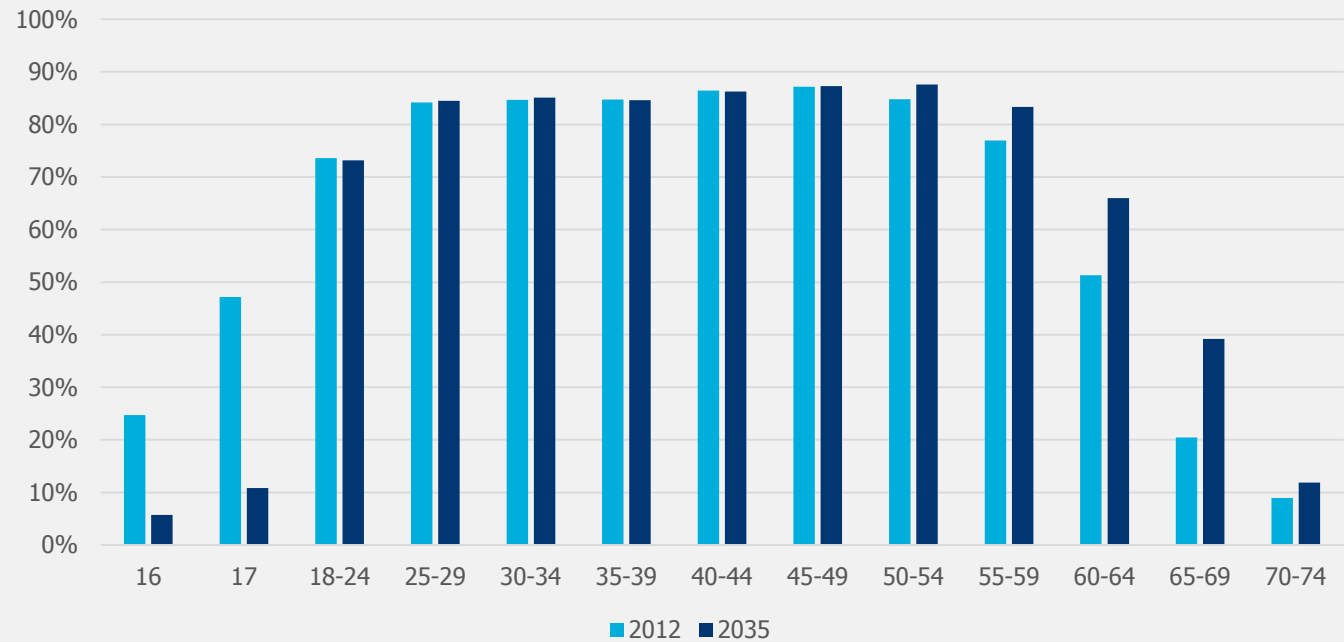
In the case of Medway, for every 100 jobs created, 128 economically active (labour force) people will be required.

Commuter Flows by Occupation

The data in this table shows how there is a net outflow of residents in employment in all occupations in Medway Borough. Professional and skilled occupations employ the largest numbers of people, both within the Borough and outside. Manual occupations employ the lowest numbers.



Economic Activity Rate Projections: Medway



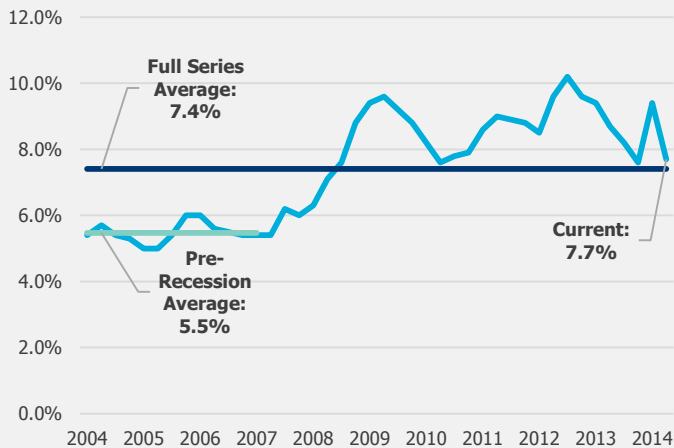
Economic activity rates measure, for a given age and gender band, the proportion of the population who are likely to be available for work.

The extension of State Pension Age (SPA) and the effective abolition of age-related retirement will increase the activity rates among the older age bands. In contrast, the extension of compulsory education to the age of 18 will reduce the activity rates of 16 and 17 year olds.

Activity rates are applied to the population projection to calculate the economically active population (resident labour supply) and therefore even where rates are held constant, an increase in the population will result in an increase in the resident labour supply. The graph above illustrates how the economic activity will increase over the Plan period.

Unemployment rates increased in Medway during the recession. In late 2009 the **unemployment rate peaked at 9.6%**. Barton Willmore's assessment assumes that unemployment will return to the **pre-recession average of 5.5%** by 2021 and remain constant thereafter.

Medway Unemployment Rates - APS

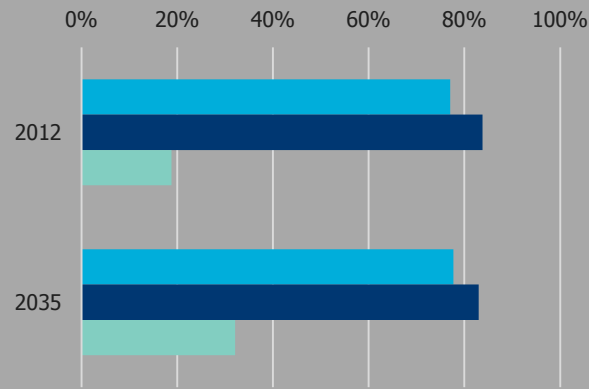


Source: ONS, 2011 Census Economic Activity projected using Kent County Council Activity Rate Forecasts to 2036, November 2014
ONS, Annual Population Survey Model Based Estimates of Unemployment

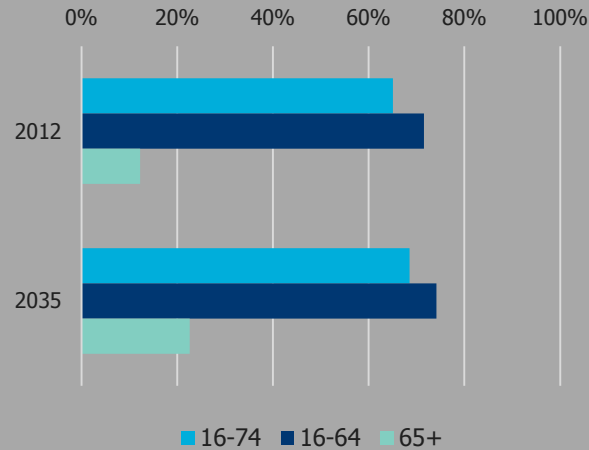
Male and Female Economic Activity

Economic activity rates are generally higher for males than females. However, between 2001 and 2011, female activity rates increased more rapidly than males as a result of increased participation of females in the labour market. Projections assume this pattern will continue. However, female rates are still expected to remain lower than males. The extension and equalisation of male and female SPA will increase future economic activity rates for both males and females aged 65+.

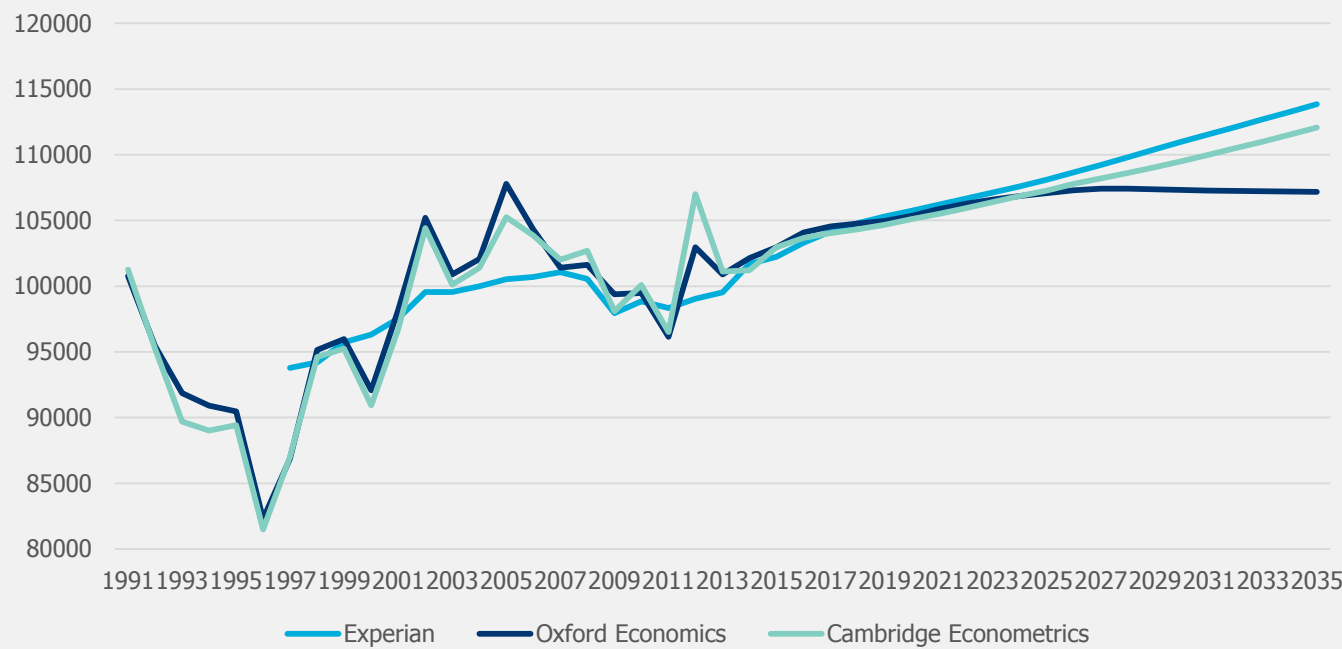
Male activity rate projections



Female activity rate projections



Workforce Job Growth: Medway

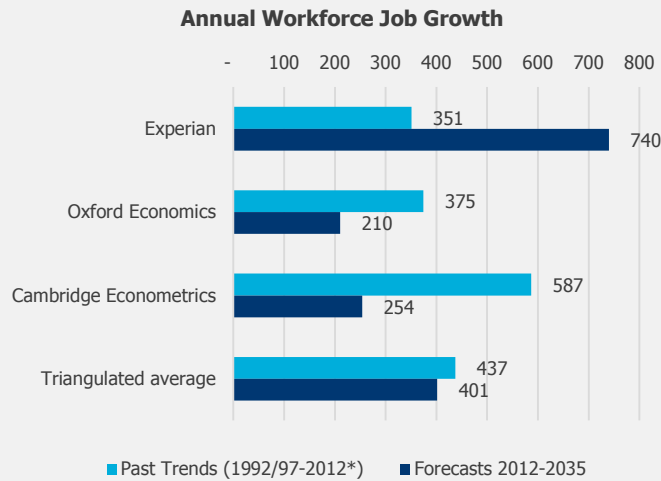


The PPG (paragraph ID2a-018) states how employment forecasts and trends must be taken into account when establishing unconstrained OAN.

In this context Barton Willmore has obtained the most recent job growth forecasts from the leading three forecasting houses (Experian Economics, Cambridge Econometrics, and Oxford Economics). The three sources provide past trends alongside the forecasts for the period being assessed here (2012-2035).

The average forecast job growth for the Plan period is 401 jobs per annum. This follows a broadly similar trajectory to the average past trends recorded by the three forecasting houses (437 jobs per annum, 1992/97-2012).

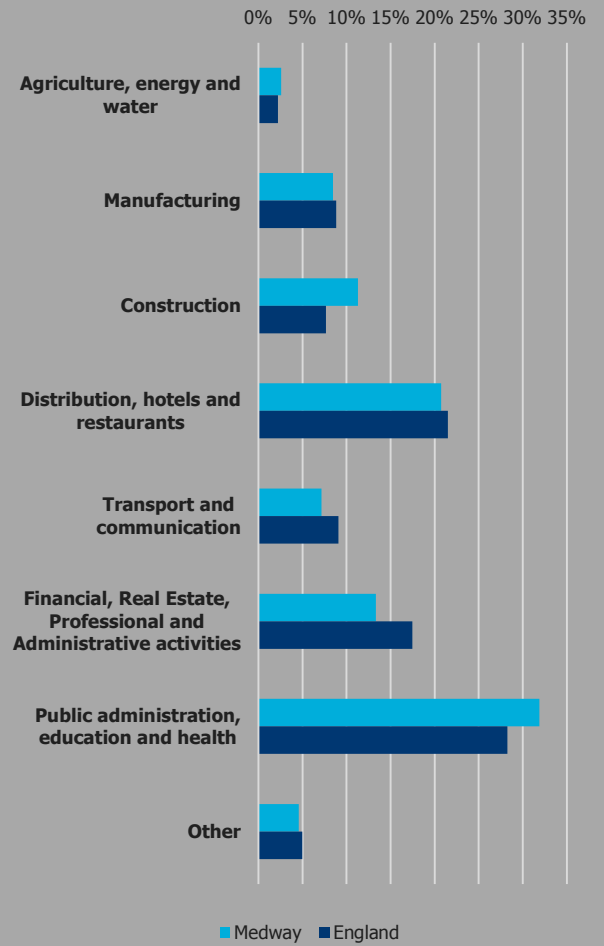
The demographic forecasting undertaken in this assessment therefore establishes the level of housing growth required to support job growth of 401 jobs per annum in Medway.



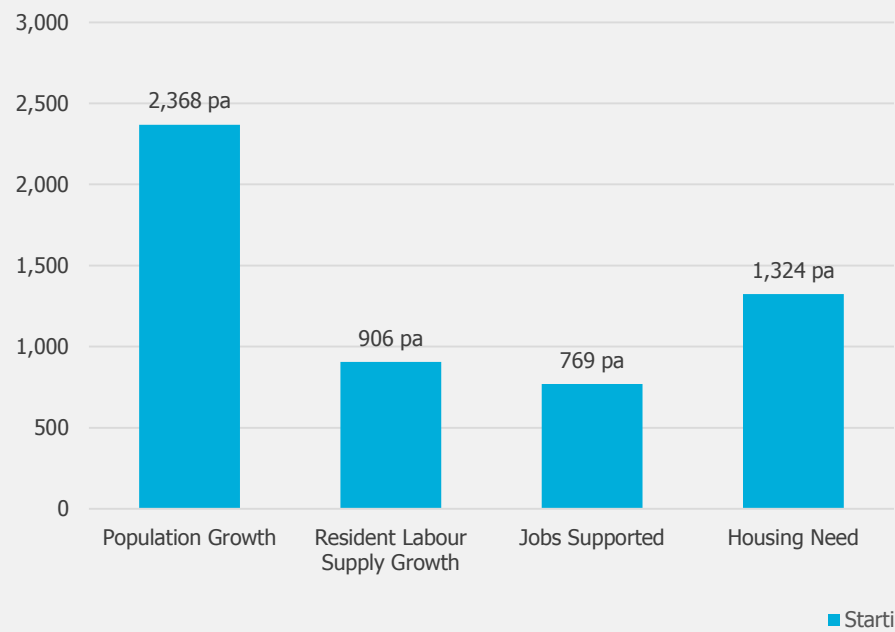
Source: Experian Economics, Oxford Economics, Cambridge Econometrics

Key Industrial Sectors

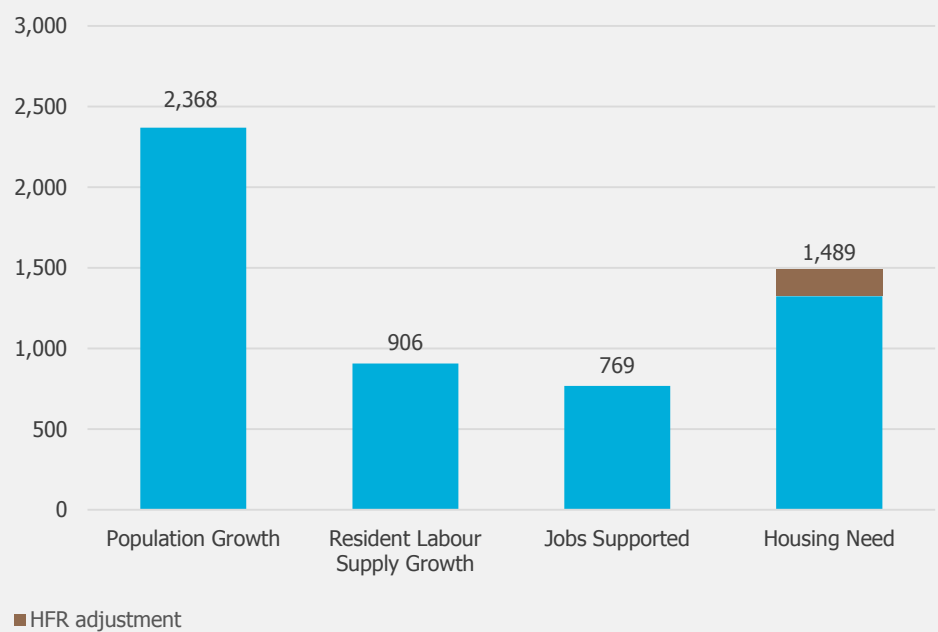
Medway’s employment base is diverse with people who work in Medway working in a wide range of industries. The industrial sector which employs the most people is the Public administration, education and health sector (32%) followed by Distribution, hotels, and restaurants (21%). These two sectors account for over 50%.



Starting Point



Household Formation Adjustment



The PPG’s ‘Starting Point’ scenario is a reflection of the CLG 2012-based Household Projection series, with adjustments made to convert household change into housing need (by applying adjustments for vacant and second homes). In Medway this adjustment rate is 3.3% and the unadjusted dwelling requirement would be **1,324 dpa, 2012-2035**.

This starting point would provide for the policy off average job growth forecast (401 jobs per annum) we set out on page 8.

However this is the **starting point estimate only**. To comply with the requirements of PPG, consideration of the underlying household formation rates and migration assumptions underpinning this starting point need to be considered. Adjustment should then be made if local circumstances dictate.

The starting point estimate of need (1,324 dpa) is considered to be underpinned by suppression in household formation in the 25-44 age group in Medway. PPG ID2a-015 states how sensitivity testing can be undertaken, specific to local circumstances, and in this context an adjustment to the starting point has been made. This complies with the NPPF requirement to ensure Plans are positively prepared.

The above graph shows how a blended approach to household formation rates would alter the OAN starting point. This blended approach is as follows; all ages with the exception of the 25-44 age group are underpinned by the household formation rates of the starting point. However in the 25-44 age group we have applied a return to the pre-recessionary 2008-based household formation rates by the end of the Plan period (2035). This will help to alleviate the clear suppression in household formation in this age group.

This adjustment results in an **increase to 1,489 dpa, 2012-2035**. This is considered to represent full OAN for Medway.

The PPG states how an adjustment to the demographic projection can also be considered. Barton Willmore’s analysis of migration trends has identified that net migration to Medway has increased in the last three years. However, we cannot be certain whether this is a reversal of trend. Until more sufficient data is available, it is considered appropriate to plan on the basis on the 2012-based SNPP. Nonetheless it is considered that the 2012-based SNPP should provide the **very minimum** level of future population growth in Medway given the low international migration assumptions they are underpinned by. However, if subsequent releases of Mid-Year Population Estimates provide evidence that migration to Medway is continuing to increase, then the approach to OAN may require modification.

The affordability ratio measures the ratio between lower quartile house prices and lower quartile earnings. The chart to the right tracks the affordability ratio in Medway between 1999 and 2013 based on a three year rolling average.

Although Medway is lower than the average for the south east region, in 2013 lower quartile house prices remained 6.6 times lower quartile earnings. House prices are therefore unaffordable for most first time buyers.

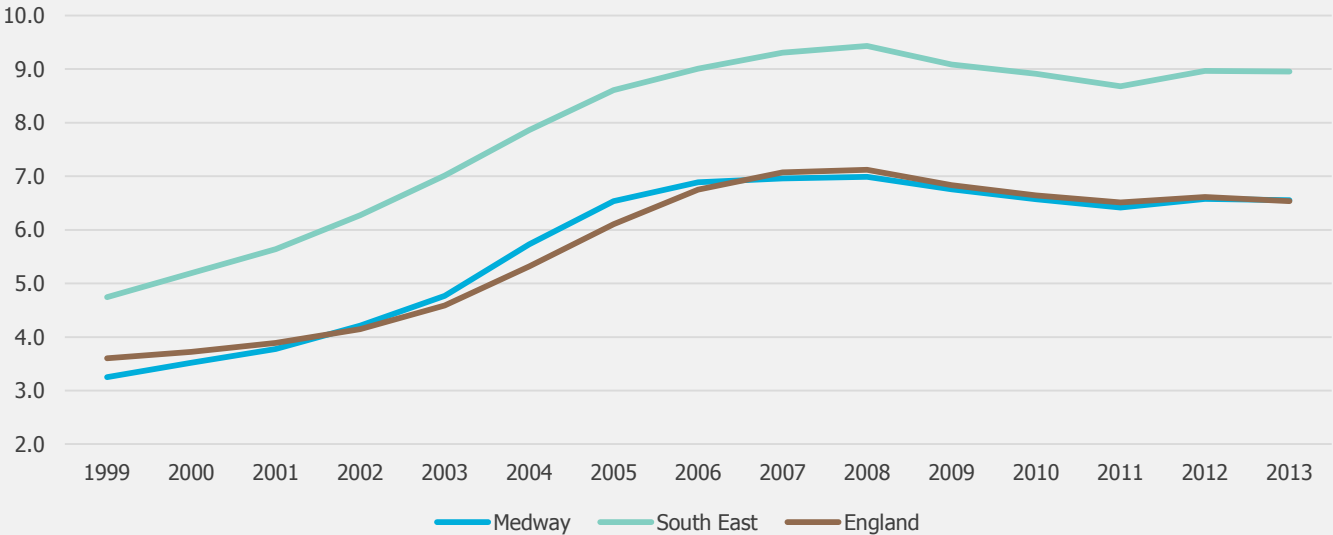
Private housing market entry thresholds indicate that 68% of first time buyers in Medway would not be able to afford a lower quartile house and 59% would not be able to afford lower quartile rents in the Borough.

Affordability is just one of the six market signals that PPG identifies needs consideration when determining housing need, with a worsening trend in any of the indicators providing justification for an adjustment to the housing need number suggested by the household projections.

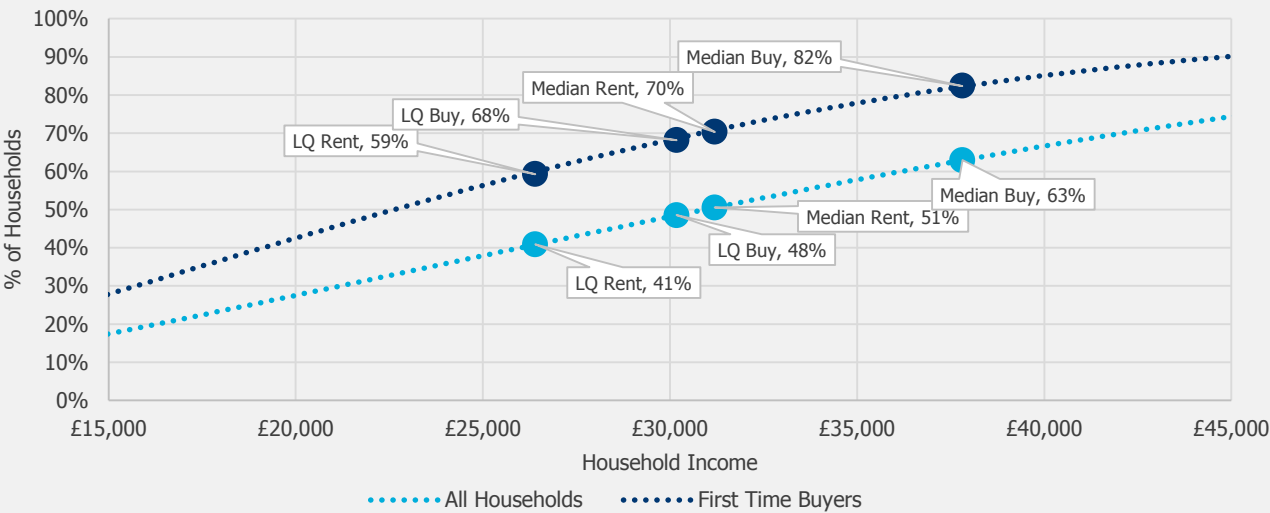
Further consideration of all of the market signals is deemed necessary in order to establish the full extent to which there are market signals issues within Medway, but this evidence suggests an acute affordability problem in Medway.

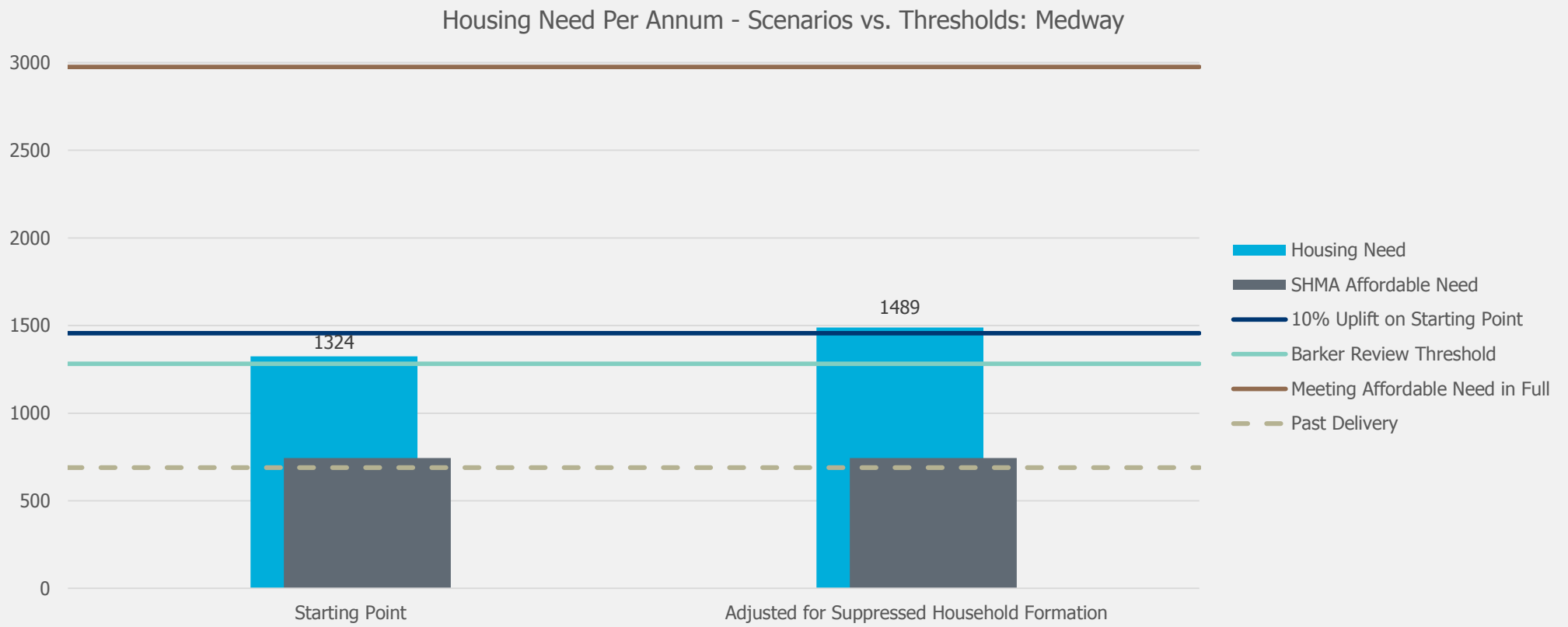
The OAN we propose would help to alleviate worsening affordability in Medway.

Lower Quartile Affordability Ratio: Medway



Private Housing Market Entry Thresholds: Medway





The 'starting point estimate' of housing need in Medway as indicated by the CLG 2012-based household projections is **1,324 dwellings per annum** over the period 2012-2035. If a 10% uplift is applied to the 'starting point' estimate (in line with the 'modest' uplift applied by Inspectors in recent Examinations, for example Eastleigh) to address worsening market signals, then this would bring housing need up to approximately **1,456 dwellings per annum**.

However, the 'starting point estimate' is considered an **underestimate** of future housing need, as it projects suppressed household formation rates in the 25-44 age group over the 23-year Plan period. An adjustment to more positive 2008-based rates of household formation solely in the 25-44 age group shows how the starting point estimate would need to be increased to **1,489 dwellings per annum** to ensure the suppression in the 25-44 age group is alleviated. Planning on the basis of more positive rates of household formation would help to improve affordability for first time buyers and reduce the number of concealed households (such as adult couples living with parents) in this age group.

The 'starting point' adjusted for suppressed household formation would generate the level of economically active population required to meet the average 'policy off' job growth forecast (401 jobs per annum). An upward adjustment for job growth is not considered to be required. However the draft Medway Plan identifies affordable housing need equating to 744 affordable dwellings per annum. The Council's policy is to deliver 25% affordable housing on all major developments. To achieve this, OAN would need to increase to nearly 3,000 dwellings per annum, 2012-2035.

The 2012-based Household Projections indicate a starting point of 1,324 dwellings per annum, including a vacant dwelling adjustment of 3.3%.

The 25-44 age group shows clear signs of suppressed household formation in Medway. A return to pre-recessionary 2008-based household formation rates in this age group by 2035 would increase the starting point estimate to 1,489 dpa, 2012-2035.

Despite net migration to Medway increasing in recent years it is uncertain whether this trend will continue. On this basis, it is considered that the 2012-based SNPP provide an appropriate demographic projection for assessing housing need. However, the level of population growth projected by the 2012-based SNPP should be considered a minimum.

The demographic-led adjustments will result in growth of the economically active (labour force) population that will support the average 'policy-off' job growth forecast (400 jobs per annum). No further adjustment for jobs growth is considered necessary.

The latest evidence from Medway shows affordable housing need of 774 dpa. To meet this in full at provision of 25%, OAN of nearly 3,000 dpa would be required. This is not considered realistic, however we recommend the OAN of 1,489 dpa, which will go some way to meeting some of the significant affordable need.

Full OAN for Medway is considered to be 1,489 dpa, 2012-2035

METHODOLOGY STATEMENT
FOR OBJECTIVELY ASSESSING HOUSING NEED IN
MEDWAY UNITARY AUTHORITY

Project Ref:	20894/A5/DU
Status:	Final
Issue/ Rev:	02
Date:	02/16
Prepared by:	DU
Checked by:	DU
Authorised by:	EW

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Date: February 2016

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1.0 INTRODUCTION

- 1.1 This paper has been produced to accompany the Objectively Assessed Housing Needs (OAN) dashboard for Medway Unitary Authority (MUA). It is intended to provide a more detailed description of the methodology used for assessing OAN.
- 1.2 Chapter 2 of the paper begins with a detailed outline of the national planning policy and guidance on establishing OAN, setting out the methodological approach taken by Barton Willmore.
- 1.3 An overview of the POPGROUP demographic forecasting model is presented in Chapter 3. This is the forecasting tool which has been used by Barton Willmore to undertake sensitivity testing of alternative demographic and household formation assumptions, along with an assessment of the level of housing required to support economic growth.
- 1.4 The data assumptions used within Barton Willmore's assessment of OAN along with their respective sources are presented in Chapter 4.

2.0 OVERVIEW OF OAN METHODOLOGY

- 2.1 The requirement for all Local Planning Authorities (LPAs) to base their housing targets on objective assessments of need is rooted in national planning policy – specifically the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

National Planning Policy Framework (NPPF, 27 March 2012)

- 2.2 NPPF sets out the Government’s planning policies for England and how these are expected to be applied. NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).
- 2.3 In respect of delivering a wide choice of high quality homes, NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).
- 2.4 With regard to plan-making, local planning authorities are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156).
- 2.5 Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of and strategies for housing and employment uses, taking full account of relevant market and economic signals (paragraph 158).
- 2.6 For plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should prepare a Strategic Housing Market Assessment (SHMA) that identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period (paragraph 159).

Planning Practice Guidance (PPG, 06 March 2014)

- 2.7 PPG was issued as a web based resource on 6th March 2014, following the publication of ‘beta’ guidance in 2013. Guidance on the assessment of housing development needs (PPG ID2a) includes the SHMA requirement set out in NPPF and supersedes all previous published SHMA practice guidance (CLG, 2007).

- 2.8 The primary objective of the housing development needs assessment (the SHMA) is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002).
- 2.9 Housing need refers to the scale of housing likely to be needed in the housing market area over the plan period, should cater for the housing demand in the area and identify the scale of housing supply necessary to meet that demand (PPG ID2a 003).
- 2.10 The assessment of need is an objective assessment based on facts and unbiased evidence and constraints should not be applied (PPG ID2a 004).
- 2.11 Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

PPG methodology for assessing housing need

- 2.12 The full methodology is set out at ID 2a 014 to 029 (overall housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

i) Starting point estimate of need

- 2.13 The methodology states that the starting point for assessing overall housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends (ID2a 015).

"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing." (2a-015) (Our emphasis)

ii) Adjusting for demographic evidence

- 2.14 The PPG methodology advises that adjustments to household projection-based estimates of overall housing need should be made on the basis established sources of robust evidence, such as ONS estimates (2a-017).

iii) Adjusting for likely change in job numbers

- 2.15 In addition to taking into account demographic evidence the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems."
(2a-018)

iv) Adjusting for market signals

- 2.16 The final part of the methodology regarding overall housing need is concerned with market signals and their implications for housing supply (2a-019:020).

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." (2a-019)

- 2.17 Assessment of market signals is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards. Particular attention is given to the issue of affordability (2a-020).

"The more significant the affordability constraints ... and the stronger other indicators of high demand ... the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be." (2a-020)

v) Overall housing need

- 2.18 An objective assessment of overall housing need can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.
- 2.19 The extent of any adjustment should be based on the extent to which it passes each test. That is,
- It will at least equal the housing need number implied by the latest demographic evidence,
 - It will at least accommodate projected job demand; and,
 - On reasonable assumptions, it could be expected to improve affordability.
- 2.20 The approach used by Barton Willmore to objectively assess overall housing need follows the methodology set out in PPG 2a-014:20 and summarised above. The result is a policy off assessment of housing need that takes no account of the impact of planned interventions, strategies and policies.

vi) Affordable housing need assessment

- 2.21 The methodology for assessing affordable housing need is set out at 2a-022 to 029 and is largely unchanged from the methodology it supersedes (SHMA 2007). In summary, total affordable need is estimated by subtracting total available stock from total gross need. Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

“The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments ... An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.” (2a-029) (our emphasis)

Barton Willmore Methodological Approach

- 2.22 Barton Willmore's approach to OAN closely follows the approach set out in PPG, and is therefore methodologically robust.

Stage One – Define the Housing Market Area Boundary

- 2.23 Before any assessment can be carried out, the limits of the HMA must be defined. This is vital to ensure that the OAN reflects the social and economic dynamics of the area, and informs discussions on distribution should a particular LPA within the HMA face insurmountable challenges in accommodating its own demand for housing.
- 2.24 As a starting point, research from the Centre for Urban and Regional Development Studies (CURDS) at Newcastle University is consulted, and compared against ONS Travel to Work Areas (most recently produced in 2007 from 2001 Census data – update due in 2015) and HMA definitions applied within recent LPA evidence base studies. These definitions are then tested using commuting and migration flow data (plus data on house prices) to determine which is most appropriate for the purpose of assessing housing need, taking account of guidance set out at PPG ID: 2a-009 to 013. The HMA area as defined and used by the LPAs has also been considered within this assessment.

Stage Two – Identify and Adjust Demographic Starting Point

- 2.25 The CLG 2012-based Household Projections (released in February 2015) act as the starting point for assessing housing need (as established at PPG ID: 2a-015). However, these projections alone do not constitute OAN – several adjustments are required based on further evidence.
- 2.26 The first adjustment made is to account for suppressed household formation inherent in the 2012-based household formation rates. The problem of suppression arises because although formation rate projections are based on a long run trend which takes its bearings from Census points since 1961/71, that trend is distorted by the results of the 2011 Census, taken at a time when formation was greatly constrained by economic factors (supply, affordability and the aftermath of recession). An adjustment therefore needs to be made to the household formation rate assumptions, relative to local circumstances. To do this, a return to the household formation rates assumed in the last pre-recession household projections series can be incorporated into the forecasting model, for specific age groups and by gender, as appropriate.

- 2.27 A further adjustment can also be made to test alternative assumptions of net migration. Again, the recession has had a distorting effect on the movement of people between places, so longer term trends can provide a more robust guide of likely migration patterns in the future. However the short-term trend (past 5 years) can be justified.

Stage Three – Assess Labour Force Capacity

- 2.28 To identify the extent to which forecast labour demand will be accommodated by the OAN following the approach described above, a comparison is made between the size of the workforce arising from the adjusted demographic-led modelling, and job creation forecasts, taking into account 'policy-off' average job growth trends forecasts from three sources; Experian Economics, Cambridge Econometrics, and Oxford Economics; and potential changes in unemployment and economic activity rates over the plan period. The ratio of residents in employment and workforce jobs (the commuting ratio) is also an important input into this process.
- 2.29 If the size of the resulting workforce is less than the forecast number of jobs, it is likely that a further uplift in the dwelling target would be required. Should this occur, additional jobs-led modelling is carried out to identify the population growth (and therefore number of dwellings) required to supply sufficient labour capacity.

Stage Four - Assess Market Signals

- 2.30 Housing costs in all parts of the country are less affordable now than 20 years ago, largely due to a significant decline in the number of homes being built. The extent to which this breakdown between the supply of and demand for housing occurs within the subject HMA is observed through an analysis of Market Signals.
- 2.31 Several key Market Signals are assessed including House Prices, Private Rents, Affordability, Concealed and Overcrowded Households and Completion Rates. As stipulated at PPG ID: 2a-020, a worsening trend in any of these indicators requires a boost to the planned level of housing supply.

Stage Five – Bringing the Evidence Together

- 2.32 Overall housing need is identified by distilling the analyses discussed above into a single OAN for the period 2012-2035. This figure, by definition, does not take into account policy considerations which may place constraints on supply or limit the deliverability of housing. Housing need figures are provided for the relevant individual LPAs, but distribution of the

overall HMA OAN will in practice be subject to agreements between LPAs being made, including any constraints in particular areas.

Stage Six – Affordable Housing Need

- 2.33 The extent to which the OAN arrived at through the previous stages would meet affordable need is also assessed. Where the local authority SHMA has provided a recent and detailed account of affordable need which draws on primary research, this is used as the basis for much of the analysis. Where an LPA has not undertaken an affordable housing need assessment, an indication of what the requirement would be to meet the LPAs affordable policy is provided.

Chapter Summary

- 2.34 The approach of national policy and guidance clearly states the importance of objectivity and transparency in the assessment of housing requirements. This study has been prepared in accordance with this approach, and uses data and methodologies (where possible) which can be traced and replicated. The ultimate output of this study is a clear, unambiguous recommendation for housing development which is supported by a robust evidence base and sound assumptions.

3.0 POPGROUP AND DEMOGRAPHIC FORECASTING MODEL

3.1 The POPGROUP and Derived Forecast (DF) model is a well-established demographic model developed to forecast population, households and the labour force for specified geographical areas. POPGROUP has over 90 users, including academic and public service staff in housing, planning, health, policy, research, economic development and social services. It is the industry standard in the UK for demographic analysis within strategic planning. More information about POPGROUP can be found at <http://www.ccsr.ac.uk/popgroup/index.html>

3.2 The main POPGROUP model uses standard demographic methods of cohort component modelling that enables the development of population forecasts based on births, deaths and migration inputs and assumptions. In summary, this methodology adopts the following approach:

- take a base population by single year of age and gender;
- add births and 'in' migration (by age and gender) for year 1;
- subtract deaths and 'out' migration (by age and gender) for year 1;
- age the entire population by one year;
- results for year 1 can be noted;
- repeat the process above for each subsequent year of the forecast

3.3 The POPGROUP model can be used in conjunction with the DF model to produce household and labour force projections and subsequently to use housing and jobs as additional assumptions and constraints in further population projections.

3.4 Importantly the POPGROUP Model provides:

- independent projections that do not rely on other commercial forecasts;
- the ability to replicate Central Government population and household projections;
- the ability to run alternative 'what if' scenarios;
- flexibility to change data assumptions;
- a systematic, rigorous and transparent method so that results are easily traced back to assumptions;
- considerable disaggregation (e.g. annual forecasts, by single year of age and household types by age of 'head of household' for example)

- 3.5 In order to assess OAN, firstly the Central Government 2012-based population and household projections are re-produced within the POPGROUP model. This enables the starting point estimate of need to be determined according to PPG.
- 3.6 The POPGROUP model is then used to undertake a series of sensitivity tests by changing a number of input assumptions. The model assumptions that can be changed by the user are:
- starting population (by age and gender);
 - fertility rates (by age);
 - mortality rates (by age and gender);
 - household assumptions (vacancy rates, proportion second homes);
 - household representative rates (proportion of population, by age, gender and marital status, that are head of household);
 - in-migration profile (by age and gender and whether a migrant originates from elsewhere within the UK or from overseas);
 - out-migration profile (by age and gender and whether a migrant emigrates to elsewhere within the UK or overseas);
 - phasing of dwellings.
- 3.7 The first sensitivity test that is undertaken is to test the impact of alternative household formation rates in comparison to the rates used by CLG to produce the most recent 2012-based household projections. Household formation rates indicate the likelihood of a person to form a notional head of household. Household formation rates (by age and gender) are applied to the generated population forecast in order to indicate the future number of households and by analysing change over time can be used to indicate a future housing need requirement once an adjustment has been applied to take account of vacancy and second homes. This sensitivity test models the impact of applying a gradual full return to the 2008-based household formation rates for 25-34 year olds by 2035.
- 3.8 The second sensitivity test modelled within POPGROUP is to apply alternative migration trends in comparison to those used to produce the 2012-based Sub National Population Projections (SNPP). The 2012-based SNPP draw trends from the five-year period 2007-2012; a period reflecting deep economic recession which in some places resulted in atypical migration patterns.
- 3.9 The 2012-based ONS SNPP for Medway assumes net in-migration to Medway of 840 people per annum, 2012-2035. This is based on trends drawn from the period 2007-2012. Analysis of net migration over this period indicates net migration of 941 people per annum over this period

which is lower than average net migration of 1,159 people per annum drawn from a more recent 5-year period (2009-2014). Despite net migration to Medway increasing in recent years, it is uncertain whether this trend will continue. For this reason Barton Willmore consider the 2012-based SNPP to provide a reasonable demographic projection for Medway at this point in time. However, our approach may be adjusted in light of new evidence (for example, if the release of subsequent Mid-Year Population Estimates illustrates net migration to Medway continuing to increase).

- 3.10 In light of this, no alternative migration trends are presented for Medway. However, if they were, our approach to modelling alternative migration trends is outlined below.
- 3.9 There are two different ways to approach the consideration of alternative migration trends:
- The counts approach is based on the average net migrant count per year, by age and gender, for each migration flow (in and out) over a given period;
 - The rates approach is based on the average migrant count per year divided by the reference population, by age and gender for each migration flow over a given period. The reference population is taken to be UK population minus district population for in flows and district population for out flows.
- 3.10 Each approach will lead to slightly different results. For example, a 5-year trend of counts will result in a different population projection to one based on a 5-year trend of rates, yet both are reflective of a short-term (5-year) trend. No approach is right or wrong. However, a counts approach uses a fixed number of total migrants in each year of the projection period. In reality, this is unlikely to happen and migration counts will fluctuate. A rates based approach applies the past trend of age and gender specific migration rates to the changing demographic profile and as a result the number of migrants in each year of the projection period will be different.
- 3.11 Our preference is to use the rates based approach as in addition to reflecting past trends, it responds to the changing demographic profile, providing in our opinion, a more robust assessment. Furthermore this is the approach used by ONS to produce the Sub National Population Projections.
- 3.12 Model outputs from the sensitivity tests provide an indication of the resident labour supply that would be generated from the given scenario and by applying assumptions regarding unemployment and economic activity this can be used to determine the number of jobs that could be supported. This enables a conclusion to be reached as to whether the demographic-led assessment of need would support job growth in line with past trends and economic

forecasts. If it is determined that the demographic-led assessment of need would not support economic growth in line with past trends and economic forecasts, the POPGROUP model is then used to determine what level of housing would be required to support such economic growth.

- 3.13 The POPGROUP model is used to produce a population forecast constrained to an annual job growth target as indicated by past trends and/ or economic forecasts. In a job-led forecast the POPGROUP model calculates the required population and dwelling growth needed to support the future job target. In this type of forecast the model forecasts the population through the cohort component methodology but increases (or decreases) the population accordingly to meet the set job target by altering migration levels.
- 3.14 The POPGROUP model contains data specifically relating to the local authority under consideration in order to reflect the socio-demographic profile of the study area. The data assumptions and sources used to produce the Medway Unitary Authority forecasts are presented in the next section.

4.0 DATA SOURCES AND ASSUMPTIONS

- 4.1 The data assumptions and sources that have been used in the POPGROUP model to produce the OAN for Medway Borough are presented in Table 4.1.

Table 4.1: POPGROUP modelling assumptions

Variable	Data set	Source
Base population	2012 Mid-Year Population Estimates by single year of age and gender are used as the base population.	Office for National Statistics (ONS)
Fertility rate	Age specific fertility rates	ONS 2012-based Sub National Population Projections
Mortality rate	Age standardised mortality ratios by gender	ONS 2012-based Sub National Population Projections
Migrant profile	Age and gender specific migration rates broken down by in-migrants from overseas, in migrants from elsewhere within the UK, out-migrants to overseas, out-migrants to elsewhere in the UK	ONS 2012-based Sub National Population Projections.
Communal establishment population	Age and gender counts of people living in communal establishments. For ages 75+ proportions rather than counts are used to reflect the ageing population.	CLG 2012-based household projections
Household representative rates	Household representative rates by age and gender	CLG 2012-based household projections (Stage One) with sensitivity testing a full return to 2008-based rates by 2035 for those aged 25-44 years
Vacancy/ Sharing/ Second home rate	Proportion of dwellings vacant and second homes (3.3% in Medway).	2014 Council Tax Base and Live Table 125/615 (CLG)

Commuting ratio	Ratio based on residents in employment divided by workplace jobs (1.28 in Medway).	2011 Census Travel to Work Statistics (Table WJ01UK), ONS
Unemployment rate	APS model-based 2011 estimates falling to average rate between 2004 and 2007 by 2021 and then held constant (9.6% in 2011 falling to 5.5% in 2021).	Annual Population Survey (APS), ONS
Economic activity rates	Economic activity rates by age and gender are applied to the resident population to calculate resident labour force	2011 Census (ONS) and projected following Kent County Council (KCC) November 2014 methodology to take account of changes in retirement age (brief summary outlined below)

Projecting economic activity rates

- 4.2 Projecting economic activity rates has followed the Kent County Council methodology. This is a reasonable approach as it is the only contemporary research that we know of that seeks to predict what might happen to activity rates in the future, taking account of changes to the state pension age and trends in participation including working into old age. Economic activity rates have been calculated using 2011 Census data. Rates for 16 and 17 year olds have been calculated separately to model the impact of the extension of state education to 18 years of age by 2015. The expected impact of which is to slightly reduce economic activity of 16 and 17 year olds post 2015 (although account is taken of the fact that some will still have part-time jobs).
- 4.3 Economic activity rates for the remainder of the population are calculated by 5-year age group. Rates are projected to 2020 following the rate of change projected in the last set of national activity rate projections (2006). Post 2020 rates are held constant for all age groups falling between ages 18 to 49 years. For all age groups over 50 years, activity rates are increased to take account of the extension to State Pension Age and the effective abolition of age-related retirement.

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Organisation

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On Behalf Of

Taylor Wimpey south East

Type of Consultee

Developer/Consultant

MEDWAY COUNCIL LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2012 – 2035

RESPONSE TO PUBLIC CONSULTATION
ON BEHALF OF
TAYLOR WIMPEY STRATEGIC LAND

February 2016

**MEDWAY COUNCIL LOCAL PLAN
ISSUES AND OPTIONS CONSULTATION 2012 – 2035**

RESPONSE TO PUBLIC CONSULTATION

**ON BEHALF OF
TAYLOR WIMPEY STRATEGIC LAND**

FEBRUARY 2016

Project Reference:	20894/A5
Status:	FINAL
Issue/Revision:	03
Date:	29 February 2016
Prepared By:	Emma Wreathall
Checked By:	Richard Jones/ Huw Edwards
Authorised By:	Huw Edwards

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Ref: 20894/A5/EW/RJ/kf/djg
Date: 29 February 2016

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APPENDICES

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1.0 INTRODUCTION

i) Purpose of These Representations

- 1.1 These representations have been prepared on behalf of Taylor Wimpey Strategic Land and sets out comments in response to Medway Council's (MC) Local Plan Issues and Options Consultation (LPIO, January/February 2016). Taylor Wimpey Strategic Land has land interest in a site known as 'Land West of Hoo St Werburgh' (hereafter referred to as 'the Site') (**Appendix A:** Site Location Plan).
- 1.2 In November 2014, an Outline planning application was submitted to MC for the Site for a mixed-use development, including the erection of up to 475 dwellings including affordable housing (Use Class C3), up to 200sqm of commercial floorspace (Use Classes A1/A3/A5) and up to 200sqm sports pavilion (Use Class D2).
- 1.3 The Outline planning application was subsequently refused by MC's Planning Committee on 01 April 2015, for 2no. Reasons for Refusal. The application is now subject to a pending S78 Appeal (APP/A2280/W/15/3132141), lodged on 07 August 2015, and is due to be heard by Public Inquiry in August 2016.
- 1.4 Further detail on the Site and the development proposals are contained in Section 13.0 of these representations.
- 1.5 Notwithstanding our Client's specific land interest, these representations have been prepared in objective terms and in the light of the prevailing planning policy framework – in particular the Government's guidance set out in the National Planning Policy Framework (NPPF) (March 2012), National Planning Policy Guidance (PPG) (March 2014) and the Consultation on Proposed Change to National Planning Policy (December 2015).

ii) Purpose of the LPIO

- 1.6 The LPIO document advises that the current consultation is in advance of the preparation of a new Local Plan, and therefore is not a formal Regulation stage under the Town and Country Planning (Local Planning) Regulations 2012 ('the Local Planning Regulations'). The Local Development Scheme 2015-2018 (November 2015) anticipates that a "Preferred Options" consultation will be undertaken in January to February 2017, forming the first formal stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations).

- 1.7 The LPIO (January/February 2016) sets out the key contextual matters for the Local Plan, for which the increasing population in Medway is considered to be most central. In total there are 22no. matters in the LPIO document, and a number of questions posed.
- 1.8 In addition, the LPIO considers a number of potential approaches that could be taken to form a development strategy for a new Local Plan, based on identified development principles (LPIO, para 27.8). The potential approaches include:
- High density town centre and riverside development;
 - Incremental suburban development;
 - Planning growth of existing settlements;
 - Freestanding settlements;
 - Urban extensions;
 - Role of custom and self-build housing; and
 - Chatham Town Centre.
- 1.9 Whilst the consultation is welcomed, it should be recognised that the LPIO does not contain any detailed policies or identify specific development sites (excluding reference to the unknown outcome of Lodge Hill) that can be assessed, and therefore due to the “broad” nature of the questions posed, the benefit of the consultation responses to MC will be limited in this regard.
- 1.10 The LPIO consultation has not been accompanied by a suite of Evidence base documents that should inform the production of a new Local Plan. Indeed, the Strategic Housing and Economic Needs Assessment (SHENA), the only Evidence Base document due for publication alongside the LPIO consultation (in January 2016), was not made publicly available until 19 February 2016, i.e. 6-weeks from the start of the consultation period, and 1 week from its close. This is disappointing.

iii) Content of Representations

- 1.11 The LPIO, and the strategy for the preparation of a new Local Plan, has been assessed on the basis of National policies as set out in Section 2.0. These representations are structured as follows and provide a response to the following matters/questions:
- Section 2.0 – National Policy
 - Section 3.0 – Housing/Questions 4, 5 & 6
 - Section 4.0 – Environment/Questions 30 & 32
 - Section 5.0 – Built Environment/Question 36

- Section 6.0 – Rural Issues/Questions 38 & 41
- Section 7.0 – Open Space/Question 52
- Section 8.0 – Sports Facilities/Question 54
- Section 9.0 – Agricultural Land/Question 56
- Section 10.0 – Transport/Question 72
- Section 11.0 – Deliverability/Question 77
- Section 12.0 – Development Strategy/Question 82

1.12 In summary, these representations set out the following comments:

- The North Kent SHENA identifies Objectively Assessed Needs (OAN) for Medway as being 1,281 dwellings per annum (dpa) over the period 2012-2037 does not represent the full OAN for Medway over the Plan period (2012-2035);
- The full OAN for Medway is 1,489 dpa in 2012-2035. This would need to be increased to 3,000 dpa for 2012-2035 to achieve the 744 affordable dwellings per annum identified in the North Kent SHENA;
- Development on the Hoo Peninsula needs to be given consideration for the new Local Plan, irrespective of the outcome of Lodge Hill, and particularly given Medway's identified full OAN figure;
- In accordance with National policy, 'Land West of Hoo St Werburgh' should be allocated for mixed-use residential-led development as a sustainable development that can contribute to meeting the housing needs of Medway Council and the wider HMA.

2.0 NATIONAL POLICY

i) National Policy and Plan Making

- 2.1 The National Planning Policy Framework (NPPF) was published in March 2012. In general terms, the NPPF advocates a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development.
- 2.2 The NPPF (para 182) requires that, *"A local planning authority should submit a plan for examination which it considers is "sound" – namely that is":*
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 2.3 Paragraph 156 of the NPPF states that LPAs should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- The homes and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - The provision of health, security, community and cultural infrastructure and other local facilities; and
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.4 Paragraph 157 advocates that crucially Local Plans should:

- Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- Be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- Be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- Identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- Identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- Contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals (para 158).

2.6 The NPPF directs LPAs to prepare an evidence base which indicates that objectively assessed needs for market and affordable housing are met. LPAs should plan for a housing mix which takes into account “housing demand and the scale of housing supply necessary to meet this demand.” Household and population projections should also be a key consideration, taking into account of migration and demographic change (para 159).

ii) National Policy and Housing Need

2.7 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, ‘Objectively Assessed Needs’ (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework,

including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.

- 2.8 LPAs must plan for a mix of housing that *"meets housing and population projections, taking account of migration and demographic change"* (para 159). Significant weight should also be placed on the need to support economic growth through the planning system (para 19).
- 2.9 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

(Reference ID: 2a-015-20140306)

- 2.10 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

- 2.11 The NPPF consultation (CLG, December 2015) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

iii) Duty to Co-Operate

- 2.12 The 'Duty to Co-operate' as provided for in Section 110 of the Localism Act 2011, came into effect on 15 November 2011. The Duty was introduced under the 2011 Act to address the impact of the loss of the "top-down" effect from the Regional Spatial Strategy (The South East Plan) and to offer a transparent way in which authorities should relate to one another on cross boundary issues. The Duty is now shared between authorities requiring them to collaborate on cross-boundary matters and issues of sub-regional and regional importance, especially housing provision and related infrastructure issues.

- 2.13 Section 33A(2)(a) requires that local authorities “engage constructively, actively and on an ongoing basis” in the plan-making process. The NPPF refers to the ‘Duty to Co-operate’ in paragraphs 157 and 178-181. Crucially, paragraph 157 of the NPPF states that *“Local plans should be based on cooperation with neighbouring authorities...”*.
- 2.14 Paragraphs 178-181 are clear in directing LPAs as to the importance of the ‘Duty to Co-operate’ and the proactive approach necessary to ensure a collaborative approach to reflect individual Local Plans. Paragraph 179 states *“joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework”*.
- 2.15 Paragraph 182, as above, provides that an Inspector should assess *“whether the plan has been prepared in accordance with the Duty to Cooperate”* such that compliance with the Duty must also be reflected in the assessment of soundness.
- 2.16 In addition, in March 2014 the CLG published the PPG, to “reflect and support” the NPPF. The PPG contains considerable guidance on the Duty to Co-operate. This is largely due to the fact that the Duty to Co-operate has proved to be a contentious part of the NPPF, with numerous Local Plans being scrutinised at examination due to failure to fulfil the Duty.
- 2.17 The guidance emphasises the importance for LPAs to work together; stressing that *“Cooperation between local planning authorities, county councils and other public bodies should produce effective policies on strategic cross boundary matters. Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local planning authorities have approached others”* (Reference ID: 9-010-20140306).
- 2.18 The PPG also states that LPAs must *“engage constructively, actively and on an ongoing basis to maximise the effectiveness of the plan-making process”* (Reference ID: 9-001-20140306). The ultimate outcome of the engagement should be the production of effective policies on cross boundary strategic matters.
- 2.19 In summary, there are two aspects to the ‘Duty to Co-operate’:
- ‘Duty to Co-operate’ – the s33A legal test is a ‘process’ preparation test. The Duty is incapable of modification at an Examination. Therefore, this is one of the first things that has to be examined because, if the legal requirement is not met, then the Inspector must recommend non adoption of the Plan;

- Collaborative Joint Working – an aspect of soundness. It is primarily concerned with the 'positively prepared' and 'effectiveness' soundness test set out in paragraph 182 of the NPPF. This relates to outcome rather than process.

2.20 The 'Duty to Co-operate' between LPAs is a clear requirement of national planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in paragraph 156 (para 178).

2.21 In addition, paragraph 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged (para 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate' during the plan-making process (para 181).

3.0 HOUSING

Question 4 – Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

- 3.1 We do not consider that the approach and conclusions in assessing the housing need for Medway over the Plan period have been appropriately assessed. We do not consider that the housing need, as calculated by MC, is “sound” and in line with National policy.
- 3.2 The NPPF directs LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and identify the scale, mix and range of tenures that the local population is likely to meet over the Plan period. In addition, LPAs should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land (NPPF, para 159).

i) Medway Council OAN Work

- 3.3 MC has jointly produced a North Kent SHENA with Gravesham Borough Council, comprising a Baseline Report (March 2015) and SHMA (November 2015).
- 3.4 The North Kent SHENA identifies OAN for Medway as being 1,281 dpa over the period 2012-2037 based on the result of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates. This level of housing need has been taken forward in the LPIO (January/February 2016) to represent over the period 2012-2035.
- 3.5 Barton Willmore Research has undertaken a critique of the OAN of 1,281 dpa (**Appendix B**) and does not consider it to represent full OAN for Medway over the Plan period (2012-2035) for the following reasons:
- There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dpa, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The North Kent SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are ‘positively prepared’ an upward

adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;

- The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;
- The North Kent SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined (**Appendix B**) is considered inappropriate;
- The North Kent SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However, we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The North Kent SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The North Kent SHENA and LPIO (January/February 2016) identify significant affordable housing need (744 affordable dpa, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court Judgments confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the North Kent SHENA does not address the significant affordable housing need in Medway.

ii) **Barton Willmore OAN Work**

- 3.6 Given the fundamental flaws identified in MC's own OAN assessment, as above, BW Research has undertaken an assessment of MC's full OAN figure. The Report is contained at **Appendix C** and an overview is provided below.

3.7 The Report has been prepared in accordance with the requirements of the NPPF to ensure that the Local Plan meets the full OAN for market and affordable housing in the HMA. The report identifies that:

- The 2012-based household projection series, with adjustment rate of 3.3% to take account of vacant and second homes, equates to an unadjusted dwelling requirement of **1,324 dpa in 2012-2035**. In accordance with the PPG, this should only be regarded as the 'starting point estimate';
- If a 10% uplift is applied to the 'starting point' estimate (in line with the 'modest uplift applied by Inspector in recent Examination e.g. Eastleigh) to address worsening market signals, then this would bring housing need up to approximately **1,456 dpa in 2012-2035**;
- The 'starting point estimate' is considered an underestimate of future housing need as its projects suppressed household formation rates in the 25-44 age group over the Plan period. When undertaking sensitivity testing specific to local circumstances to alleviate the suppression in this age group, the starting point estimate would need to be increased to **1,489 dpa in 2012-2035**;
- To achieve 744 affordable dwellings per annum identified in the North Kent SHMA (November 2015), based on the 2.5% affordable housing provision, the housing requirement would need to be close to **3,000 dpa for the Plan period (2012-2035)**.

3.8 It is considered that the figure of 1,489 dpa for the Plan period would represent the full OAN for Medway, in order to take account of the latest ONS population projections in accordance with the PPG (Reference ID: 2a-017-20140306).

3.9 Overall, it is considered that the LPIO (January/February 2016) does not seek to meet the full and correct OAN for Medway. This matter should be addressed before the next iteration of the Local Plan as the current position is "unsound".

iii) Under Delivery of Housing

3.10 The Consultation on Proposed Changes to National Planning Policy (CPCNPP) (December 2015) indicates that CLG are intending to amend National planning policy to ensure appropriate action is taken where there is a significant shortfall between the homes provided for in Local Plans and the houses being constructed. A housing delivery test is proposed (as outlined in the Spending Review and Autumn Statement 2015 (HM Treasury, November 2015)). It is envisaged that this approach would compare the number of homes that LPAs set out to deliver in its Local Plan against the net additions in housing supply within the LPA area (CPCNPP, para 30). Consequently, LPAs shall have to ensure that OAN figures are suitably robust and achievable

in line with current National planning policy and the emphasis that is being placed on delivery rates.

- 3.11 This matter is particularly pertinent for MC following a recent Appeal Decision (APP/A2280/W/15/3002877) in which the Planning Inspector concluded that the substantial shortfall in previous years in housing delivery when set against the housing requirements, represented persistent under delivery (NPPF, para 47).
- 3.12 The CPCNPP considers that continued significant under-delivery of housing identified over a sustained period, as is the case for MC, should be addressed by appropriate action. The CPCNPP considers that one approach to addressing under delivery rates could be to identify additional sustainable sites if it has been shown that the existing approach is not delivering the housing required. Such sites would need to be in sustainable locations, with appropriate infrastructure available and which can be demonstrated as deliverable. To deliver such an approach, it is recognised that collaboration between developers and local communities, undertaking appropriate consultation would be required to undertake policy reviews, enabling additional land in sustainable locations to come forward (CPCNFF, paras 31 – 33).

Question 5 – What do you consider to be the appropriate housing market area for Medway?

- 3.13 The SHMA (November 2015) defines the Housing Market Area to comprise Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling.
- 3.14 MC should seek to work collaboratively under the 'Duty to Co-operate' to address the housing needs of neighbouring authorities and how housing can be delivered in the HMA that is influenced by other HMAs.

Question 6 – Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

- 3.15 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012-2037), the Local Plan period (2012-2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744 dpa), which would constitute 58% of MC's identified OAN figure of 1,281 dpa. The PPG advises that an increase in the total Local Plan housing figure should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).

- 3.16 The need for affordable housing should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be given to ensure sustainable development and the deliverability of the Plan (para 173).
- 3.17 We would consider that based on the North Kent SHMA (November 2015), seeking the provision of up to 25% affordable housing is appropriate. An increase of the housing requirement to meet the full OAN figure of 1,489 dpa would both be in line with National policy (NPPF, para 47) and therefore “sound”, and contribute to achieving a greater number of affordable dwellings.

4.0 ENVIRONMENT

Question 30 – What are the most effective means to secure and strengthen Medway’s environment, in the context of the area’s development needs?

- 4.1 The NPPF (para 109) directs that the planning system should contribute to and enhance natural and local environment by a number of means, including protecting and enhancing valued landscapes and minimising impacts on biodiversity and providing net gains in biodiversity, where possible. In plan-making terms, the NPPF (para 110) advises that the aim should be to minimise pollution and other adverse effects on the local and natural environment, and plans should allocate land with the least environmental or amenity value, where consistent with other policies in the NPPF.
- 4.2 Therefore, in order to be consistent with National policy, the new Medway Local Plan should allocate land for development which is of the least environmental or amenity value where consistent with other policies in the NPPF in order to minimise any adverse effects.
- 4.3 As part of the now withdrawn Core Strategy, Medway Council produced ‘Further Considerations of Strategic Mixed Use Development Options’ (September 2013) to assess the potential development options for the area. In respect of Option 2, which considered the expansion of Hoo St Werburgh to the south and west (including the Site), noted that this development would not have a direct impact on SPA, RAMSAR, Scheduled Monuments, Ancient Woodland or Conservation Areas.
- 4.4 The Site is not considered to be a valued landscape in Medway Council’s own assessment, as the Site is excluded from the Council’s own designation of Area of Local Landscape Importance (ALLI). The Site is of lesser environmental value than other areas in the vicinity, as clearly indicated by the fact it is excluded from two ALLIs, in close proximity to the north and south. This assessment is considered appropriate, as the Site is subject to a wide range of built development and infrastructural influences and does not fulfil the functions of the ALLIs.
- 4.5 The allocation of the Site in the new Local Plan would therefore be in accordance with NPPF (para 110) by directing development on land which is of the least environmental or amenity value.

Question 32 – What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

- 4.6 Paragraph 113 of the NPPF directs that distinction should be made between the hierarchy of international, national and locally designated sites, so that protection is proportionate with such status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.
- 4.7 To be 'Consistent with National policy', the new Local Plan for Medway should set 'criteria based' policies against which proposals in protected landscape areas can be judged. In order for the Local Plan to be 'Justified' in this respect, we recommend that a Medway-wide landscape review is undertaken to inform both the spatial strategy for the area and landscape based policies.
- 4.8 With regards to 'Land West of Hoo St Werburgh, the Site is not subject to any International, National or Local landscape designations and therefore its development should be considered proportionate to this context, in accordance with the NPPF (para 113).
- 4.9 As noted within the LPIO (January/February 2016) (para 11.5), the Medway Landscape Character Assessment (MLCA) (2011) has analysed and provided planning guidance for the landscape areas across the Borough. The MLCA (2011) makes reference to the (now abolished) Planning Policy Statement 7, which proposed a shift from rigid landscape designations to criteria based policy based on landscape character assessment. A Planning Inspector in a recent Appeal Decision (APP/A2280/W/15/3002877) noted that this criteria-based reference is maintained in the NPPF (para 113) and therefore nothing within the MLCA (2011), in seeking to recognise and protect areas of recognised local landscape character, is inherently inconsistent with the NPPF.
- 4.10 The northern part of the Site lies within the Deangate Ridge Landscape Character Area (LCA) (LCA15), as defined in the MLCA (2011), and the remainder of the Site is within the Hoo Farmland LCA (LCA16).
- 4.11 It is not considered that proposed development of the Site, currently subject to Appeal (APP/A2280/W/15/3132141), would be contrary to the guidelines for LCA15 or LCA16 for the following reasons:

- The siting of the built form has been designed to avoid built form on the more elevated parts of the Site so that the Deangate Ridge landform remains the dominant characteristic feature in the landscape;
- The extent of the built form would only occupy approximately 3% of the total Deangate Ridge LCA and therefore the vast majority of LCA15 would remain as existing, unaffected by development, and enable its continued function to “provide a green buffer that separates and screens RSME Lodge Hill Camp from Hoo St Werburgh” (MLCA, page 56);
- The development introduces new planting along the A228, to strengthen the gateway approach, introduce new green infrastructure links, strengthen and reinforce native tree and hedgerow planting around the edge of settlements;
- The development introduces new planting to respond positively to issues identified by the MLCA (page 59) of a “weak hedgerow/tree framework” thereby creating a stronger sense of place as well as softening built development; and
- Reinforce and mark the village character of Hoo through meaningful open space and land use separating the Site and Chattenden.

5.0 BUILT ENVIRONMENT

Question 36 – What areas of Medway have weaker character and what are the opportunities for improvements?

- 5.1 The NPPF, within its core planning principles, directs that the planning system should take account of the different roles and character of different areas in both plan-making and decision-taking (para 17).
- 5.2 The new Local Plan should take account of the character of the Medway area and encourage opportunities to enhance and improve the area's character, including through new development, which also benefits in contributing to meeting the area's development needs.
- 5.3 In respect of Hoo St Werburgh, the Hoo Peninsula Green Cluster Study (2008) describes that many of villages in Hoo Peninsula, including Hoo St Werburgh, have:

A rather abrupt relationship with the surrounding landscape. This means that the approach to most settlements is neither impressive nor memorable and they rarely function as 'gateways' to the Hoo Peninsula ... There are particular opportunities to influence the design of future development on the fringes of villages, creating more distinctive gateway approaches, improving access to hinterland circular walks and integrating villages within their wider landscape setting.

- 5.4 The development proposals for 'Land West of Hoo St Werburgh' takes particular account of the role and character of the different areas both within and around the Site, notably by maintaining the undeveloped ridgeline of the Deangate Ridge and by reinforcing the key physical characteristics between Chattenden and Hoo St Werburgh.
- 5.5 As noted in the previous Section, the Site was excluded from two ALLIs in close proximity to the Site, and therefore an opportunity is available to contribute to the area's development needs in an area that is of lesser environmental value than other areas in the vicinity in accordance with the NPPF.

6.0 RURAL ISSUES

Question 38 – How should the role of Hoo St Werburgh as a service centre be developed?

- 6.1 We consider that Hoo St Werburgh is a sustainable location, which can play a key role in meeting the development needs of Medway in the Plan period (2012-2035) and can contribute to the Local Plan objective of achieving sustainable development in accordance with the NPPF (para 151).
- 6.2 A broad description of the settlement of Hoo St Werburgh can be found in the 'State of Medway Report: Built Environment' (2012), which was part of the evidence base for the withdrawn Medway Core Strategy. The Report makes clear that Hoo St Werburgh is one of two villages that are the largest and 'most sustainable of the rural communities'. The report states that the village performs the role of a rural service centre for a number of settlements on the Hoo Peninsula, a conclusion maintained in the LPIO (para 13.3), and provides the following description:

Hoo St Werburgh benefits from a wide range of facilities and services to meet local demands and to serve communities on the Hoo peninsula. The main shopping area is focused around Church Street and along Main Road and contains up to 25 business premises, whilst other shops are located away from the centre at Knights Road, Fourwents Road and further west on Main Road. There are two recreation grounds in the village along with two sports grounds and a swimming pool. A primary and secondary school are located on the western side of the village and a library is located close to Hoo St Werburgh parish church, which is one of three places of worship in Hoo.

Hoo St Werburgh is well served by buses during daytime weekly working hours, although the service is reduced during evenings and weekends. It operates between the village and Rochester, Strood and Chatham. Commuter buses also provide a service to London. The A228 Ratcliffe Highway passes to the north of the village and connects to the Isle of Grain to the east, the Medway towns to the south and the national highway network beyond.

- 6.3 In the now withdrawn Core Strategy, Hoo St Werburgh was one of the limited number of areas that was assessed as a realistic option for strategic housing growth in Medway. Growth in this area was considered to help Medway meet its housing need, an approach which should be pursued in the new Local Plan.

Question 41 – What consideration should be given to strategic infrastructure and development in rural Medway?

- 6.4 In accordance with National policy, development should be accommodated in rural Medway where it is sustainable, namely where opportunities are available to achieve economic, social and environmental dimensions of sustainable development and net gains across all three (NPPF, para 152).
- 6.5 Development should be focused in sustainable locations, and opportunities should be taken to focus development in proximity to existing local services and where sustainably located in the context of the wider area.
- 6.6 As noted above, Hoo St Werburgh is the largest village within the Medway area and acts a service centre for wider rural Hoo Peninsula (LPIO, para 13.3). The Site is located adjacent to the built up boundary of Hoo St Werburgh, is well served by a variety of modes of transport and is readily accessible to a good range of existing local services and facilities, including education, retail, leisure and employment uses.

7.0 OPEN SPACE

Question 52 – Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

- 7.1 We consider that open space provision for new development should take a balance between the two approaches. The provision of on-site open space should be considered within the context of each development site, assessing the potential feasibility of a development site to provide for on-site open space provision or whether contributions towards maintaining and enhancing the existing estate is deemed more appropriate.

8.0 SPORTS FACILITIES

Question 54 – What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?

- 8.1 The NPPF (para 73) directs that planning policies regarding open space, sport and recreation facilities should be based on robust and up-to-date assessments that identify the specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. As noted in the PPG, open space can provide health and recreational benefits, and also have an ecological value, form an important part of the landscape and setting of built development, and function as an important component in achieving sustainable development (Reference ID: 37-001-20140306).
- 8.2 MC should therefore undertake a robust assessment to determine the open space, sports and recreational facilities that are needed in the area, and produce new Local Plan policies on this basis.
- 8.3 The development proposals for 'Land West of Hoo St Werburgh' includes 14.81 hectares of on-site open space (approximately 45% of the total Site area) including an area of outdoor sports facilities plus up to 200sqm of community sports pavilion floorspace (Use Class D2), submitted in Outline to allow flexibility for the end user. This proposed element is considered appropriate and beneficial to the development itself and for the surrounding context of Hoo St Werburgh and wider Hoo peninsula, and in line with the PPG, forms an important component in the sustainable development proposals.

9.0 AGRICULTURAL LAND

Question 56 – What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

- 9.1 The NPPF (para 112) directs that LPAs should take into account the benefits of the best and most versatile agricultural land. Where significant development is necessary on agricultural land, LPAs should seek to use areas of poorer quality land in preference to that of higher quality.
- 9.2 It is acknowledged that the NPPF does not preclude development on the best and most versatile land, but the preference stated is for development on poorer quality land where possible. The Site comprises predominantly of Grade 3b agricultural land, i.e. non 'best and most versatile agricultural land', with small areas of Grade 3a on the eastern edge of the Site.

10.0 TRANSPORT

Question 72 – What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

- 10.1 The NPPF (para 29) highlights the importance for the transport system to be balanced in favour of sustainable transport modes and providing users with a choice on how they travel, whilst acknowledging that different opportunities and measures will be required from urban to rural areas.
- 10.2 The new Local Plan for Medway should contain both transport policies and development allocations that support the achievement of sustainable development by locating new development within or adjacent to existing built up areas where existing infrastructure is in place.
- 10.3 'Land West of Hoo St Werburgh' is well served by a variety of modes of transport, including pedestrian, cycle and public transport, in addition to the private motor car. The provision of a Travel Plan, proximity of key local facilities and financial contributions to sustainable transport measures, all of which are provided for in the development proposals, would promote and encourage sustainable modes of transport from the Site to the surrounding areas.

11.0 DELIVERABILITY

Question 77 – Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

- 11.1 We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account different viability between areas of Medway.
- 11.2 The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened"* (NPPF, para 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing, when taking account of the normal cost of development and mitigation, should provide competitive returns to a landowner/developer to enable the development to be deliverable.

12.0 DEVELOPMENT STRATEGY

Question 82 – Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

- 12.1 We consider that a range of development types, as outlined within the LPIO (January/February 2016) should be utilised in meeting Medway's growth requirements. This should be based on an overarching vision of sustainable development, as underpinned by National planning policy. When selecting development types, it is important to consider the aspiration and requirements of National policy.
- 12.2 The NPPF encourages LPAs in plan-making to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. LPAs should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community that is required in particular locations (NPPF, para 50).
- 12.3 As noted in the LPIO (January/February 2016), there remains uncertainty on the development proposals at Lodge Hill, which includes 5,000 residential dwellings, and therefore a pressing need for MC to seek sustainable development elsewhere to meet its development needs. This is further compounded by the reported delay to the Lodge Hill Inquiry (source: Kent Messenger, 11 February 2016), and for which a decision is now unlikely to be made in 2016.
- 12.4 The LPIO (January/February 2016) states that "in the absence of development at Lodge Hill, consideration needs to be given to the Hoo Peninsula in the local plan" (para 27.7). We do not wholly agree with this, and consider that development on the Hoo Peninsula needs to be given consideration in all instances, regardless of the outcome for the Lodge Hill development. As noted above, a range of development types should be utilised in meeting Medway's development requirements, in particular given that the full OAN figure is 1,489 dpa, i.e. 208 dpa more than MC's identified figure, equating to 4,784 more dwellings for the Plan period.
- 12.5 Contained within the consideration of the Hoo Peninsula, is 'Land West of Hoo St Werburgh' and the development proposals for up to 475 dwellings, which would assist MC in meeting its housing need and achieve sustainable development in accordance with the NPPF.
- 12.6 Further detail on the Site and its development proposals are contained in the subsequent Section of these representations.

13.0 LAND WEST OF HOO ST WERBURGH

i) The Site and its Surroundings

- 13.1 The Site lies to the west of Hoo St Werburgh, Kent. The settlements of Wainscott and Strood lie to the south west and a Ministry of Defence landholding at Chattenden lies to the north (Lodge Hill). Nearby to the west is Chattenden whilst Upnor is to the south west on the River Medway. Hoo Marina and Caravan Park are located to the south on the river frontage whilst Kingsnorth Power Station and associated industrial development lie to the east.
- 13.2 The Site is approximately 32.82 hectares in total and extends between the existing urban edge of residential properties on Aveling Close to the east and the A228 dual carriageway to the north-west. The Site is greenfield, currently in agricultural use, and is divided into two parcels of land. The landform of the Site is undulating, and the Site generally falls in level from north east to south west from a height of around 63 metres above ordnance datum (AOD) to a low of around 30 metres AOD before rising again at the extreme south west. The highest section of the Site forms part of the Deangate Ridge which rises beyond the Site to the north.
- 13.3 The Hundred of Hoo Academy (aged 11-18 children) is located immediately south of the Site, and Hoo's village centre lies to the south east of the settlement approximately 1,600 metres from the centre of the Site. However, the Site is closer to the second broad group of facilities in Hoo that run along Main Road, including primary school (circa 900 metres), leisure centre (circa 600 metres), health facilities (circa 1,200 metres) and convenience shops (circa 1,000 metres). Hoo is also well served by public transport, with Main Road acting as an established route for a number of bus services.
- 13.4 The Site is proposed to be accessed via the A228 Peninsula Way/Main Road Hoo roundabout (to the south) and the Ratcliffe Highway to the north west. A further pedestrian/cycle link will be provided (running north-south) to the west of "Hundred of Hoo Academy" buildings – utilising an existing agricultural track.
- 13.5 The Site is not subject to any national or local landscape designations. By comparison, the Lodge Hill application (MC/11/2516) is located in an ALLI and two areas of protected open space. The Landscape and Visual Impact Assessment for the Lodge Hill application concludes that the landscape sensitivity is medium to high and the Committee Report states that the final development would 'inevitably change the general [landscape] character of the site'.

ii) Development Proposals

- 13.6 The development proposal is for a housing-led scheme comprising up to 475 dwellings. Housing will be provided in a range of forms across the Site including terraced, semi-detached and detached houses and apartments. Each phase will include a mixture of housing types as appropriate to its location and local urban design requirements.
- 13.7 Other non-residential uses on the Site comprise up to 200sqm of commercial retail floorspace (Use Class A1/A3/A5) and up to 200sqm of community sports pavilion floorspace (Use Class D2) as shown on drawing 20894 M10G. These elements are submitted in Outline form to provide for flexibility and to allow end users to be identified and come forward with proposals to suit their needs.
- 13.8 Landscaping was fundamental to the landscape-led design approach to the Proposed Development. The proposal includes 14.81 hectares of on-site open space, approximately 45% of the total Site area. The proposed open space includes the following:
- Provision of a central village green area of open space providing recreational opportunities and areas for children's play;
 - Further areas of open space for informal recreation;
 - An area of outdoor sports facilities and a new changing pavilion;
 - Provision of a network of footpaths, accommodating a circular walk of approximately 2.4km;
 - Provision of wetland areas to create new habitats and for attenuation ponds;
 - Additional buffer zones/valley vistas for planting and scrub for ecological/landscape enhancements.
- 13.9 A range of measures were put forward within the submitted Environmental Statement to mitigate for potential impacts on off-site ecological designations, in particular Medway Estuary and Marshes Special Protection Area (SPA), including the following:
- On-site open space designed to encourage recreational use, whilst providing ecological enhancements, and therefore reduce recreational impacts on ecological designations;
 - 'Semi-natural' landscapes and the creation of ponds incorporated into the proposed open space to act as a further interest point for recreational users;
 - Areas of formal open space are proposed, to attract dog walkers by providing opportunities for off-lead dog exercising;

- Formal equipped play areas and formal sports provision, in addition to naturalisation play areas, are proposed to attract further recreational users, such as families and young people;
- A network of footpaths to be incorporated throughout the Site, including a circular walk amounting to approximately 2.5km and a number of route options and shortcuts. The topography of the Site is undulating, which is likely to increase the attractiveness of the path network, and is encouraged by Natural England's SANG guidelines;
- An appropriate lighting scheme to be designed to improve the safety of walkers at night;
- Landscaping is designed to provide a safe environment, with scattered areas of tree and shrub planting interspersed with open areas, rather than densely enclosed woodland;
- Open space provides linkages to off-site Public Rights of Way. For example, the walking distance between Vidgeon Avenue (along PROW RS102) and the proposed open space is 0.7km, which is readily walkable, and likely to attract existing residents in the west of Hoo St. Werburgh to the Appeal Development;
- Pedestrian and cycle links are proposed between the on-site circular walk and Main Street, which will encourage existing residents within Hoo St. Werburgh to visit the on-site open space and provide a more convenient recreational space than the SPA.

iii) Sustainable Development

- 13.10 The NPPF and PPPG puts sustainable development at the heart of the planning system (NPPF, para 7) for both plan-making and decision-taking, and describes it as covering three main aspects including economic, social and environmental.
- 13.11 The development proposals are assessed against these roles below, to demonstrate that they will secure a sustainable form of development that should be sought to be allocated by MC in the new Local Plan to assist in meeting the area's development needs.

Economic Benefits

- 13.12 The main economic benefits of the development can be summarised as follows:
- The scheme would typically provide accommodation for 559 economically active people, which would help to reduce the unemployment rate in Hoo;
 - Part 6 of the Localism Act requires the LPA to have regard to local finance considerations (as far as material to the application) and the New Homes Bonus is now a material planning consideration. If permitted the LPA would receive a New Homes Bonus for the units proposed, which would provide a major local benefit as it amounts to £3m for local use;

- The proposal would result in economic benefits in terms of the direct boost to the local economy during the construction phase (79 construction jobs) and subsequent benefits from additional dwellings in the locality (i.e. through residents spending in the local economy);
- The dwellings provide for a growing workforce that would typically deliver an economic output of £21.9m per annum and the total leisure and retail expenditure generated by occupants to the scheme is predicted to be £8.3m per annum. This represents a major boost to the local economy;
- Infrastructure provision to support the Development requirements would be delivered/coordinated;
- Delivery of high quality family homes to retain and/or attract relatively high earners in Medway. The Development, including detached and semi-detached housing, is appropriate given the deficiencies in the local housing mix in terms of more 'aspirational' dwellings. There is currently a shortage of family-oriented housing in the local area and the provision will help to attract and retain skilled workers locally, supporting investment in job creation high value job growth;
- Additional tax values would be generated in the local area.

Social Benefits

13.13 The Development will contribute to the social dimension of sustainable development as follows:

- Deliver significant affordable housing in accordance with Saved Policy H3 (25%), which would equate to 119 dwellings (NPPF para 47);
- Provide for a significant number of new homes in the local area and make a significant contribution to meeting the identified housing needs of Medway in the short to medium term (NPPF para 47);
- Deliver a significant community benefit through a sports pitch that will meet the needs of residents but also the wider community of Hoo St Werburgh who can share in the use of the facilities. (NPPF para 69-78);
- Support strong, vibrant and healthy communities by providing access to 'high quality open spaces and opportunities for sport and recreation'. (NPPF, para 73);
- Deliver a safe and accessible environment for all to enjoy (NPPF, paras 32 & 69);
- Protect and exploit opportunities for the use of sustainable transport modes for the movement of goods and people (NPPF, para 35);
- Create a safe and secure layout which minimises conflicts between traffic, cyclists and pedestrians (NPPF, para 35);
- Provide contributions to additional education and healthcare infrastructure (NPPF para 69-78); and

- Be accessible to a wide range of community facilities including: Hundred of Hoo Academy; Hoo St. Werburgh Primary School and Marlborough Centre; Hundred of Hoo swimming pool; Hoo Village Hall; The Windmill public house; The Elms Medical Centre; St Marys Island GP Surgery; a local convenience store on the junction of Main Road and Pottery Road; and a shop at the nearby petrol station on the A228.

Environmental Benefits

13.14 The Development will provide the following environmental benefits:

- Deliver high quality green infrastructure with sports and public open usable for active recreation (NPPF para 69-72). A total of 45% of the overall Site area will become high quality public open space;
- Deliver a visually attractive development as a result of good architecture and appropriate landscaping (NPPF, para 58);
- Responds to the local character and setting of the Site and surrounding area (NPPF, para 58);
- Through early public consultation the proposals will deliver a development with the greatest benefits (NPPF, paras 62 & 66);
- The development proposals will contribute to meeting the challenge of climate change through not placing inappropriate development in areas of flood risk (NPPF, para 100);
- Seeks to conserve and enhance biodiversity and incorporates 'opportunities to incorporate biodiversity' (NPPF, para 118). This is a further major benefit of the scheme as low grade agricultural land would be replaced with publicly accessible open space designed to increase biodiversity; and
- Will not give rise to substantial harm to heritage assets (NPPF para 131).

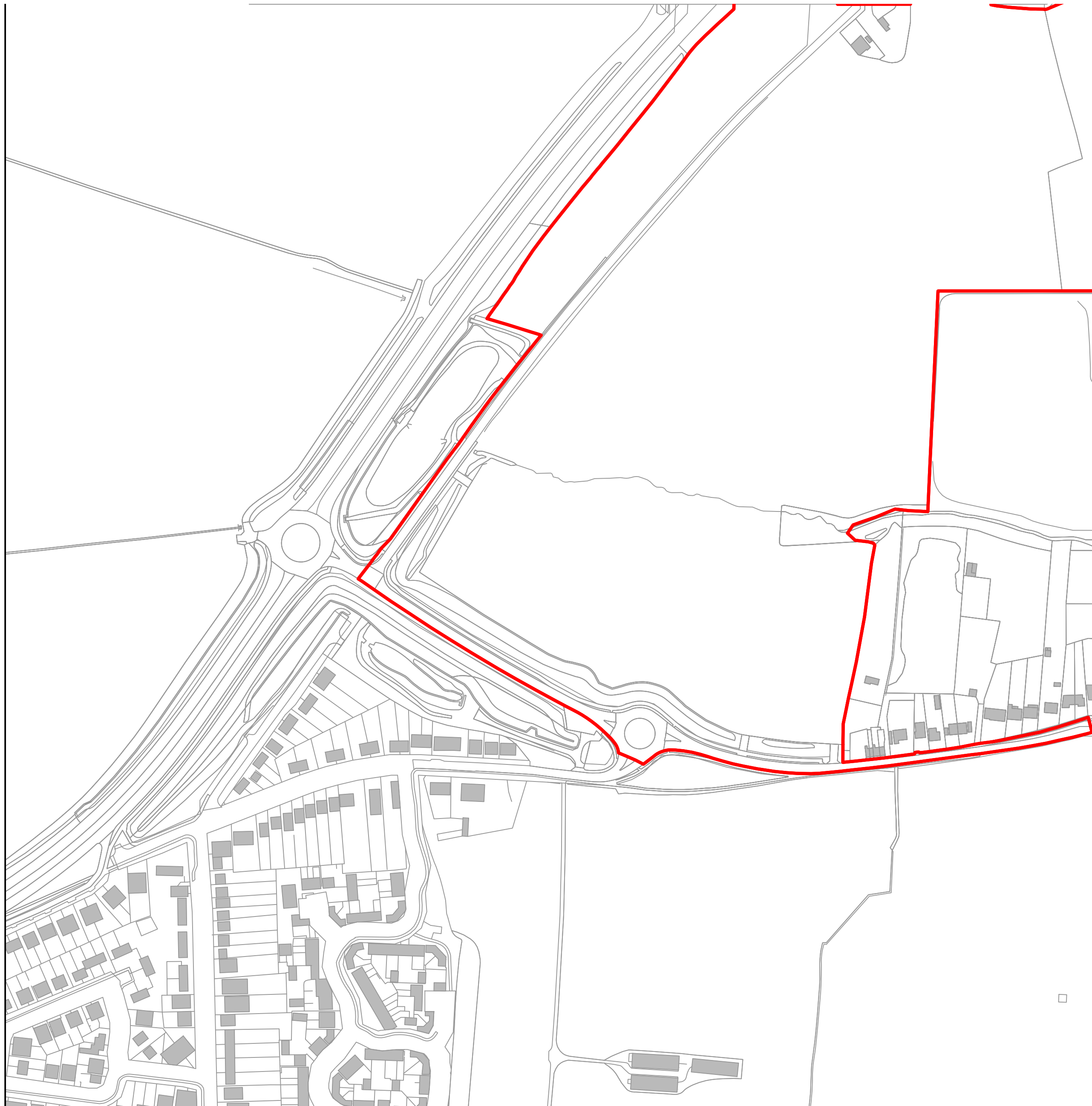
13.15 The development would therefore provide substantial sustainability benefits and constitute a sustainable form of development. The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151).

14.0 CONCLUSIONS

- 14.1 Whilst we support Medway Council's intention to undertake a form of public consultation on a new Local Plan for the area, the LPIO (January/February 2016) is limited in content and is "broad" in the nature of questions it poses.
- 14.2 Based on the information available, we consider that there is further work to be done in order to ensure MC is working towards a "sound" Local Plan. Notably, the current identified housing figure needs to be revisited to identify full OAN, as required by National policy.
- 14.3 It is also vital that the evidence base, which should inform and underpin the Local Plan, is made available prior to any next stage of formal consultation on the Local Plan. Without these, MC will be unable to make an informed decision on future growth strategies for the area, nor will the public be able to make informed comments which in turn would assist MC.
- 14.4 As set out within the main body of this Report, MC should seek opportunities for sustainable development that are already available to the Council, such as the pending Appeal for 'Land West of Hoo St Werburgh' and also recognise the contribution such sites can make in meeting development needs of the area. In addition, we are concerned that the consideration of development on the Hoo Peninsula is caveated by the uncertainty of the Lodge Hill development, when in fact MC should positively seek opportunities to meet the development needs of its area in accordance with National policy and the presumption in favour of sustainable development (NPPF, para 151).
- 14.5 This is further compounded in light of the full OAN identified by Barton Willmore Research of 1,489 dpa for Medway over the Plan period (2012-2035) (**Appendix C**).
- 14.6 As acknowledged in the LPIO (January/February 2016) and MC's previous evidence base documents, Hoo St Werburgh is the largest village that serves the surrounding Hoo peninsula. It is therefore considered a sustainable location that can accommodate development, and can assist MC in meeting its development needs.
- 14.7 Technical work on 'Land West of Hoo St Werburgh' demonstrates that the Site is suitable for residential-led mixed-use development and a sustainable development in accordance with National policy.
- 14.8 The future growth strategy for the Medway area should therefore make a provision for development at the Site in the new Local Plan.

APPENDIX A

SITE LOCATION PLAN (M01 REV E)



APPENDIX B

OBJECTIVE ASSESSMENT OF HOUSING NEED: CRITICAL REVIEW (BARTON WILLMORE, FEBRUARY 2016)

MEDWAY COUNCIL

OBJECTIVE ASSESSMENT OF HOUSING
NEED

CRITICAL REVIEW

Prepared on behalf of Taylor Wimpey

February 2016

MEDWAY COUNCIL
OBJECTIVE ASSESSMENT OF HOUSING NEED
CRITICAL REVIEW
Prepared on behalf of Taylor Wimpey
February 2016

Project Ref:	20894/A5/DU/DM
Status:	Final
Issue/Rev:	02
Date:	29 February 2016
Prepared by:	DM DU
Checked by:	DU DM
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20894/A5/DU/DM/kf
29 February 2016

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1.0 INTRODUCTION

- 1.1 This Technical Note has been prepared by Barton Willmore on behalf of Taylor Wimpey, in order to review the Objectively Assessed Housing Need (OAN) determined for Medway Council as set out in the Council's Strategic Housing and Economic Needs Assessment (SHENA). The SHENA has been prepared in partnership with Gravesham Borough Council, however in this review we focus on the OAN for Medway only.
- 1.2 The review presented here has been undertaken in the context of the policies of the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guidance (PPG) requirements that a full, unconstrained OAN is prepared.
- 1.3 The review is structured as follows:

Section 2 provides an outline of the relevant National Planning Policy Framework (NPPF), the supporting Planning Practice Guidance (PPG), and Local Planning Policy.

Section 3 reviews the latest official demographic evidence for Medway, including:

- Latest ONS population and CLG household projections;
- ONS mid-year population estimates and past migration trends.

Section 4 provides a review of the SHENA in the context of the requirements of PPG's Housing and Economic Development Needs Assessment guidance (ID2a).

Section 5 summarises our critique of the SHENA to recommend an appropriate way forward in assessing overall housing need for Medway.

2.0 PLANNING POLICY CONTEXT

A) NATIONAL PLANNING POLICY

i) Introduction

- 2.1 The National Planning Policy Framework (NPPF, 27 March 2012) and the accompanying Planning Practice Guidance (PPG, 06 March 2014) set out the requirements within which local planning authorities should be setting their overall housing targets as part of a full objective assessment of overall need. These requirements are summarised below.

ii) National Planning Policy Framework (27 March 2012)

- 2.2 NPPF sets out the Government's planning policies for England and how these are expected to be applied. NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the Country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).
- 2.3 In respect of delivering a wide choice of high quality homes, NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).
- 2.4 Furthermore, it states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (paragraph 50).
- 2.5 With regard to plan-making, local planning authorities are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156).
- 2.6 NPPF states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework (paragraph 157).

- 2.7 Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of and strategies for housing and employment uses, taking full account of relevant market and economic signals (paragraph 158).
- 2.8 For plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should:

“prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries; The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

meets household and population projections, taking account of migration and demographic change;

addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).”¹

iii) Planning Practice Guidance (PPG, 06 March 2014)

- 2.9 PPG was issued as a web based resource on 6th March 2014. Guidance on the assessment of housing development needs (PPG ID: 2a) includes the SHMA requirement set out in NPPF and supersedes all previous published SHMA practice guidance (CLG, 2007).
- 2.10 The primary objective of the housing development needs assessment (the SHMA) is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002)
- 2.11 Housing need refers to the scale of housing likely to be needed in the housing market area over the plan period, should cater for the housing demand in the area and identify the scale of housing supply necessary to meet that demand. (PPG ID2a 003)
- 2.12 The assessment of need is an objective assessment based on facts and unbiased evidence and constraints should not be applied (PPG ID2a 004).

¹ Paragraph 159, National Planning Policy Framework, 27 March 2012;

- 2.13 Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

PPG methodology for assessing housing need

- 2.14 The full methodology is set out at ID 2a 014 to 029 (overall housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

Starting point estimate of need

- 2.15 The methodology states that the starting point for assessing overall housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends (ID2a 015).

"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing." (2a-015) (Our emphasis)

Adjusting for demographic evidence

- 2.16 The PPG methodology advises that plan makers may consider testing alternative assumptions in relation to the underlying demographic projections and household formation rates. It also states that 'account should be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates' (2a-017).

Adjusting for likely change in job numbers

- 2.17 In addition to taking into account demographic evidence the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems."
(2a-018)

- 2.18 The PPG also confirms the importance of ensuring sufficient growth in the working age population (16-64), at paragraph 2a-018 and 2a-21:

"Plan makers should make an assessment of the likely change in job numbers based on past trends and /or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area." (2a-018)

"When considering future need for different types of housing, plan makers will need to consider whether they plan to attract a different age profile e.g. increasing the number of working age people." (2a-021)

Adjusting for market signals

- 2.19 The final part of the methodology regarding overall housing need is concerned with market signals and their implications for housing supply (2a-019:020).

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." (2a-019)

- 2.20 Assessment of market signals is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards. Particular attention is given to the issue of affordability (2a-020).

"The more significant the affordability constraints ... and the stronger other indicators of high demand ... the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be." (2a-020)

Overall housing need

- 2.21 An objective assessment of overall housing need can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.

2.22 The extent of any adjustment should be based on the extent to which it passes each test. That is:

- It will at least equal the housing need number implied by the latest demographic evidence,
- It will at least accommodate projected job demand; and,
- On reasonable assumptions, it could be expected to improve affordability.

Affordable housing need assessment

2.23 The methodology for assessing affordable housing need is set out at 2a-022 to 029 and is largely unchanged from the methodology it supersedes (SHMA 2007). In summary, total affordable need is estimated by subtracting total available stock from total gross need. Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

"The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments ... An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." (2a-029) (our emphasis)

B) LOCAL PLANNING POLICY

i) Medway Council Local Plan – Issues and Options 2012-2035 (January 2016)

2.24 The Medway Council Local Plan Issues and Options Plan (draft Plan) represents the first formal stage of the Local Plan process, and sets out a strategy for development in Medway up to 2035.

2.25 In respect of the OAN for Medway, the Plan states the following:

"The Government requires Local Planning Authorities to determine the objectively assessed needs (OAN) for housing in their strategic housing market areas. Work carried out for the North Kent Strategic Housing and Economic Needs Assessment (SHENA) in 2015 has analysed demographic, economic and market signal information to assess the quantity and types of housing that will be needed to meet the projected growth in households over the plan period. This concludes that the Local Plan needs to make provision for up to 29,463 new homes by 2035."²

² Paragraph 7.8, page 21, Medway Council Issues and Options Consultation Document, January 2016

- 2.26 The OAN determined by the Strategic Housing and Economic Needs Assessment (SHENA) equates to 1,281 dwellings per annum over the period 2012-2037, not the plan period (2012-2035). The Plan states how the Council is committed to planning positively to meet the development needs of Medway.
- 2.27 The study Barton Willmore presents here provides a full critique of the SHENA to evaluate whether the OAN is positively prepared in line with the requirement of the NPPF.
- 2.28 The Issues and Options Plan also identifies Medway as a major economic hub within the South East region and Medway's location within the Thames Gateway offers excellent opportunities to stimulate business growth.
- 2.29 A key issue for the Local Plan will be:

"To secure a successful economic base in Medway, providing a range of jobs for residents and securing sustainable growth without exacerbating the need to travel to access high quality job opportunities."³

- 2.30 Furthermore, the Issues and Options Plan outlines the scale of economic growth forecast for Medway as follows:

"To forecast the scale and nature of economic growth anticipated in Medway over the plan period, calculations have been carried out based on an assessment of the population growth projections, the strengths of the local economic, knowledge of growth sectors, and impacts of major strategic developments such as London Paramount. The research has forecast a growth of around 17,200 new jobs in Medway up to 2037. Over half of these jobs are expected in non-B class activities, such as retail and healthcare."⁴

C) SUMMARY

- 2.31 The NPPF and PPG requires that in planning for future levels of housing, local authorities should boost significantly the supply of housing in their area that meets in full, the objectively assessed need for market and affordable housing. In doing so local authorities should;
- identify a scale of housing that meets household and population projections;
 - account for migration and demographic change in formulating housing requirements;

³ Paragraph 8.18, page 32, Medway Council Issues and Options Consultation Document, January 2016

⁴ Paragraph 8.19, page 32, Medway Council Issues and Options Consultation Document, January 2016

- ensure that assessment of, and strategies for, housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals; and
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing.

2.32 The following sections of this report provide an analysis of the starting point in objectively assessing overall housing need according to PPG – official ONS and CLG projections and estimates – and a full review of the SHENA and the OAN it determines for Medway. This will enable us to reach a conclusion as to whether the SHENA provides for full OAN.

3.0 HOUSEHOLD DEMOGRAPHICS

- 3.1 The PPG advises that the starting point for estimating overall housing need should be the latest household projections produced by the Department for Communities and Local Government (CLG) and that account should be taken of the most recent demographic evidence, including Office for National Statistics (ONS) population estimates.
- 3.2 This section reviews the latest official ONS demographic and CLG household data for Medway. Comparisons are made alongside the South East region and the national average.
- 3.3 To align with the assessment of housing need in the Council's draft Plan and the SHENA, we provide our analysis in this section (where possible) based on the 23-year period 2012-2035.

i) Historic population growth – ONS Mid-Year Population Estimates

- 3.4 Medway is currently estimated to have a population of 274,000 according to the ONS 2014 Mid-Year Population Estimates. Since 2001 Medway's population has grown by 24,300 which is equivalent to a rate of 9.7%. Medway's rate of population growth is slightly lower than the national average (9.8%) and lower than the regional average (10.6%) as shown in Table 3.1.

Table 3.1: Historic population change (2001-2014)

	2001	2014	2001-2014 change	
			No.	%
Medway 249,70	0	274,000	24,300	9.7%
South East	8,023,400	8,873,800	850,400	10.6%
England 49,449,7	00	54,316,600	4,866,900	9.8%

Source: Mid-Year Population Estimates, Office for National Statistics

All figures have been individually rounded to the nearest one hundred and may not sum

Percentages have been calculated using unrounded numbers

- 3.5 Population changes as a result of net migration and natural change. Table 3.2 provides the detailed components of change for Medway.

Table 3.2: Components of population change – Medway

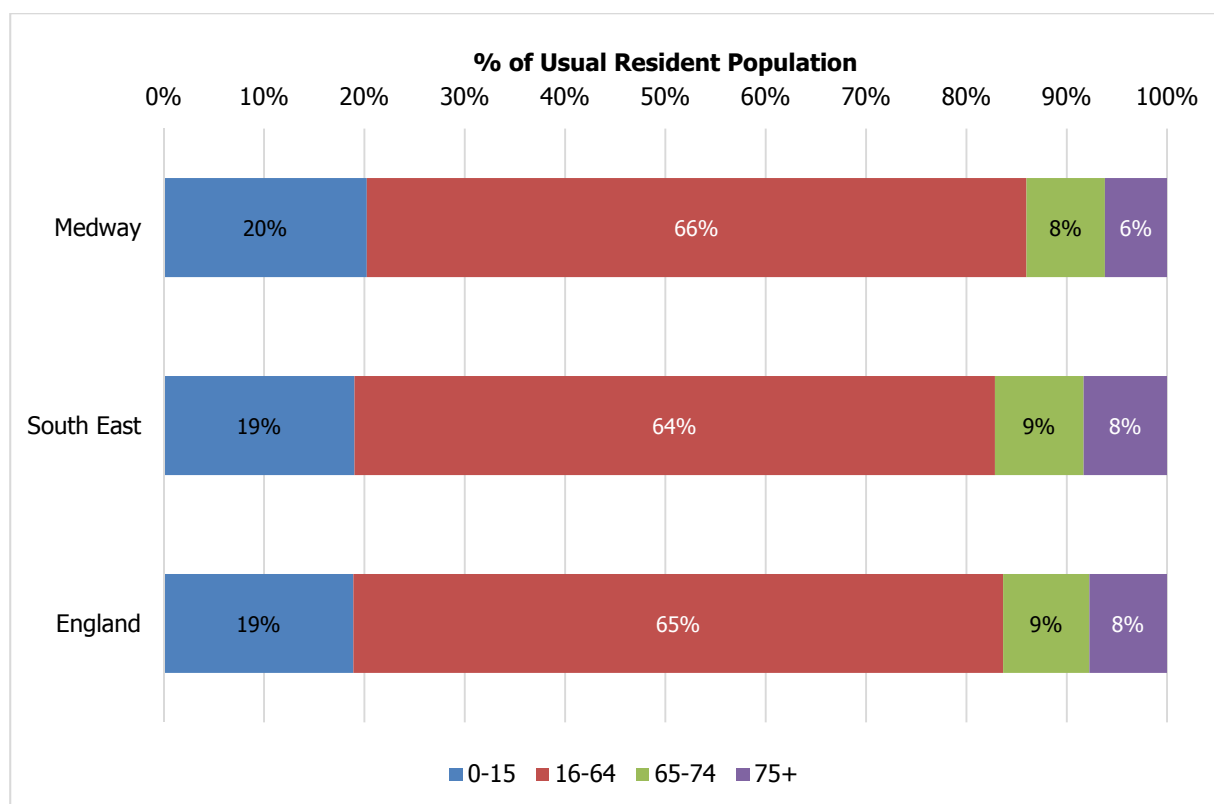
	Natural change	Net Migration	Other changes	Total change
2001/02 8	79	-250	-71	558
2002/03	1046	-270	121 897	
2003/04 9	88	-782	94	300
2004/05 1	,030	-691	300 639	
2005/06 1	,033	115	232 1,380	
2006/07 1	,247	969	130 2,346	
2007/08 1	,304	998	98	2,400
2008/09 1	,383	374	249 2,006	
2009/10 1	,450	776	282 2,508	
2010/11 1	,539	652	-44	2,147
2011/12 1	,546	1,793	-6	3,333
2012/13 1	,452	1,280	155 2,887	
2013/14 1	,510	1,296	104 2,910	
Average 2001/14	1,262	482	126 1,870	
Average 2007/12	1,444	919	116	2,479
Average 2009/14	1,499	1,159	98	2,757
Average 2004/14	1,349	756	150	2,256

Source: Mid-Year Population Estimates, Office for National Statistics

- 3.6 At the start of the decade Medway experienced net outward migration. However, since 2005 net migration to Medway has been positive meaning that more people have moved to Medway than moved out.
- 3.7 Medway has also experienced positive natural change (more births than deaths) which has increased between 2001 and 2014. In addition there is positive 'other' change (change that is not possible to identify as either migration or natural change) equating to 1,640 people, or an average of 130 people per annum over the period 2001-2014.
- 3.8 Over the period 2001 and 2014, population change in Medway has largely been as a result of natural change (67%). However more recent trends reflect a shift in the components of population change as a result of net migration increasing considerably since 2011.

- 3.9 Medway has a younger age profile than the regional and national averages, with a larger proportion of the population aged 0-15 years and 16-64 years, as shown in Figure 3.1.

Figure 3.1: Age profile, 2011



Source: 2011 Census

ii) Office for National Statistics (ONS) population projections

- 3.10 The ONS produces population projections for all local authority areas in England. These are referred to as the Sub National Population Projections (SNPP) and are published by the ONS usually every two years.
- 3.11 The ONS SNPP are trend-based projections. That is, they project forward past demographic trends in births, deaths and migration. They do not take account of any future changes to government policy which may affect these past trends.
- 3.12 Table 3.3 sets out the official ONS SNPP in chronological order from the 2008-based series to the most recent 2012-based SNPP (29 May 2014). The 'interim' 2011-based SNPP and 2012-based SNPP take account of findings from the 2011 Census of the population. Growth is considered over the period 2012-2033 (2008-based) and 2012-2037 (2012-based). However, in line with the Medway Plan period, growth has also been considered over the period 2012-2035. The shorter period presented in respect of the 2008-based series is due to the projections finishing in 2033.

Table 3.3: ONS Population Projection series for Medway

Series	2012	2021	2033/35	2037		2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	268,200	290,500	322,700*	326,800		22,300 (2,480)	54,500 (2,370)	58,600 (2,340)
2011-based (interim)	267,300	290,300				23,000 (2,560)		
2008-based	257,600	269,700	286,300**			12,100 (1,340)	28,700 (1,370)	

Source: Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding

*2035;

**2033.

- 3.13 The latest 2012-based SNPP project significantly higher population growth than the previous full 25-year projection series (the 2008-based SNPP) and marginally higher growth than the interim 2011-based series. This is expected given the analysis presented earlier in this chapter which shows net migration to Medway increasing in recent years.
- 3.14 Despite the 2012-based SNPP projecting the highest population growth, it is important to note that the 2012-based SNPP are underpinned by trends captured over the 2007-2012 period. This period was characterised by an economic recession and for this reason, resulted in atypical migration trends in some areas.
- 3.15 From reference to the 2012-based ONS SNPP components of change, the 2012-based ONS SNPP is underpinned by average net in-migration of 840 people per annum, 2012-2035. However, analysis of net migration trends from the period 2007-2012 from which the 2012-based SNPP trends are drawn puts average net migration at 919 people per annum. This compares to the most recent long-term trend (2004/5-2013/14) of 760 people per annum and the most recent 5-year trend (2009/10-2013/14) of 1,160 people per annum.
- 3.16 The analysis of migration trends for Medway therefore suggests a short-term trend in Medway is a prudent base from which to plan. However, whilst the most recent 5-year migration trend suggests higher net migration to Medway (largely influenced by the three most recent years) than the 2012-based SNPP, it is not possible to say with any certainty whether Medway will see a continued rise in migration. On this basis, the 2012-based SNPP are considered to provide a reasonable demographic projection for Medway.
- 3.17 However, the 2012-based SNPP are considered to represent the very minimum of future population growth in Medway given the 2012-based SNPP are considered to be conservative due to the national projections which underpin them. The 2012-based SNPP are constrained to the 2012 National Projections published in 2013. The national projection is based on an

assumption of 165,000 net international migrants coming into the UK per annum, and this assumption is projected forward per annum over the full 25 years of the 2012-based SNPP period. However net international migration of 165,000 people per annum conflicts significantly with the latest migration statistics report by the ONS, which shows net international migration of 336,000 people in the year ending June 2015, over double the 2012-based SNPP assumption.

- 3.18 The ONS appear to have noted this significant increase in net international migration, recently publishing the 2014 National Projections and assuming 185,000 net international migrants per annum. However this remains significantly lower than has been seen in the recent past. Although the forthcoming 2014-based ONS SNPP (expected May 2016) will project higher population growth across the country on the basis of these revised 2014-based National Projections, the assumption of 185,000 net international migrants per annum remains a very conservative estimate on the basis of recently recorded trends.
- 3.19 In this context the 2012-based SNPP are considered to be underpinned by assumptions which lead to a minimum level of population growth over the Plan period (2012-2035). Therefore the projected population growth presented in Table 3.3 is very likely to be conservative given that Medway is historically a net receiver of international migrants.
- 3.20 It is important to be aware of the issues related to the SNPP because the CLG household projections underpinned by the 2012-based SNPP. The household projections are derived by applying household representative rates to the ONS population projections. Household projections will be discussed in the next section.
- 3.21 The 2012-based ONS SNPP project the working age population to grow at a much slower rate than the population as a whole as is shown in Table 3.4. Given the extension of State Pension Age, there will be an increasing number of people working beyond the age of 64 years and therefore it is also important to consider the projected growth of the 65-74 year old population.

Table 3.4: Working Age Population Change, 2012-2035

Age Group	Medway
16-64 18,0	50 (10.3%)
65-74 11,9	00 (53.5%)
Total (16-74 years)	29,950 (15.2%)
Total (all ages)	57,800 (21.8%)

Source: 2012-based SNPP, Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding. Percentages calculated using unrounded numbers.

- 3.22 It is evident from Table 3.4 that the growth in the working age population (16-74 years) in Medway is heavily driven by the growth in the population aged 65-74 years (53.5% growth). Realistic assumptions need to be applied as to how greatly people over the age of 65 years can contribute to the resident labour force.
- 3.23 The PPG states 'where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns' (PPG, ID2a, 018). Whilst the 2012-based SNPP do project an increase in the working age population in Medway, further work is required in order to determine whether the level of workforce growth is sufficient to support the projected level of job growth.

iii) Communities and Local Government (CLG) household projections

- 3.24 Table 3.5 sets out the official CLG household projections in chronological order from the 2008-based series to the most recent 2012-based series (27 February 2015).

Table 3.5: CLG Household Projections for Medway

Series	2012	2021	2033/35	2037	2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	108,190	120,470	137,640*	139,950	12,280 (1,360)	29,450 (1,280)	31,760 (1,270)
2011-based (interim)	107,970	119,320			11,350 (1,260)		
2008-based	107,470	116,090	125,890**		8,620 (960)	18,420 (880)	

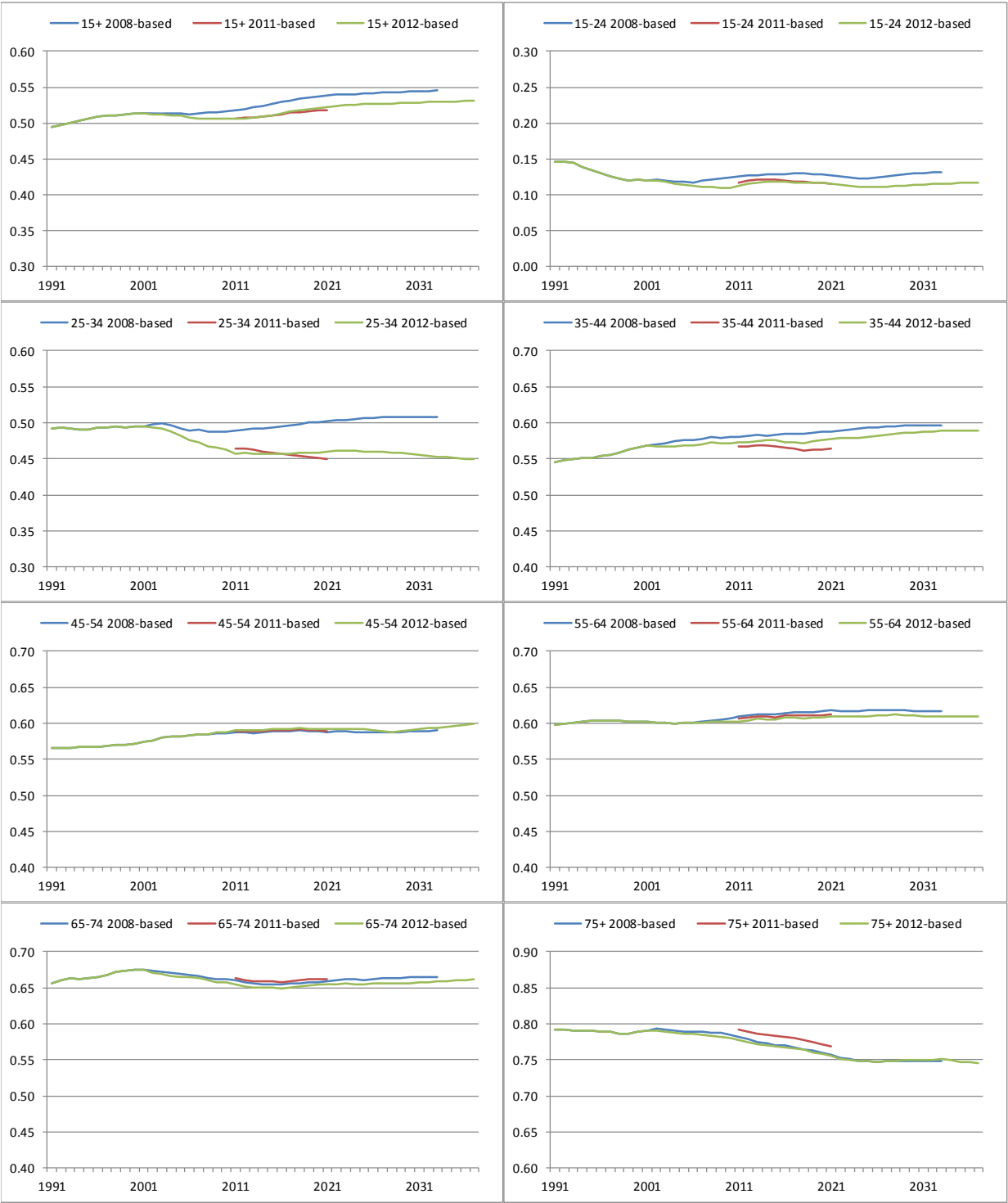
Source: (CLG) Communities and Local Government (rounded to nearest 100) Note: Figures may not sum due to rounding
 *2035; **2033

- 3.25 As the PPG states the CLG projections should form the 'starting point estimate' only of overall housing need as part of a full objective assessment of need. The latest CLG 2012-based household projections show growth of 1,280 households per annum in Medway over the Plan period (2012 and 2035). To reach a dwelling requirement, account needs to be taken of vacant and second homes. For Medway this rate is 3.27%⁵ resulting in a dwelling projection of 1,323 dwellings per annum, 2012 to 2035.
- 3.26 The growth projected by the CLG 2012-based household projections is higher than the growth projected by the previous two series of household projections (the 'interim' 2011 and 2008-based series), but this is expected given the 2012-based SNPP projected higher population growth than the other two series.

⁵ CLG, CTB 2014 (Second Homes); CLG Live Table 125/615 (Vacant)

- 3.27 However, like the 2012-based SNPP, the 2012-based household projections are also underpinned by recessionary trends in relation to household formation, whereas the 2008-based projections are underpinned by trends gathered prior to the recession and are therefore higher in terms of projected household formation, particularly in younger age groups.
- 3.28 The CLG have published household formation data for the 2012-based household projections (household formation rates by age and gender). The rates show that household formation in the 2012-based projection still projects a declining household formation rate trend in the 25-34 and 35-44 age groups (see Figure 3.2 below) when compared with the interim 2011-based and 2008-based projections.
- 3.29 The interim 2011-based household projections were widely regarded to project forward very low household formation in younger age groups. This was due to the trends underpinning the projections covering the period just prior to and including the recessionary period, when housing became rapidly less affordable for people in the younger age groups due to a lack of supply.
- 3.30 Figure 3.2 illustrates that the 2012-based rates for Medway follow a similar trajectory to that of the interim 2011-based projections before them. After 2025 the 2012-based projection shows a declining trend which results in the gap between the 2008 and 2012-based rates increasing, and suppression in the 2012-based rate worsening.

Figure 3.2: Household Formation Rates, Medway



Source: CLG

- 3.31 The trend for declining household formation in the 25-44 age group is likely to be caused in part by worsening affordability. Planning for housing on the basis of a continuation of these suppressed household formation rates is not supported by PPG which recommends adjustments to households formation rates to reflect factors not captured in past trends (ID 2a-015).
- 3.32 Furthermore, planning on the basis of the 2012-based household formation rates is not considered to be in accordance with the principles of positive planning, and would likely place significant pressure on housing supply. Recent Planning Inspectorate decisions concur with this view.⁶
- 3.33 In this context, and given that the 2012-based projections show slightly lower household formation particularly for 25-44 year olds than the pre-recessionary 2008-based projections, it is considered that an adjustment needs to be made to comply with the National Planning Policy Framework's (NPPF) clear policy to 'boost significantly' the supply of housing, 'promote economic growth' and 'positively prepare' Local Plans.
- 3.34 How this adjustment should be applied has been subject of much debate, and there is not considered to be one correct answer, as it is a matter of judgement. However Barton Willmore would suggest a blended approach whereby the 2012-based HFRs are applied in all age groups, as published, with the exception of the 25-44 age group. In this age group it is considered that a gradual return to the projected 2008-based HFRs by the end of the Plan period is applied. This is considered to comply with the NPPF requirement to ensure that Local Plans are positively prepared, and a significant boost is made to housing supply.

iv) Housing Completions

- 3.35 A lack of housing completions can have a significant impact on the ability for people to move into an area to live, and for existing residents to have the opportunity to purchase their own property. A lack of housebuilding can lead to existing residents having to migrate out of the area. Table 3.6 sets out net completions for Medway over the past 10 years.

⁶ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

Table 3.6: Net Completions, Medway

Year	Net Completions	Plan Target	Surplus/Deficit
05/06 562		700	-138
06/07 591		815	-224
07/08 761		815	-54
08/09 914		815	+99
09/10 972		815	+157
10/11 657		815	-158
11/12 809		1,000	-191
12/13 565		1,000	-435
13/14 579		1,000	-421
14/15 483		1,000	-517
Total	6,893	8,775	-1,882

Source: Annual Monitoring Report

- 3.36 As Table 3.6 shows, since 2005/06 the number of completions has consistently fallen below Development Plan targets, with the exception of two years (08/09 and 09/10). This has resulted in a deficit of -1,882 dwellings over 10 years, representing 20% of planned supply.
- 3.37 Furthermore when compared against the official CLG household projections set out above in Table 3.6, the starting point estimate of need has been at least 1,260 per annum, which suggests under-delivery has been even worse than the comparison against Plan targets.
- 3.38 Notwithstanding this it is considered that this persistent under-delivery in Medway will have had a significant impact on the propensity of people to migrate into the area over the last 10 years. The net-migration trends can therefore be considered to have been constrained by a lack of delivery.

v) Summary

- 3.39 In summary, this section has considered the most up-to-date official population and household projections published by CLG and ONS. The key headlines from this section are as follows:
- The PPG emphasises that CLG household projections should only form the 'starting point' in an objective assessment of the overall housing need, and that sensitivity testing based on alternative demographic and household formation assumptions may be considered;

- This 'starting point estimate' is currently growth of 1,281 households per annum in Medway, using the latest 2012-based CLG household projections over the period 2012-2035 (Medway's plan period). Applying a household/dwelling adjustment (to account for vacancy and second home rates) the overall housing need is 1,323 dwellings per annum;
- However, Barton Willmore consider that growth of 1,323 dwellings per annum could represent an underestimate of demographic-led housing need for a number of reasons:
- The 2012-based household projections are based on household formation rate trends observed over the recessionary period, when affordability worsened significantly. There remains suppression in the household formation rates for 25-34 year olds in Medway. PPG states that adjustments may be required to the household projection estimate of need if rates have suppressed historically (paragraph 15). An adjustment in Medway is considered necessary in the 25-34 age group to address this suppression;
- Analysis of net housing completions has highlighted that annual completions have consistently fallen below the level of need required by consecutive Development Plans, and below official CLG household projections, inhibiting the propensity of people to migrate into Medway. This would have directly influenced the net migration trends underpinning the 2012-based ONS SNPP and the 2012-based CLG household projection;
- The 2012-based ONS SNPP are also considered a conservative projection in respect of the international migration assumption they are underpinned by (165,000 people per annum). This is less than half the most recent trend data from ONS shows (336,000 people per annum).
- Analysis of migration trends has concluded that the 2012-based SNPP provide a reasonable basis on which to assess demographic-led need in Medway at this point in time. However, for the reasons set out above the 2012-based SNPP should be considered a very minimum and if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase, then an updated short term migration should be considered.

3.40 This section identifies how the starting point estimate of OAN (1,323 dpa, 2011-2031) for Medway should be considered a very minimum.

3.41 The following section of this study considers the evaluation of official ONS and CLG data in the context of the Council's OAN evidence.

4.0 REVIEW AND CRITIQUE OF THE STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

A) INTRODUCTION

- 4.1 The Strategic Housing and Economic Needs Assessment (SHENA) dated November 2015 provides the evidence base to support the Council's determination of Objectively Assessed Need (OAN) for housing in Medway. The report has been prepared by Bilfinger GVA.
- 4.2 In the context of our assessment of demographic data in the previous section of this study, the following section provides an analysis and evaluation of the SHENA's approach to OAN in Medway. The analysis we present follows the methodological requirements of section ID2a – 'Housing and Economic Development Need Assessments' (HEDNA) to determine whether the Council's proposed housing target (1,281 dwellings per annum) represents full, unconstrained OAN.
- 4.3 It is important to note that the SHENA has assessed OAN over the period 2012-2037 which is the time period considered by the latest 2012-based projection series. However, the draft Local Plan covers the period 2012-2035.

B) NORTH KE NT STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

- 4.4 The 2015 SHENA seeks to establish the OAN for Medway following the methodology outlined in PPG. We would comment on the SHENA as follows:

i) Housing Market Area (HMA)

- 4.5 The SHENA begins with an assessment of the appropriate HMA in which to assess housing needs for Medway as required by PPG (ID 2a-010-20140306). The assessment's analysis draws on research published by CLG in 2010 titled 'Geography of Housing Market Areas'. In essence this research is based on work undertaken by the Centre for Urban & Regional Development Studies (CURDS) at Newcastle University.
- 4.6 The CURDS analysis is correctly presented by the SHENA as identifying Medway as falling within the London Strategic Housing Market Area which contains over 70 local authority areas. The SHENA considers this HMA definition is unmanageable and impractical (paragraph 2.9). Barton Willmore concurs with this conclusion.

- 4.7 For this reason, the SHENA also considers travel to work and migration patterns, and house price data and concludes that Medway has strong relationships with a number of neighbouring local authority areas. On this basis, the SHENA identifies a wider HMA which includes: Medway; Gravesham; Swale; Maidstone; and Tonbridge & Malling. The housing needs of the wider HMA are assessed in the SHENA
- 4.8 Barton Willmore consider the HMA definition applied in the SHENA to be inconsistent with the approach adopted in several of the authorities included within the definition. For example, Swale's housing needs were considered in isolation at the recent (November 2015) Local Plan Examination after the evidence base suggested Swale formed a HMA on its own. Similarly, Maidstone Borough are assessing their housing needs in isolation. Although Maidstone's SHMA identifies functional relationships between Maidstone and Medway, the Maidstone SHMA concludes that there is justification to distinguish Maidstone from Medway in market terms⁷. On this basis, the Maidstone SHMA considers Maidstone represents a HMA on its own.
- 4.9 On the basis of Maidstone Council and Swale Council both assessing their needs in isolation, Barton Willmore, for the purposes of this critique, consider Medway's needs in isolation.

ii) Starting point estimate

- 4.10 The SHENA gives detailed consideration to the latest 2012-based ONS Sub National Population Projections (SNPP) and CLG household projections as representing the 'starting point' estimate of need. Growth of 1, 270 households per annum over the period 2012-2037 is correctly presented. However, it is important to note that over the period covered by the draft Local Plan (as presented in the current Issues and Options consultation as being 2012-2035) growth is 1,280 households per annum. The SHENA does not present this.

iii) Demographic adjustments

- 4.11 The PP G (paragraph ID2a-017) states how plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest ONS population estimates.

⁷ Paragraph 2.39, page 29, Maidstone Strategic Housing Market Assessment – Maidstone Borough Council, Final report, January 2014, GL Hearn

Adjustment to household formation rates

- 4.12 The SHENA does not undertake any sensitivity testing in relation to household formation.
- 4.13 The analysis presented in Chapter 3 of this report has shown clear suppression in household formation for those people aged 25-44 years, which Barton Willmore considers should be addressed through making an adjustment to the rates.
- 4.14 The danger of planning on this basis of the 2012-based household formation rates would be to exacerbate this suppression over a 23-year Plan period, adding to the trend of worsening affordability in Medway, and the inability of first time buyers to form their own households. This is not considered to comply with the NPPF requirement to positively prepare Development Plans.
- 4.15 Recent appeal decisions⁸ have agreed that there remains an element of suppression in the 2012-based household formation rates. A more positive approach to household formation in this age group would increase the starting point estimate above 1,270 households per annum (2012-2037)/ 1,280 households per annum (2012-2035).

Adjustment to the demographic projections

- 4.16 The SHENA presents three sensitivity scenarios with regards to the underlying population projections as an alternative to the published 2012-based ONS SNPP.
- 4.17 The **first** demographic sensitivity scenario included by GVA incorporates the 2013 and 2014 Mid-Year Population Estimates (MYPE), published by the ONS after the 2012-based SNPP were published. Despite the 2013 and 2014 MYPE projecting higher population growth than projected in the 2012-based SNPP, the effect of the SHENA incorporating the 2013 and 2014 MYPE into the 2012-based SNPP is to reduce household growth from 1,270 to 1,235 households per annum (2012-2037).
- 4.18 This seems counterintuitive (a point which the SHENA also raises at paragraph 5.38). However, the SHENA states that the reduction in household growth is due to the different age/ gender profile applied as a result of taking account of the 2013 and 2014 MYPE. This requires further investigation through bespoke modelling to establish whether this statement is correct.

⁸ Coalville and Cornwall

- 4.19 The **second** is a long-term (2005-2014) net-migration scenario which results in household growth of 1,148 households per annum – again lower than the ‘starting point’ estimate for 1,270 households per annum (2012-2037) as indicated by the 2012-based CLG household projections. This scenario projects household growth that is 10% lower than the starting point estimate.
- 4.20 Lower household growth is the result of lower projected population. The long-term trend (2005-2014) projects lower population growth because net migration is assumed to be lower (756 net migrants per annum) compared to the average net migration assumption of the 2012-based ONS SNPP (840 people per annum based on trends from the period 2007-2012).
- 4.21 At paragraph 5.39 the SHENA states that the later years of the inter-Census period (2001-2011), and the last three years since the 2011 Census (2012-2014) show the highest levels of population growth in Medway since 2001. The SHENA then goes on to state how the 2012-based CLG household projections are underpinned by trends drawn “principally from this period of high growth”⁹, and it is therefore appropriate to consider longer term trends from 2004-2014.
- 4.22 In this regard the latest Planning Advisory Service (PAS) guidance on OAN summarises the problems of using the 2007-2012 period as follows:

“The base period used in the latest official projections, 2007-12, is especially problematic. The period covers all of the last recession, in which migration was severely suppressed as many households were unable to move due to falling incomes and tight credit. Therefore the official projections may underestimate future migration - so that they show too little population growth for the more prosperous parts of the country, which have been recipients of net migration in the past. If so, by the same token the projections will also overestimate population growth for areas with a history of net out-migration.”¹⁰

- 4.23 Whilst Barton Willmore do not disagree with the consideration of longer term trends, the PPG supports adjustments to the ‘starting point’ estimate of need in relation to the underlying demographic projections and household formation rates. However, PPG states that any local changes would need to be clearly explained and justified on the basis of the established sources of robust evidence (ID 2a-017-20140306). In this instance, consideration of longer term trends does not seem appropriate for Medway as a analysis of components of population change (see

⁹ Paragraph 5.39, page 93, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

¹⁰ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

Table 3.2 presented in Chapter 3 of this report and Figure 29 of the SHENA) clearly identifies net migration to Medway increasing since 2011. Therefore to consider a level of net in-migration lower than the 2012-based ONS SNPP in Medway is considered to wholly contradict the advice of the PAS Guidance.

- 4.24 GVA have chosen not to analyse a more recent 5-year trend, a decision Barton Willmore do not consider to be justified.
- 4.25 Analysis of migration trends, presented in Chapter 3 of this report, has illustrated that a more recent 5-year migration trend (2009/10 – 2013/14), which incorporates the last few years of recession, and the recent economic upturn, suggests net migration of 1,159 per annum. This is higher than the assumptions which underpins the 2012-based SNPP (840 migrants per annum) based on trends from the period 2007-2012.
- 4.26 However, there is not sufficient data at this point in time to say with any certainty whether Medway is experiencing a reversal of trend in terms of net migration. For this reason, despite a more recent 5-year trend showing higher net migration than the 2012-based SNPP, it is considered that the 2012-based SNPP provide the most reasonable demographic projection at this point in time. However, the 2012-based SNPP should provide the very minimum projection of population growth given the issues highlighted in Chapter 3 of this report. Furthermore, we reserve the right to amend this approach if subsequent releases of Mid-Year Population Estimates indicate that net migration to Medway is continuing to increase.
- 4.27 A **third** sensitivity scenario is the long-term net-migration scenario (2005-2014) including the 'unattributable population change' (UPC) recorded by ONS for Medway. The UPC is an element of population change which the ONS cannot account for. There is the possibility that it may be due to under recorded levels of international migration, but it could equally be due to other reasons.
- 4.28 The effect of including UPC within the long-term migration trends scenario is to reduce household growth to 1,124 households per annum (compared to growth of 1,148 households per annum excluding UPC) over the period 2012-2037.
- 4.29 Barton Willmore's approach is to exclude UPC from demographic modelling scenarios. This is based on the following:
- ONS' confirmation that UPC has been excluded from the calculation of the 2012-based ONS SNPP;

- Advice sent by email from ONS to Barton Willmore that it would be 'sensible' to exclude UPC from the calculation of net-migration trends;
- The ONS statement that if UPC was due to international migration, its effect would have been in the first half of the decade, after which the recording of international migration was improved;
- Local Plan Examination decisions where UPC has been excluded (Aylesbury Vale, Eastleigh, Arun). In the case of the most recent decision in Arun (February 2016), UPC was significant, yet the Inspector noted that if UPC were to be attributed to migration, errors would have been earlier in the 2001-2011 period;
- The ONS' statement that UPC is only applicable to the 2001-2011 period and does not introduce a bias that will continue in future projections.

4.30 The UPC scenario is therefore not considered to be a robust scenario for growth in Medway.

4.31 The SHENA presents demographic-led need in Medway to be between 1,124 and 1,270 households per annum over the period 2012-2037 based on the results of the two long-term migration trend scenarios. Once an allowance for vacancy has been applied this results in dwelling growth of between 1,167 and 1,317 dwellings per annum.

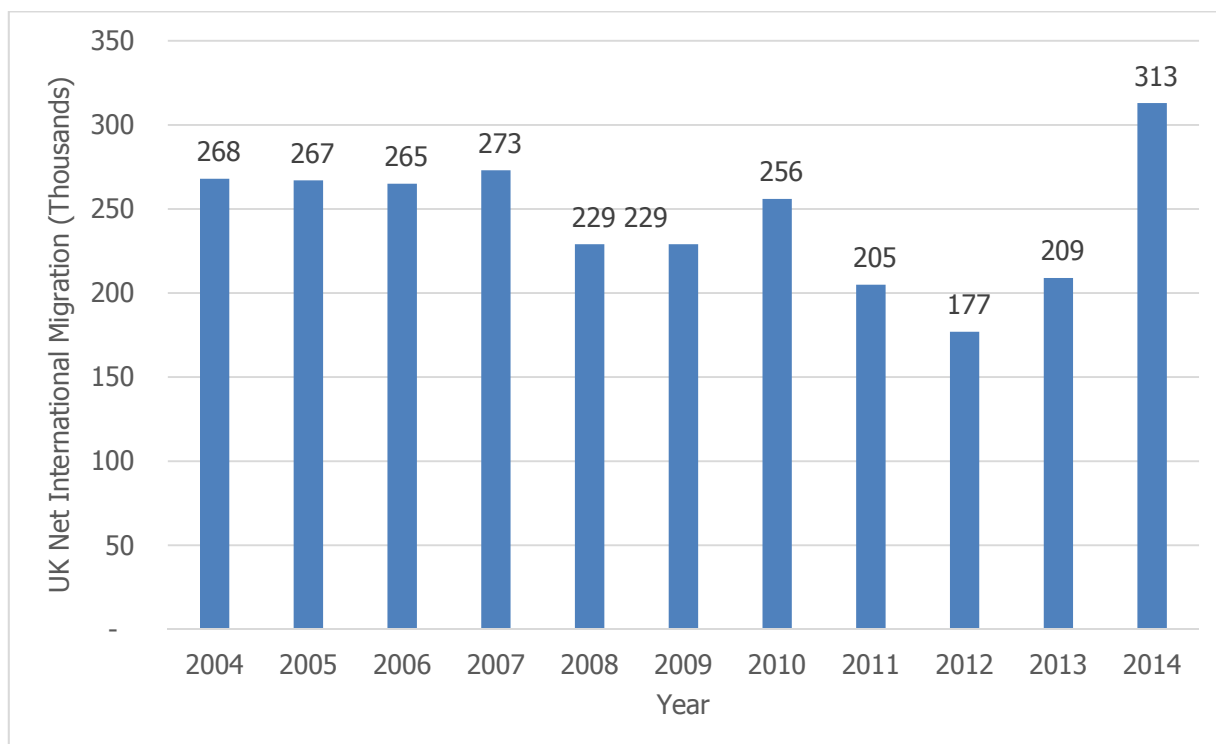
4.32 However, the SHENA acknowledges that due to the uncertainty of UPC, it is appropriate to consider an average of the two long-term migration scenarios (including and excluding UPC)¹¹. This results in growth of 1,136 households (1,179 dwellings) per annum over the period 2012-2037.

4.33 Barton Willmore consider that OAN of less than the 2012-based CLG household projection should not be considered, for the following reasons:

4.34 First, the 2012-based ONS SNPP were underpinned by net migration trends between 2007 and 2012, and as this analysis shows, they are underpinned by three years (2008-2011) when net in-migration fell significantly below two of the years prior to the 2007-2012 period. This contradicts GVA's statement that the later years of the 2001-2011 period show the highest levels of growth. This statement by GVA is not considered to be justified.

¹¹ Paragraph 5.47, Page 95, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

- 4.35 The **second point** concerns the assumption of net international migration in the 2012-based ONS National Projections, which underpin the 2012-based ONS SNPP. The 2012-based ONS national population projections are based on net international migration of 165,000 people per annum continuing every year up to 2037.
- 4.36 The assumption of net international migration in the ONS 2012-based national projections is considered by Barton Willmore to be a significant underestimate. This view is based on more recent evidence from ONS which shows how international net-migration was 336,000 people in the most recently recorded year (ending June 2015) – over double the 2012-based ONS national projection assumption. The 10-year average has also been circa 240,000 people per annum (see Figure 4.1 below).
- 4.37 On this basis alone, it is considered the 2012-based ONS SNPP, and therefore the 2012-based CLG household projections, are based on conservative assumptions and for this reason should be considered a minimum projection of future growth.
- 4.38 This is emphasised further by the more recent 2014-based national projections (29 October 2015) which have increased the assumption to 185,000 people per annum. The effect of this increase will be seen in the 2014-based SNPP, which are due for release in the first half of 2016.
- 4.39 A further effect on in-migration is the delivery of housing. Table 3.6 in this study has shown how delivery has fallen below planned targets in all but two of the past ten years. The cumulative effect has been for a deficit in delivery of 1,882 dwellings (20% lower than planned supply). This will have constrained in-migration to Medway, and trends would have been higher if planned housing targets had been met and the homes were there to be filled.

Figure 4.1: UK Net International Migration, 2004-2014

Source: Migration Statistics Quarterly Report, November 2015

4.40 Finally it is considered the past three years net in-migration to Medway (1,280, 1,293, and 1,793 people per annum respectively) highlight how the 2012-based SNPP and CLG projections are based on a conservative net in-migration assumption of only 840 people per annum.

4.41 However, given there is no degree of certainty as to whether Medway is experiencing a reversal of trend in relation to net migration, it is considered that the 2012-based SNPP at the very least should provide the minimum projection of future population growth. On this basis, for the Medway SHMA to favour the long-term migration trend approach (which projects lower population growth) is considered inappropriate.

4.42 In summary, it is not considered justified to project lower population or housing growth than the starting point estimate.

iv) Adjustments to support economic growth

4.43 The approach applied by GVA in the SHENA to economic-led OAN is generally considered robust, save for the assumptions in respect of job growth forecasts. GVA use a single source, Experian Economics, from quarter 1 of 2015. Experian is considered a robust source of job growth forecasts, however it is Barton Willmore's view that an average forecast should be taken from three sources; Experian Economics, Cambridge Econometrics, and Oxford Economics. This

view has been taken following criticism of the use of using a single source in some Local Plan examinations, given the fluctuation in forecasts, which are often published on a quarterly basis. This triangulated approach was supported by the South Worcestershire Local Plan Inspector¹².

- 4.44 In terms of unemployment assumptions, Barton Willmore's approach would be to assume a return to pre-recessionary rates of unemployment over the first ten years of the Plan period. This is a similar approach to the GVA method although they do differ slightly.
- 4.45 Economic activity rate assumptions must also be entered into demographic modelling software to generate the labour force growth required to fill jobs. GVA's approach is to use the Kent County Council 'Technical Paper Activity Rate Projections to 2036' paper (October 2011). This is the same source used by Barton Willmore, and is considered to be a robust independent method which provides unbiased assumptions of how economic activity will increase in older age groups over the next 25 years. However it should be noted that a more recent (November 2014) paper is available and this should be used in preference to the October 2011 edition.
- 4.46 The SHENA also undertakes a sensitivity test of economic activity which incorporates assumptions from Experian's Report 'Employment Activity and the Ageing Population' which has the effect of increasing economic activity of women in line with past trends from 1981, along with significantly increase economic activity for older people.
- 4.47 The commuting ratio is the final assumption which can have a significant effect on economic-led housing need. GVA's approach is to use the 2011 Census ratio of 1.28, and for this to remain static over the Plan period. This is considered a robust approach to apply.
- 4.48 The SHENA considered three economic scenarios but only presented the results of two – the Sector Based Growth scenario and the Sector Based & London Paramount Indirect Scenario. Housing need to support both economic scenarios increases above the baseline demographic needs (1,179 dwellings per annum as indicated by the mid-point of the two long-term migration trends) if KCC economic activity rates are applied; to support the Sector Based Growth scenario 1,197 dwellings per annum are required and to support the London Paramount Indirect scenario a total of 1,213 dwellings per annum are required.
- 4.49 If Experian's economic activity rates are applied, housing need to support both economic scenarios is below the baseline demographic need (1,020 dpa required to support Sector Growth scenario and 1,036 dpa to support the London Paramount scenario).

¹² Stage 1 of the Examination of the South Worcestershire Development Plan; Inspector's Further Interim Conclusions on the Outstanding Stage 1 Matters, 31 March 2014

- 4.50 It is important to note that the level of housing need identified from both economic scenarios and both economic sensitivity tests, is below the 'starting point' estimate of 1,270 households/1,317 dwellings per annum (2012-2037) as indicated by the CLG 2012-based household projections.

v) **Market signals adjustment**

- 4.51 The GVA report provides a summary of median **house price** increases in Medway between 2000 and 2013. The source used by GVA in obtaining this information (CLG) is considered robust. As GVA summarise, between 2000 and 2013, values in Medway increased by 128.6%; the second fastest rate observed out of seven authorities analysed. The rate also exceeded inflation in the south east region as a whole (96%).¹³
- 4.52 The SHENA's summary of rental prices shows a significant worsening in the lower quartile **rental prices** in Medway. Over the short period analysed (2010-2014), lower quartile rents increased by 10%; the second highest of the seven authorities analysed. This represents an increase of double that experienced in the south east region (4.3%), and triple the increase across England (3.3%). There is a clear affordability problem in respect of lower quartile rents in Medway when compared to surrounding areas.
- 4.53 The change in the **affordability ratio** is often the most crucial of market signals indicators, and the GVA report provides a summary of the lower quartile and median affordability ratios in Medway, compared to seven Kent authorities, the south east region, and nationally. The GVA report highlights how the lower quartile affordability ratio in Medway had increased by 65% between 2000 and 2013, and that this increase represents a more acute increase than the region (51%) and nationally (65%).¹⁴ This highlights how affordability has significantly worsened in Medway over the thirteen years analysed.
- 4.54 This study (section 3) identifies how household formation is suppressed in the 25-34 age group in the most recent 2012-based CLG household projections. The result of assuming the formation rates as published, and planning for growth based on them, will be a failure to address the significant increase in **concealed households** in Medway between the 2001 and 2011 Censuses. This increase across the country has been due to the significant worsening affordability of housing, leading to two or more adult households living with one another rather than forming their own households.

¹³ Paragraph 5.90, SHENA

¹⁴ Paragraph 5.97, SHENA

- 4.55 This trend is evidenced in Medway by the 68% increase in concealed households between the 2001 and 2011 Census'. This is broadly comparable to the regional and national averages (71%) although the SHENA states that concealment is not deemed to be worsening at a significant rate. However, the rate of increase in Medway is higher than in Canterbury (66%), Sevenoaks (56%), and Tonbridge and Malling (54%).
- 4.56 Furthermore the SHENA acknowledges a 13.03% increase in concealed households in the under 25 age group (13%). This is higher than the national average (12.76%) and several other Kent local authorities (Canterbury, Dartford, Maidstone, and Swale).¹⁵ Despite this, the SHENA concludes that the market signals information in respect of concealed families does not provide strong evidence of supplied pressures in Medway¹⁶. Barton Willmore disagree and a response in establishing the OAN for Medway is needed to alleviate this worsening trend.
- 4.57 The **rate of development** is also considered as a market signal, with the PPG stating how future supply should be increased to reflect the likely under-delivery of a Plan, if the rate of development has been lower than the planned number. A meaningful period must be assessed in line with PPG, and as this study has shown (Chapter 3), delivery in Medway has been 20% lower than the planned number over the past 10 years.
- 4.58 The GVA report also identifies this lack of delivery, but over the intercensal period (2001-2011) rather than the last 10 years considered in this study (2005-2014). Notwithstanding this difference, GVA identify growth in Medway's housing stock of 7.3%; lower than the sub-regional, regional, and national averages. Furthermore GVA identify how completions have exceeded planned targets in only three of the 12-year period between 2001/02 and 2012/13¹⁷.
- 4.59 In summary, it is important to note the PPG, which states the following in respect of market signals:

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings."¹⁸

"Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections."¹⁹ (Our emphasis)

¹⁵ Table 5.1, SHENA

¹⁶ Paragraph 5.108, SHENA

¹⁷ Paragraph 5.118, SHENA

¹⁸ ID2a-019, Housing and Economic Development Needs Assessments, PPG

¹⁹ ID2a-020, Housing and Economic Development Needs Assessments, PPG

- 4.60 In the context of the PPG, and the analysis set out by GVA, it is clear that an upward adjustment to the CLG household projection for Medway is required. Failure to do so will only serve to exacerbate the conditions which have led to the affordability problems experienced in Medway over the past 10 to 15 years.
- 4.61 The PPG does not quantify the market signals uplift, other than to say how “planmakers should set this adjustment at a level that is reasonable” and “on reasonable assumptions could be expected to improve affordability.”²⁰ Local Plan Examination decisions are the only source in which market signals adjustments have been quantified. At the Eastleigh Local Plan Examination, the Inspector recommended a 10% uplift to demographic-led projections in order to alleviate market pressure considered as “modest”. This level of uplift was considered “cautious” by the Inspector.²¹ The same level of uplift was also considered applicable by the Uttlesford Local Plan Inspector.
- 4.62 An equally cautious uplift of 10% to the 2012-based CLG household projection in Medway would result in an increase to at least **1,456 dwellings per annum**.
- 4.63 The SHENA considers the level of uplift the economic-led scenarios with KCC economic activity rates applied would make to the baseline demographic level of need (mid-point between the two long term migration trends). This is presented as between a 1.5% and 2.9% uplift which is not considered sufficient to respond to the local market signals.²² Barton Willmore agree.
- 4.64 As an alternative, the SHENA also considers the level of uplift the CLG 2012-based household projections, updated to take account of the 2013 and 2014 MYPE, provides to the mid-point of the two long-term migration trends. This is presented as being equivalent to an 8.6%, which the SHENA considers a significant uplift.²³
- 4.65 On this basis the **SHENA concludes on OAN for Medway of 1,281 dwellings per annum** (2012-2037) as indicated by the CLG 2012-based household projections updated to take account of the 2013 and 2014 MYPE.
- 4.66 Barton Willmore do not consider the market signals uplift applied in the SHENA to be sufficient. The SHENA’s ‘uplift’ is applied to the SHENA’s long-term migration trend which is already below the starting point estimate according to PPG. Therefore even applying the market signals ‘uplift’ results in OAN that is still below the starting point estimate (1,281 dpa compared to 1,323 dpa).

²⁰ ID2a-020, Housing and Economic Development Needs Assessments, PPG

²¹ Paragraphs 39-41, Eastleigh Borough Local Plan, Inspector’s Report, February 2015

²² Paragraph 5.129, SHENA

²³ Paragraph 5.130, SHENA

vi) Affordable housing need

- 4.67 As stated in the NPPF, LPAs are required to ensure their local plans meet OAN for both market and affordable housing. The *Satnam v Warrington BC* High Court Judgment provides useful guidance on the proper exercise that needs to be undertaken to assess affordable need as part of OAN. That is:

“(a) having identified OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes; (our emphasis)

(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPG, paragraphs 14 and 47.”²⁴

- 4.68 The *ELM Park v Kings Lynn and West Norfolk BC* High Court Judgment (July 2015) provides a more recent judgement on the role of affordable housing need within OAN, determining that affordable need did not have to be met in full when determining OAN but rather:

“This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA “addresses” these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area.”²⁵

- 4.69 It is therefore clear that where there is significant affordable housing need, although it is not required to be met in full, an increase should be considered.

- 4.70 In the context of this, the Council’s draft Plan states the following in respect of affordable housing need in Medway:

“The Strategic Housing Market Assessment (SHMA) carried out in 2015 for Medway identified a high level of demand for affordable housing, at 17,112 over the plan period. The Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial analysis indicates that a percentage of 25 % affordable housing would be deliverable on developments of over 15 units, taking into account land values and development costs.”²⁶ (our emphasis)

²⁴ Paragraph 43 (iv) (a) and (b), High Court Judgement CO/4055/2014, *Satnam Millennium Limited v Warrington Borough Council*, 19/02/2015

²⁵ Paragraph 33, page 11, High Court Judgement CO/914/2015, *Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government*, *ELM Park Holdings Ltd*, 09/07/2015

²⁶ Paragraph 7.12, page 21, Medway Council Issues and Options Consultation Document, January/February 2016

- 4.71 This is a significant level of affordable housing need, equating to 744 affordable dwellings per annum. To deliver this level of affordable housing in full, at provision of 25%, would require full OAN of circa 3,000 dwellings per annum, 2012-2035. It is accepted that 3,000 dwellings per annum is unrealistic, but a figure in excess of the Council's existing target would help to meet some of this affordable need.

vii) Summary

- 4.72 In summary, the SHENA identifies OAN for Medway as being 1,281 dwellings per annum over the period 2012-2037 based on the results of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates.
- 4.73 This level of housing need has been taken forward in the draft Local Plan to represent need over the period 2012-2035.
- 4.74 OAN of 1,281 dwellings per annum is not considered to represent full OAN for Medway over the plan period (2012-2035) for the following reasons:
- There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dwellings per annum, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The GVA SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
 - The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;

- The GVA SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The GVA SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The GVA SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 2.5%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet a affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 This review of the Strategic Housing and Economic Needs Assessment (SHENA) has considered the objectively assessed need (OAN) for housing over the period 2012-2037 which has been taken forward in the Medway Council Plan Issues and Options document which is planning for housing needs over the period 2012-2035. **Full OAN is presented in as being 1,281 dwellings per annum over the period 2012-2035.**
- 5.2 In short it is considered the OAN presented in the SHENA plans for very low levels of demographic growth over the Plan period, and does not represent a positively prepared OAN. From the outset, it is important to note how the level of OAN presented in the SHENA is below the PPG's starting point estimate of need – the latest CLG household projection (1,323 dpa, 2012-2035).
- 5.3 The SHENA's OAN conclusion is underpinned by applying 2012-based household formation rates to their preferred population projection (a revised 2012-based ONS SNPP scenario to reflect 2013 and 2014 ONS Mid-Year Population estimates). The 2012-based CLG household projection projects suppressed household formation for those aged 25-44 years of age; those most likely to represent concealed households and first time buyers. Barton Willmore consider it necessary to apply an adjustment to address this suppression and positively prepare the Local Plan, an exercise which has not been undertaken in the SHENA. This approach is supported by recent Planning Inspectorate decisions, which note continuing suppression in the 2012-based CLG projections.²⁷
- 5.4 Notwithstanding that the starting point estimate of OAN (1,323 dpa, 2012-2035) is higher than the Council's proposed level of provision, the starting point estimate should be considered a very minimum for a number of reasons.
- 5.5 The 2012-based CLG household projection is underpinned by the 2012-based Sub National Population Projections (SNPP) which assume very low net international migration to the UK (165,000 people per annum) compared with more recent trends (336,000 people in the last recorded year), an assumption which filters down to local authority level and has been identified by recent Local Plan Inspector's decisions²⁸. PAS Guidance also identifies how the net migration of the 2012-based ONS SNPP may well be an underestimate²⁹.

²⁷ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁸ Paragraph 1.12, page 3, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁹ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

- 5.6 Furthermore, analysis of migration trends has identified that the net migration assumptions of the 2012-based SNPP (840 net migrants per annum, 2012-2037) is low in the context of a more recent 5-year trend given that net migration to Medway has increased over recent years.
- 5.7 However, because it cannot be said with any certainty whether Medway is experiencing a reversal of trend in respect of migration, it is considered reasonable to use the 2012-based SNPP as the most appropriate demographic population projection at this point in time. However, if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase then it would be considered appropriate to change this approach.
- 5.8 With the above points in mind, it is considered that the 2012-based SNPP should provide the very minimum projection of population growth in Medway.
- 5.9 The approach to assessing an uplift for economic growth is considered to be broadly sound. However it is considered that the use of only one forecast is a weak approach. Given the fluctuation of job growth forecasts, Barton Willmore would recommend an average of the three leading forecasting houses; Experian Economics, Cambridge Econometrics, and Oxford Economics. This approach was endorsed by the South Worcestershire Local Plan Inspector.
- 5.10 The SHENA does not suggest a direct uplift to account for worsening market signals. The SHENA acknowledges that some market signals in Medway have worsened to a greater extent than neighbouring local authorities, the south east region, and the national average. The PPG states that an upward adjustment to the demographic starting point should be applied in the event that any of the market signals indicators show a worsening trend. The SHENA considers the level of uplift the economic scenarios provide to be insufficient, however, the 8.6% uplift provided by the CLG 2012-based household projections (adjusted to take account of the 2013 and 2014 MYPE) is considered by the SHENA to provide a significant uplift.
- 5.11 Barton Willmore do not agree. The level of uplift considered by the SHENA is considered in the context of a baseline demographic level of need that is already 10% below the starting point estimate (1,136 compared to 1,270 households per annum) over the period 2012-2037. In effect, the uplift considered by the SHENA still falls below the starting point estimate of need as indicated by the CLG 2012-based household projections, and which Barton Willmore consider to provide a conservative projection of future housing need.
- 5.12 The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local

Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

Way Forward

- 5.13 The PPG states how the OAN should be an unconstrained assessment. The SHENA's approach to OAN is not considered to comply with the PPG in this regard, and sets an OAN below the PPG's starting point estimate. Adjustments for household formation suppression, more recent migration trends, worsening market signals, and affordable housing need indicate a requirement for OAN significantly higher than the starting point estimate of OAN, 1,323 dwellings per annum (2012-2035). The OAN suggested by the SHENA is considered to be wholly inappropriate and not positively prepared, as required by paragraph 182 of the NPPF.

APPENDIX C

**OBJECTIVE ASSESSED HOUSING NEED: DASHBOARD
(BARTON WILLMORE, FEBRUARY 2016)**

Objectively Assessed Housing Need

Medway Unitary Authority

February 2016 (updated)



Introduction

Planning Practice Guidance (PPG) on Housing and Economic Development Needs Assessments (26 March 2015) outlines the methodology for assessing housing need in the housing market area. The assessment should be an objective and unconstrained assessment based on facts and unbiased evidence.

This report summarises objectively assessed housing need for [Medway Unitary Authority](#). Although there are links with Greater London, it is considered pragmatic to consider Medway Borough as a District-wide HMA.

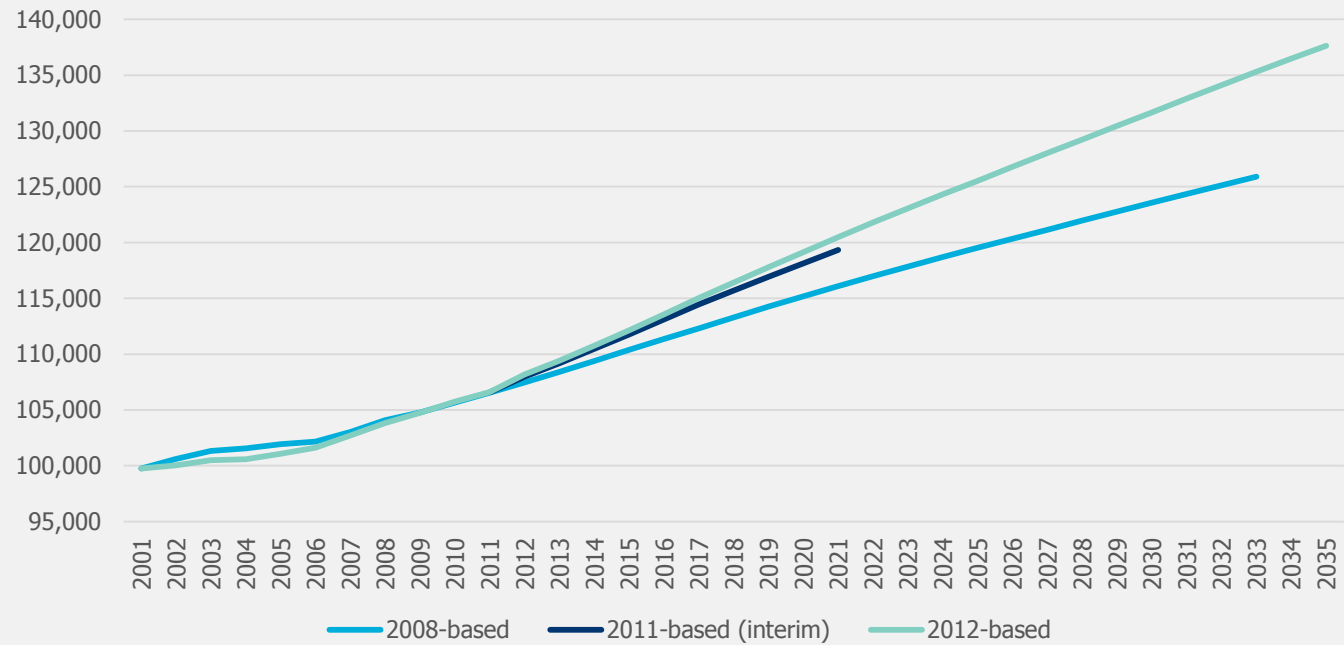
OAN Methodology

Following PPG, Barton Willmore's approach to assessing housing need is as follows.

1. Identify the [starting point estimate](#) of need and apply [demographic adjustments](#) to address household suppression and/ or to test alternative migration trends
2. Assess the labour force capacity of the demographic assessment and, if necessary, apply an uplift to support [job growth](#) in line with current forecasts and/ or past trends
3. Analyse [market signals](#) identified by PPG as; land prices, house prices, private rents, affordability, rate of development and overcrowding. A worsening trend in any of these indicators will require an upward adjustment to planned housing numbers
4. Establish whether the modelled housing need would meet [affordable housing need](#) or whether any further adjustment is necessary

This report provides a streamlined summary of these key issues. Further detail on modelling assumptions can be found the in accompanying Barton Willmore OAN Methodology statement.

CLG Household Projections: Medway

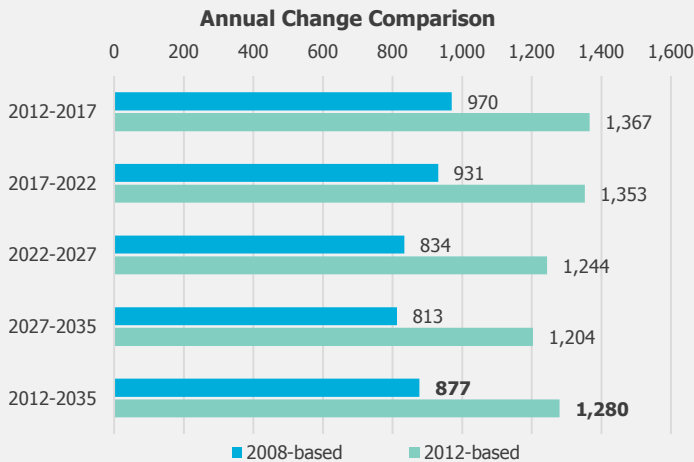


Household projections published by the Department for Communities and Local Government (CLG) should provide the starting point estimate of overall housing need.

The most recent series are the 2012-based household projections published on 27 February 2015. These project growth of **1,280 households per annum** in Medway over the period 2012-2035. Once an allowance for vacancy and second homes has been applied (3.3%) this equates to growth of **1,324 dwellings per annum**.

The 2012-based CLG projection projects a significantly higher level of household growth than the previous full projection (2008-based series) despite the falling levels of household formation projected in the 25-44 age group (see household formation opposite).

This suggests that household growth in Medway is largely being driven by higher population growth experienced in the area in recent years.

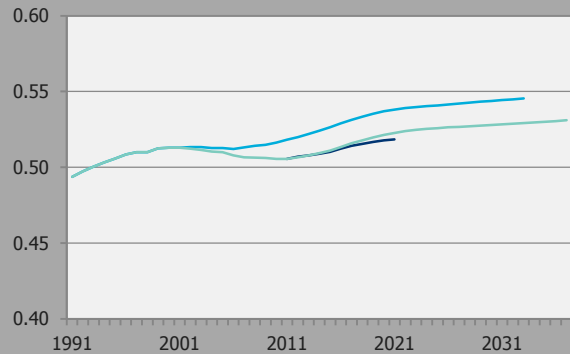


Source: Communities and Local Government (CLG) Household Projections

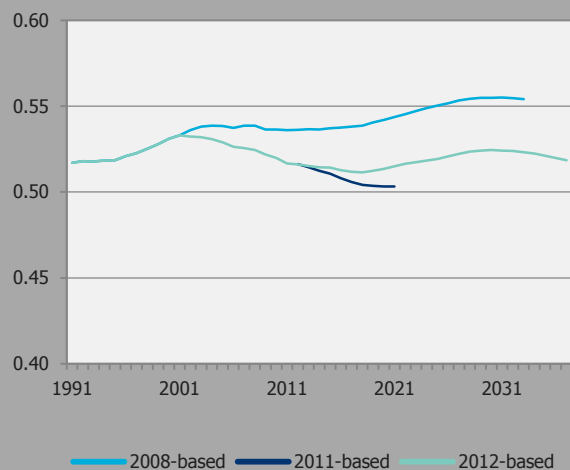
Suppressed Household Formation

The likelihood that a person of a certain age and gender to 'head' a household (household formation rate) is lower in some age groups in the 2012-based household projections compared to previous series. This suggests that the 2012 rates suppress household formation, particularly for younger people aged 25-34 and 35-44 years, in Medway. These are the groups who found it the most difficult to enter the housing market during and after the recession. An adjustment to the 2012 household formation rates in the 25-44 age group is required to address this issue.

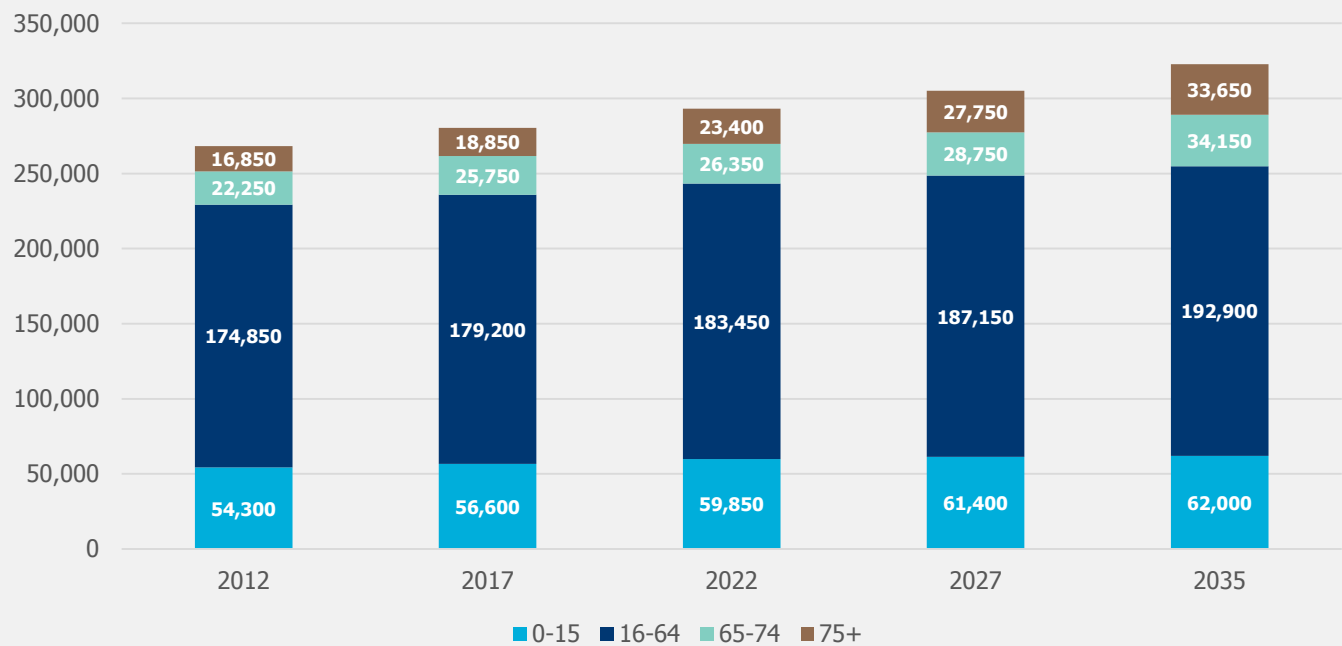
Household Formation Rates: All Ages (15+)



Household Formation Rates: Aged 25-44



ONS 2012-based Population Projections: Medway

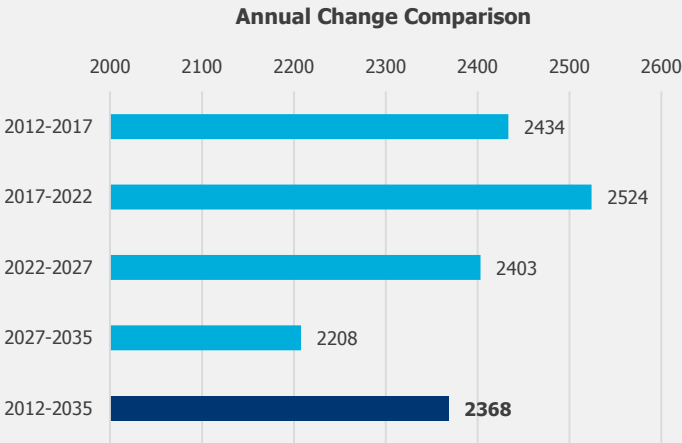


The 2012-based Sub National Population Projections (SNPP) project Medway’s population to increase by an **additional 2,368 people per annum** over the period 2012-2035.

This is broadly comparable to the previous interim 2011-based ONS SNPP (circa 2,500 people per annum, 2011-2021), but significantly higher than the pre-recessionary 2008-based series (circa 1,370 people per annum).

At a national level the 2012-based ONS SNPP are considered a conservative projection, being underpinned by 165,000 net international migrants per annum projected between 2012 and 2037. This compares with over double this assumption (336,000 people per annum) being recorded in the most recent year (ending June 2015).

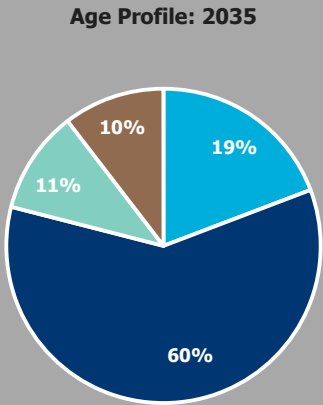
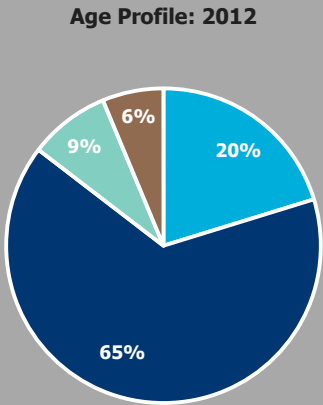
For this reason, flexibility for higher population growth in Medway than projected by the 2012-based ONS SNPP and the 2012-based CLG household projection is required, to ensure a significant underestimate is not assumed. If net-migration trends justify an upward adjustment to the 2012-based ONS SNPP, the PPG makes provision for this (see next slide).



Source: Office for National Statistics (ONS) Sub National Population Projections

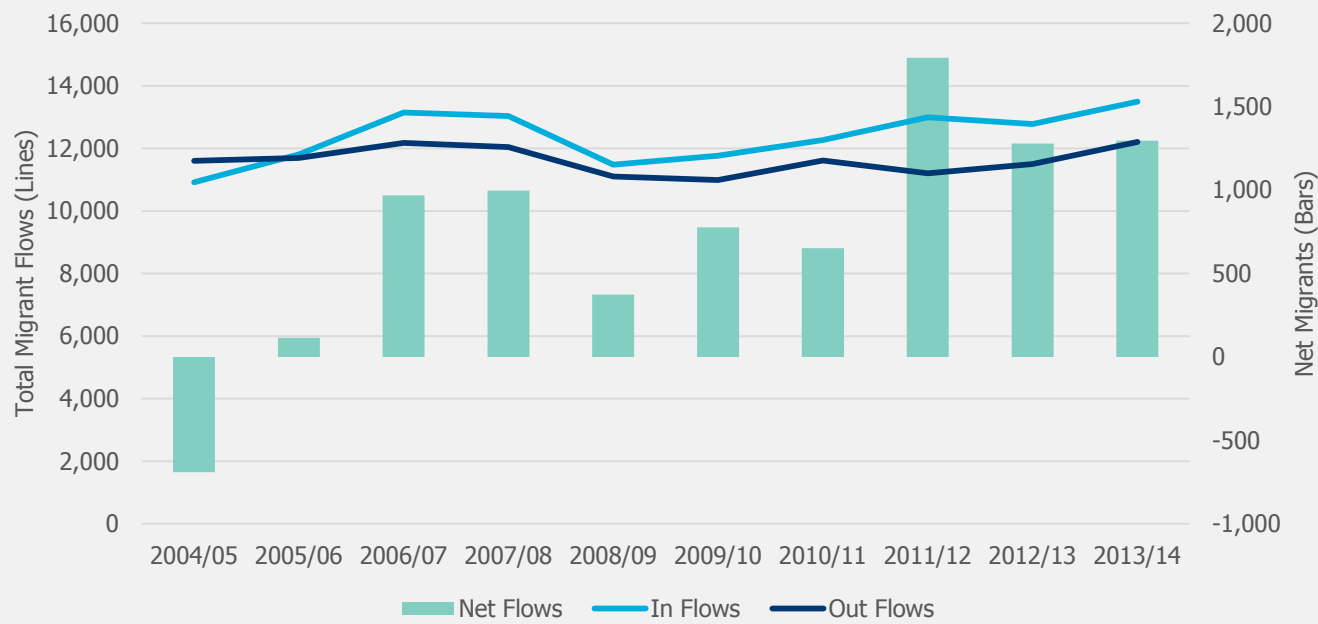
The Ageing Population

Over the Plan Period, the age profile of Medway is projected to change significantly. By 2035, the over 65 population will have increased by 6%. Left unchecked, the relative decline of prime working age (16-64) population will have an adverse effect on future economic competitiveness and productivity.



0-15 16-64 65-74 75+

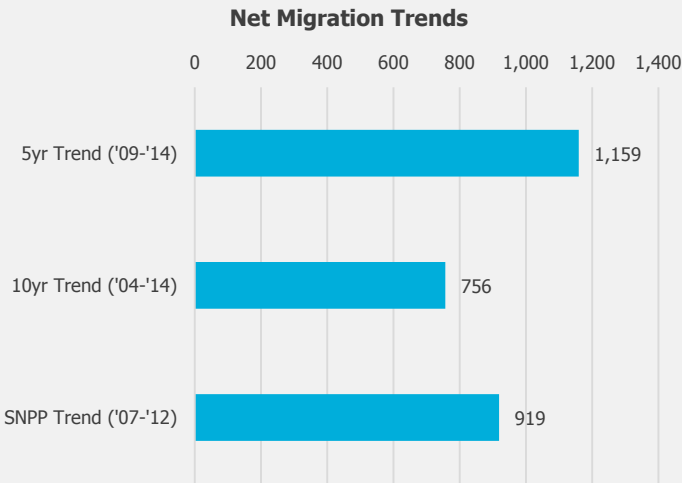
Migration Flows: Medway



Over the past decade there have been higher in flows than out flows of people moving to Medway, resulting in significant net in-migration to the Borough. Net in-migration fell sharply between 2008/09 and 2010/11 following the onset of the recession, but since 2011/12 has increased to between 1,280 and 1,793 people per annum.

Notwithstanding the most recent 5-year (2009-2014) trend incorporating the end of the recessionary period, the average has been for net in-migration of 1,159 people per annum. This exceeds the 10-year trend (756 people per annum) and the trend over the period 2007-2012 (919 people per annum) which underpins the 2012-based SNPP.

Despite net migration increasing significantly in the last three years, it cannot be certain whether this increase will continue. On this basis, it is considered that the 2012-based SNPP provide a reasonable demographic projection for Medway at this point in time but that the projection should be considered a very minimum and that if subsequent data releases show net migration to Medway continually increasing then the demographic assessment should be adjusted to reflect this.

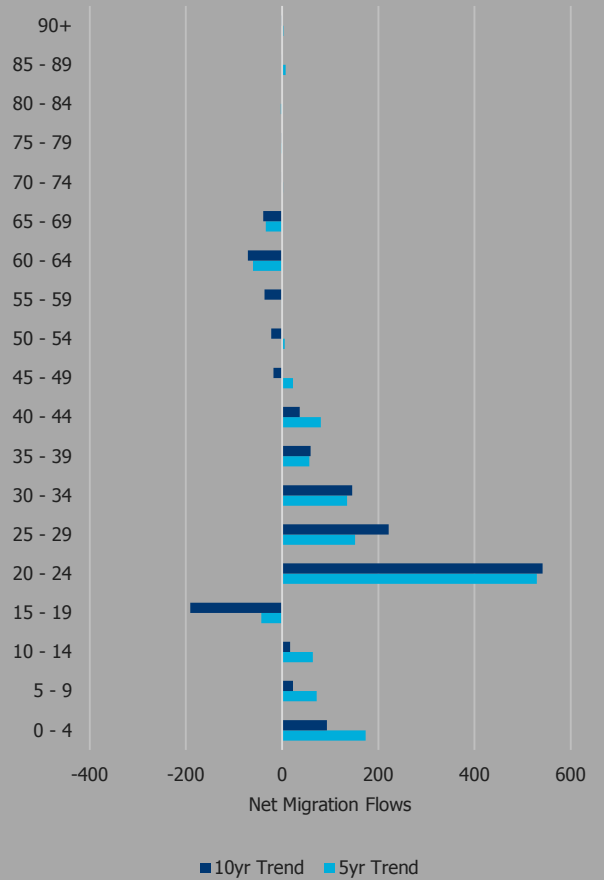


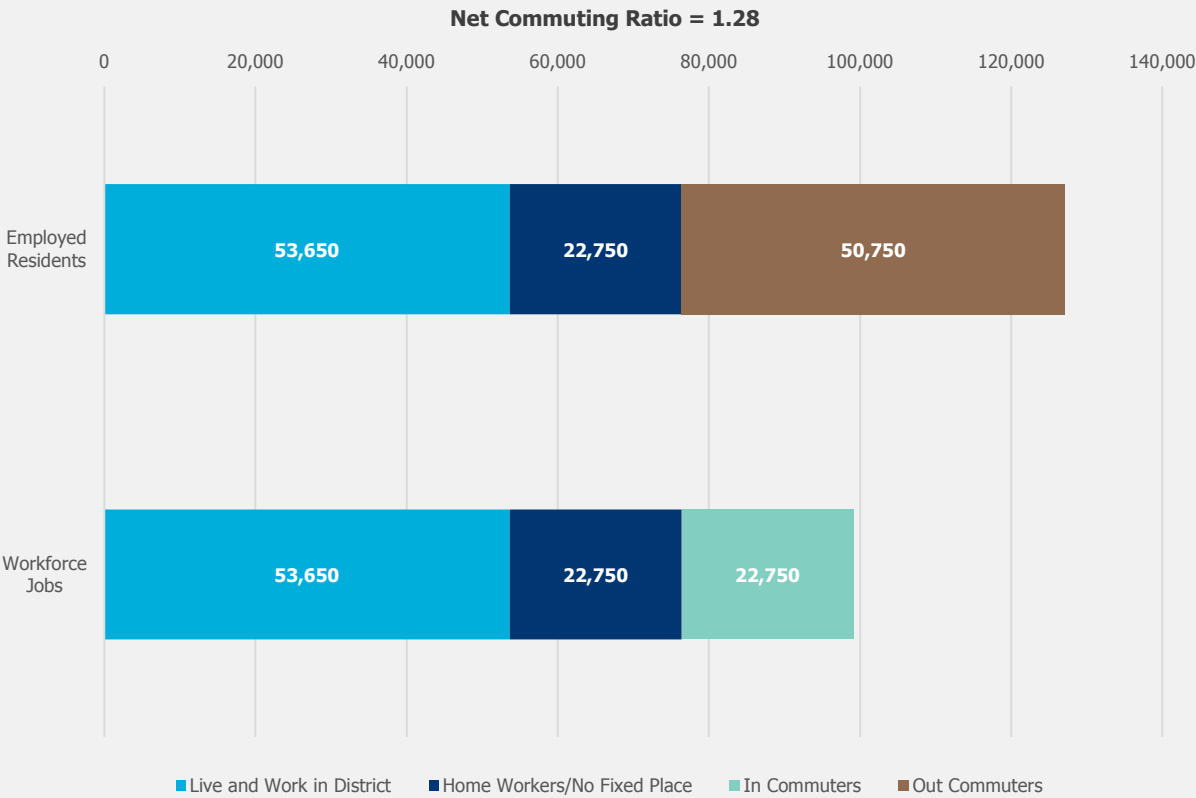
Source: Office for National Statistics (ONS) Components of Population Change

Age Profile of Migrants

Net migrants to Medway tend to be younger families who are of working age. Encouraging net migration will therefore counter the naturally ageing population of Medway. Without net migration the working age population of Medway will fall significantly over the plan period. To support economic growth in Medway the resident labour supply needs to increase to support past trends and forecasts of job growth.

Net Migration by Age Group





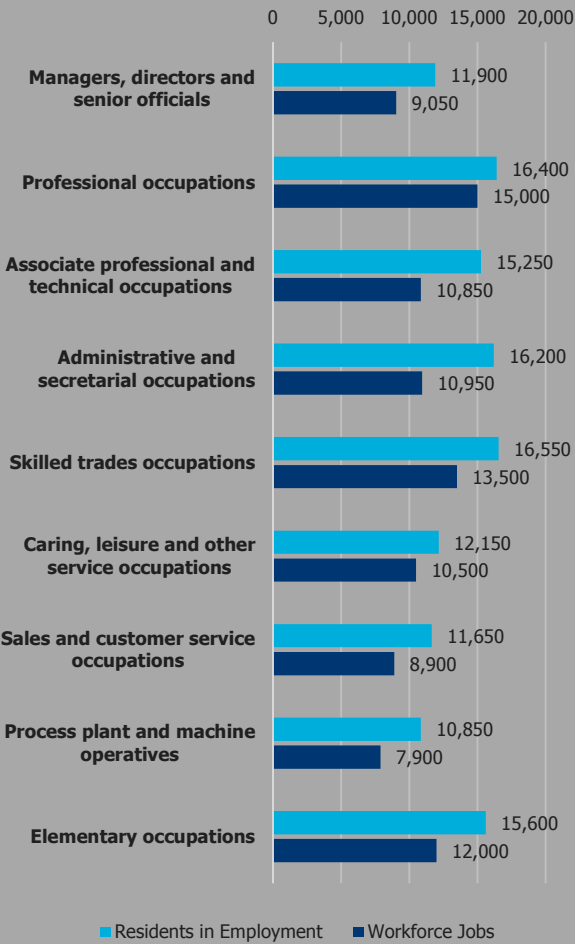
Within Medway there is a greater number of residents in employment compared to the number of jobs which means that Medway exports labour. This results in a commuting ratio of 1.28.

The commuting ratio is of importance in determining the number of people required to move into an area to generate labour force and fill jobs. The commuting ratio may change over the Medway Plan period (2012-2035), and this could require more or less workers. However for the purposes of demographic modelling and objectively assessing need, the commuting ratio is maintained at 2011 Census levels to ensure the objective assessment of need is unconstrained and 'policy off'.

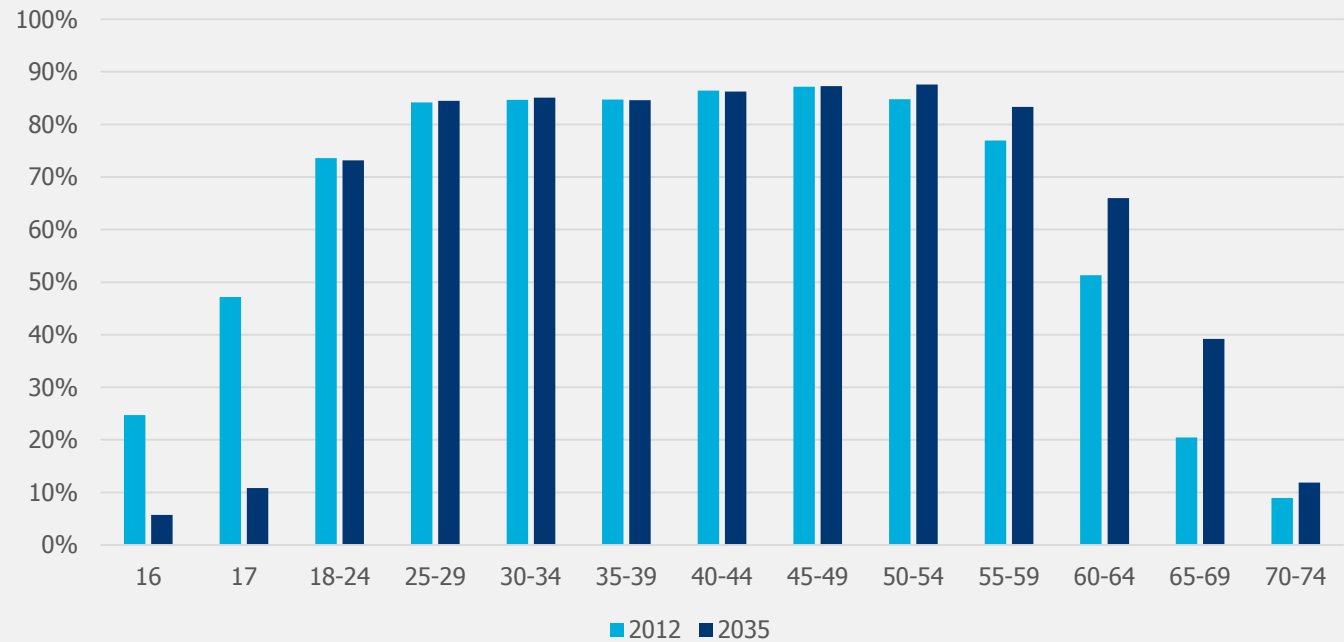
In the case of Medway, for every 100 jobs created, 128 economically active (labour force) people will be required.

Commuter Flows by Occupation

The data in this table shows how there is a net outflow of residents in employment in all occupations in Medway Borough. Professional and skilled occupations employ the largest numbers of people, both within the Borough and outside. Manual occupations employ the lowest numbers.



Economic Activity Rate Projections: Medway



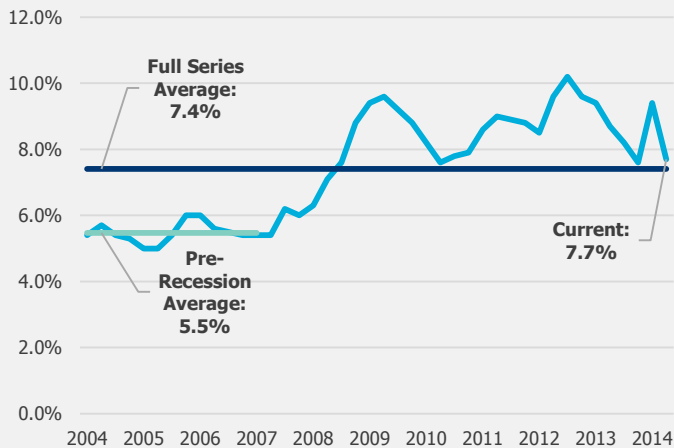
Economic activity rates measure, for a given age and gender band, the proportion of the population who are likely to be available for work.

The extension of State Pension Age (SPA) and the effective abolition of age-related retirement will increase the activity rates among the older age bands. In contrast, the extension of compulsory education to the age of 18 will reduce the activity rates of 16 and 17 year olds.

Activity rates are applied to the population projection to calculate the economically active population (resident labour supply) and therefore even where rates are held constant, an increase in the population will result in an increase in the resident labour supply. The graph above illustrates how the economic activity will increase over the Plan period.

Unemployment rates increased in Medway during the recession. In late 2009 the **unemployment rate peaked at 9.6%**. Barton Willmore's assessment assumes that unemployment will return to the **pre-recession average of 5.5%** by 2021 and remain constant thereafter.

Medway Unemployment Rates - APS

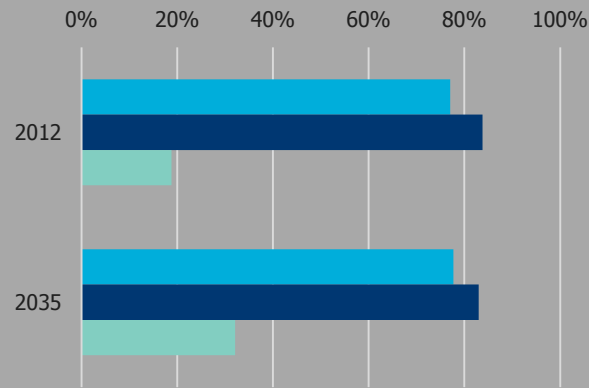


Source: ONS, 2011 Census Economic Activity projected using Kent County Council Activity Rate Forecasts to 2036, November 2014
ONS, Annual Population Survey Model Based Estimates of Unemployment

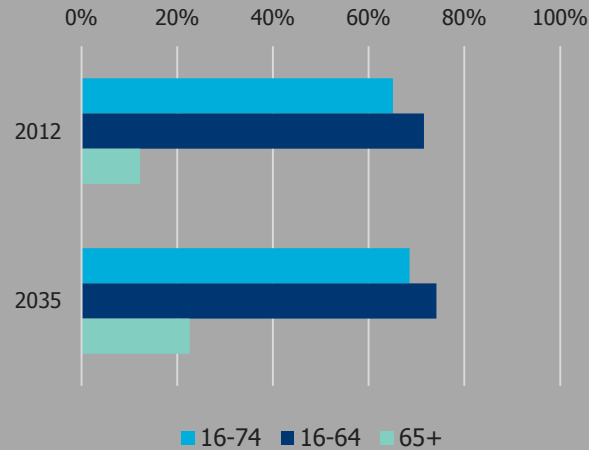
Male and Female Economic Activity

Economic activity rates are generally higher for males than females. However, between 2001 and 2011, female activity rates increased more rapidly than males as a result of increased participation of females in the labour market. Projections assume this pattern will continue. However, female rates are still expected to remain lower than males. The extension and equalisation of male and female SPA will increase future economic activity rates for both males and females aged 65+.

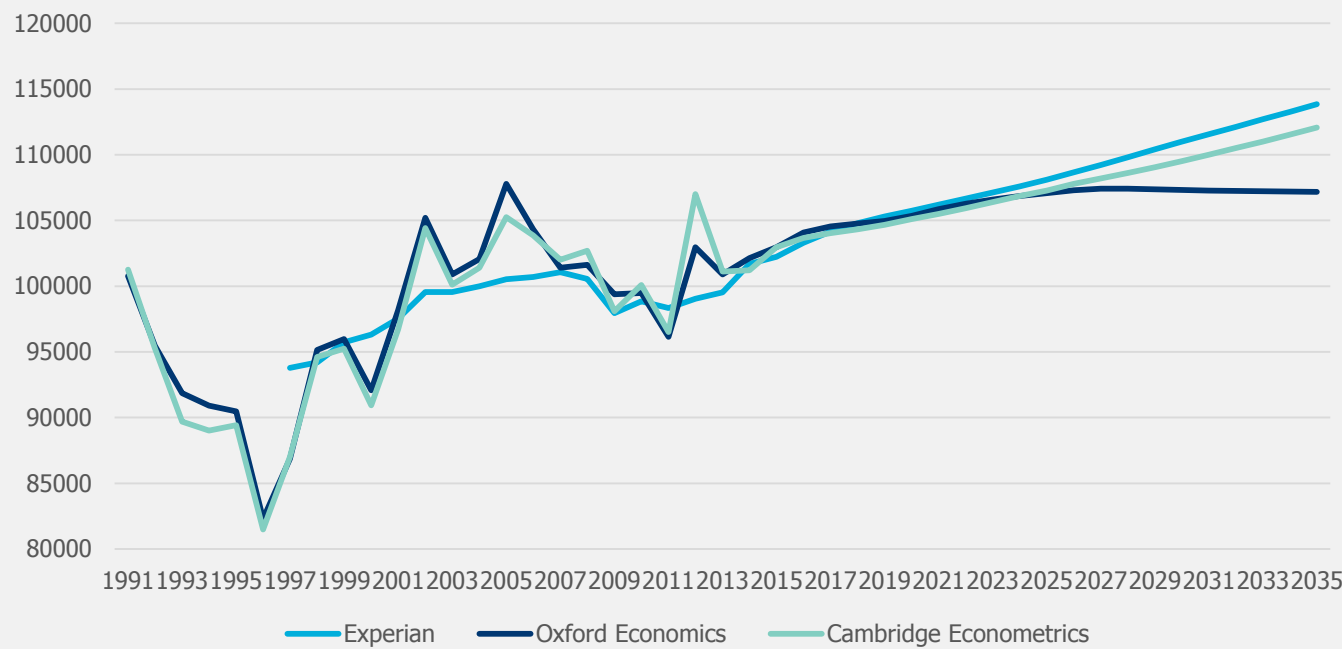
Male activity rate projections



Female activity rate projections



Workforce Job Growth: Medway

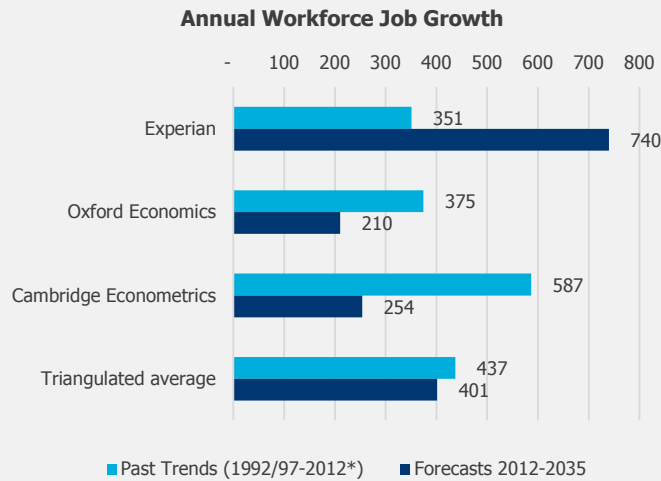


The PPG (paragraph ID2a-018) states how employment forecasts and trends must be taken into account when establishing unconstrained OAN.

In this context Barton Willmore has obtained the most recent job growth forecasts from the leading three forecasting houses (Experian Economics, Cambridge Econometrics, and Oxford Economics). The three sources provide past trends alongside the forecasts for the period being assessed here (2012-2035).

The average forecast job growth for the Plan period is 401 jobs per annum. This follows a broadly similar trajectory to the average past trends recorded by the three forecasting houses (437 jobs per annum, 1992/97-2012).

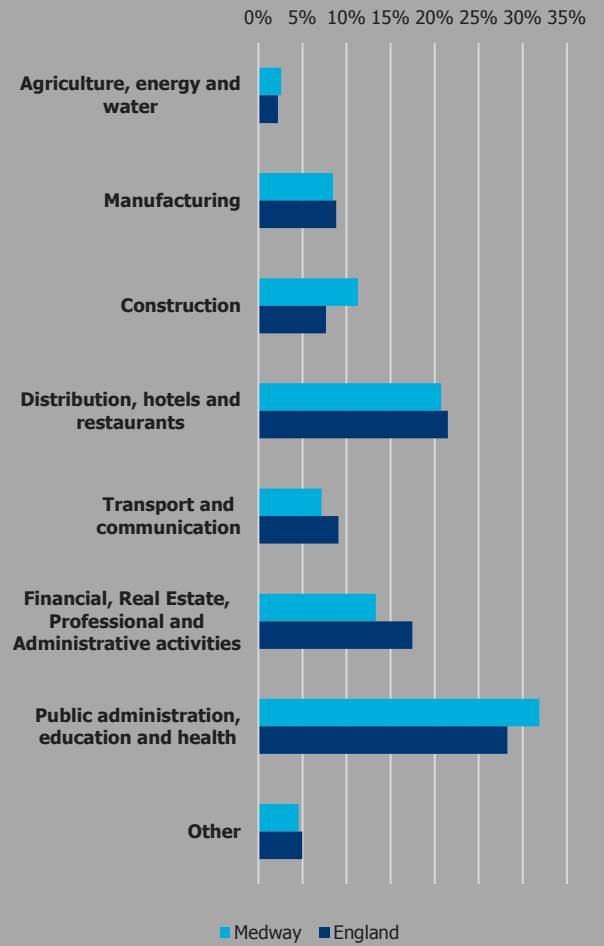
The demographic forecasting undertaken in this assessment therefore establishes the level of housing growth required to support job growth of 401 jobs per annum in Medway.



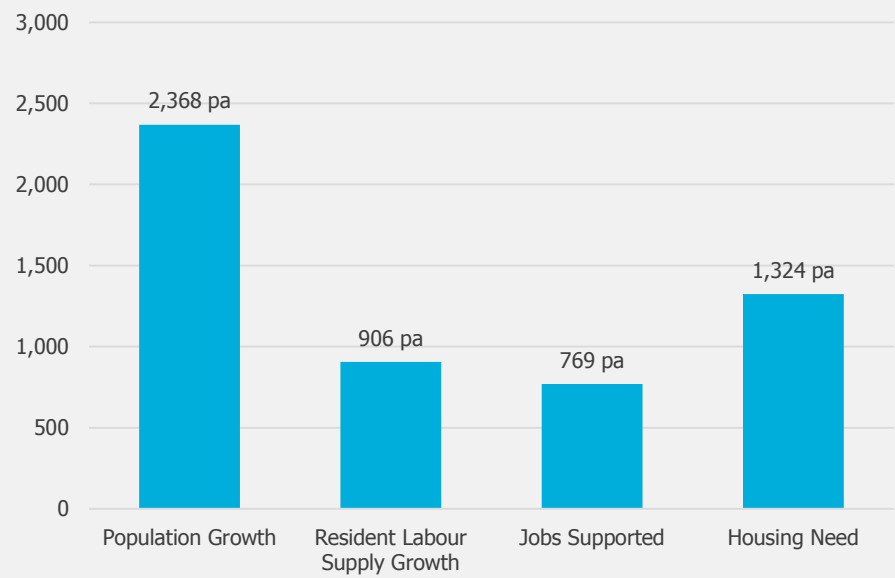
Source: Experian Economics, Oxford Economics, Cambridge Econometrics

Key Industrial Sectors

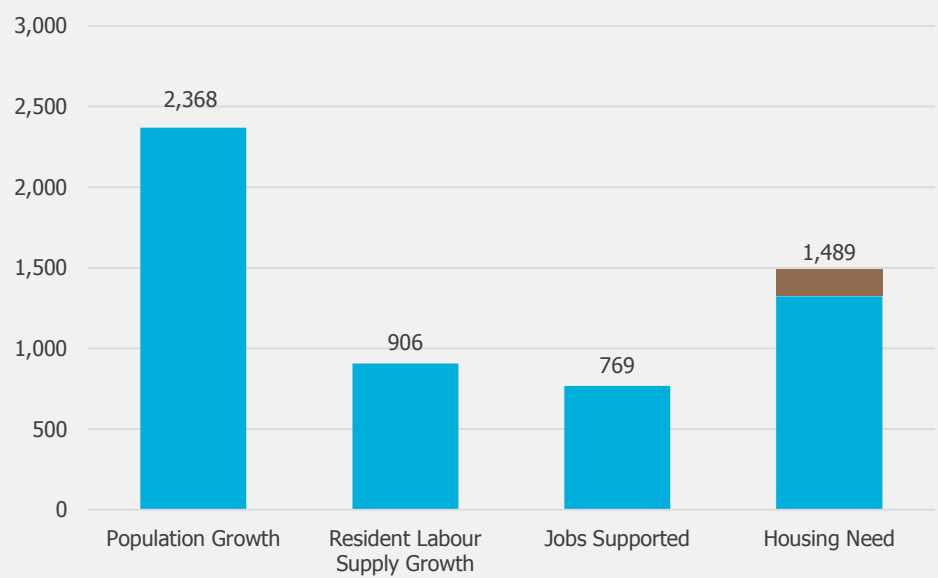
Medway's employment base is diverse with people who work in Medway working in a wide range of industries. The industrial sector which employs the most people is the Public administration, education and health sector (32%) followed by Distribution, hotels, and restaurants (21%). These two sectors account for over 50%.



Starting Point



Household Formation Adjustment



■ Starting Point ■ HFR adjustment

The PPG’s ‘Starting Point’ scenario is a reflection of the CLG 2012-based Household Projection series, with adjustments made to convert household change into housing need (by applying adjustments for vacant and second homes). In Medway this adjustment rate is 3.3% and the unadjusted dwelling requirement would be **1,324 dpa, 2012-2035**.

This starting point would provide for the policy off average job growth forecast (401 jobs per annum) we set out on page 8.

However this is the **starting point estimate only**. To comply with the requirements of PPG, consideration of the underlying household formation rates and migration assumptions underpinning this starting point need to be considered. Adjustment should then be made if local circumstances dictate.

The starting point estimate of need (1,324 dpa) is considered to be underpinned by suppression in household formation in the 25-44 age group in Medway. PPG ID2a-015 states how sensitivity testing can be undertaken, specific to local circumstances, and in this context an adjustment to the starting point has been made. This complies with the NPPF requirement to ensure Plans are positively prepared.

The above graph shows how a blended approach to household formation rates would alter the OAN starting point. This blended approach is as follows; all ages with the exception of the 25-44 age group are underpinned by the household formation rates of the starting point. However in the 25-44 age group we have applied a return to the pre-recessionary 2008-based household formation rates by the end of the Plan period (2035). This will help to alleviate the clear suppression in household formation in this age group.

This adjustment results in an **increase to 1,489 dpa, 2012-2035**. This is considered to represent full OAN for Medway.

The PPG states how an adjustment to the demographic projection can also be considered. Barton Willmore’s analysis of migration trends has identified that net migration to Medway has increased in the last three years. However, we cannot be certain whether this is a reversal of trend. Until more sufficient data is available, it is considered appropriate to plan on the basis on the 2012-based SNPP. Nonetheless it is considered that the 2012-based SNPP should provide the very minimum level of future population growth in Medway given the low international migration assumptions they are underpinned by. However, if subsequent releases of Mid-Year Population Estimates provide evidence that migration to Medway is continuing to increase, then the approach to OAN may require modification.

The affordability ratio measures the ratio between lower quartile house prices and lower quartile earnings. The chart to the right tracks the affordability ratio in Medway between 1999 and 2013 based on a three year rolling average.

Although Medway is lower than the average for the south east region, in 2013 lower quartile house prices remained 6.6 times lower quartile earnings. House prices are therefore unaffordable for most first time buyers.

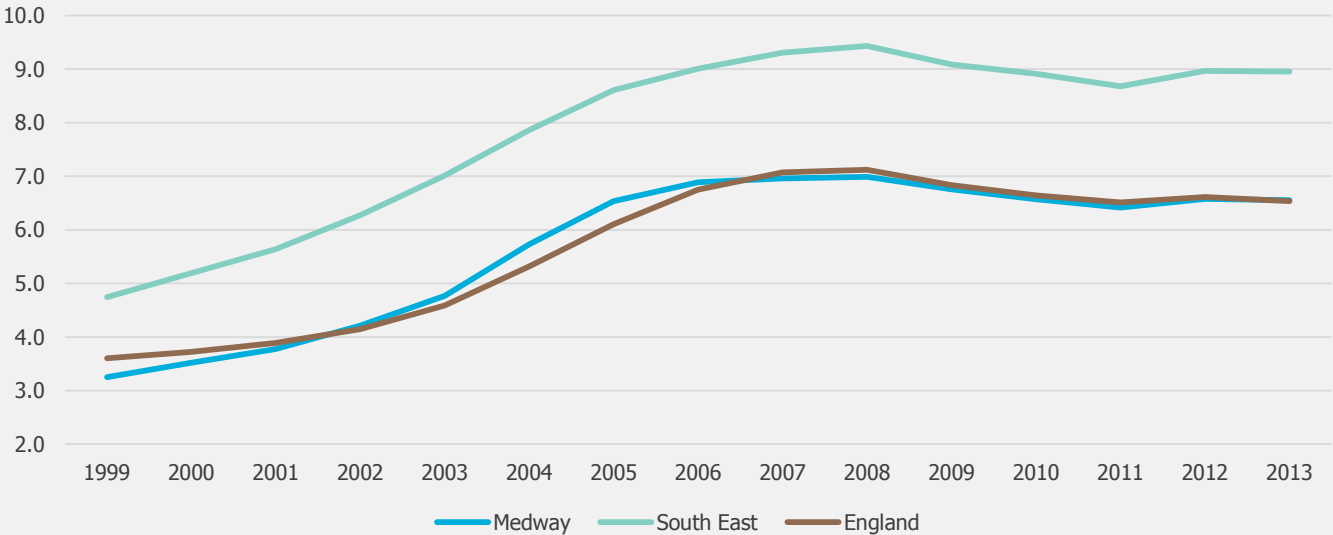
Private housing market entry thresholds indicate that 68% of first time buyers in Medway would not be able to afford a lower quartile house and 59% would not be able to afford lower quartile rents in the Borough.

Affordability is just one of the six market signals that PPG identifies needs consideration when determining housing need, with a worsening trend in any of the indicators providing justification for an adjustment to the housing need number suggested by the household projections.

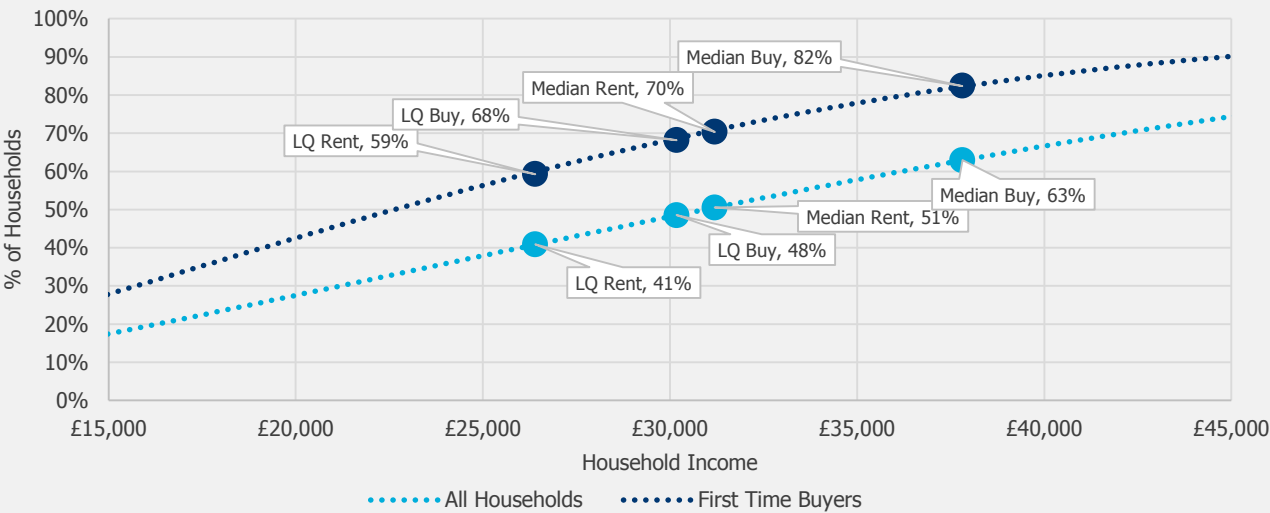
Further consideration of all of the market signals is deemed necessary in order to establish the full extent to which there are market signals issues within Medway, but this evidence suggests an acute affordability problem in Medway.

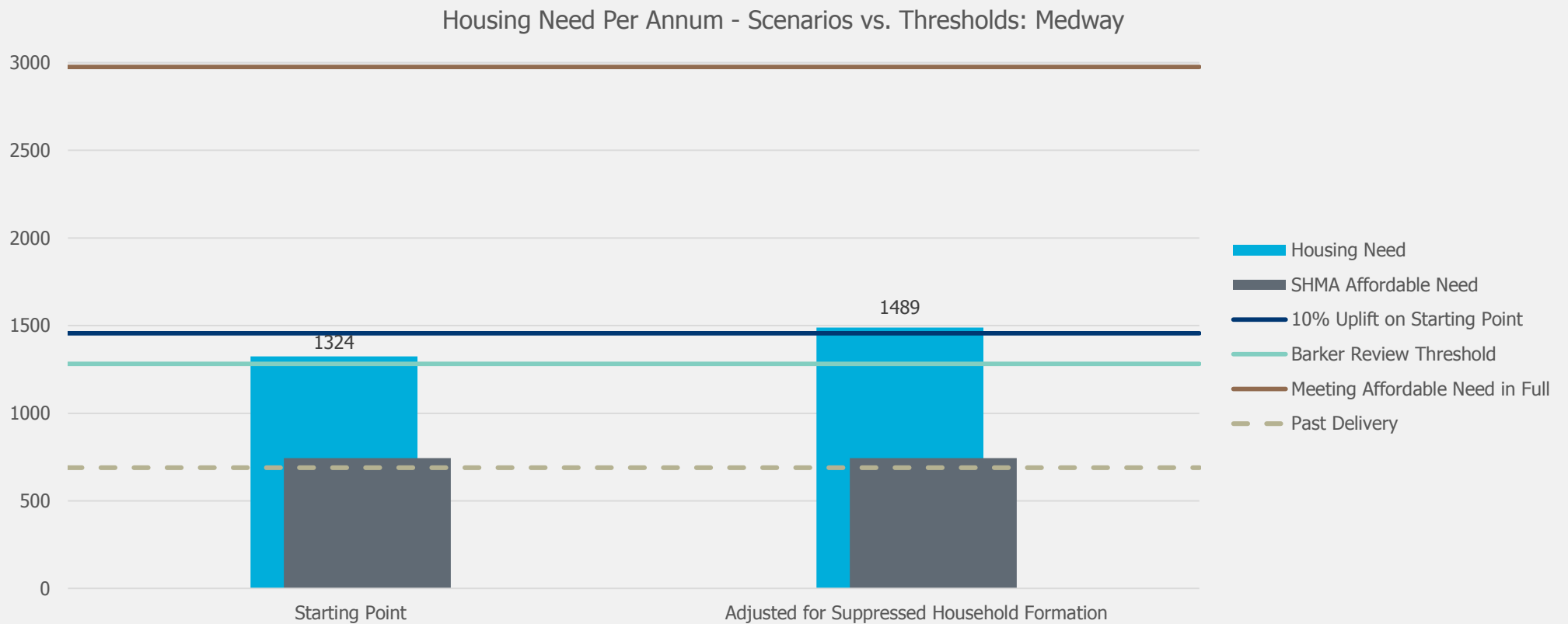
The OAN we propose would help to alleviate worsening affordability in Medway.

Lower Quartile Affordability Ratio: Medway



Private Housing Market Entry Thresholds: Medway





The 'starting point estimate' of housing need in Medway as indicated by the CLG 2012-based household projections is **1,324 dwellings per annum** over the period 2012-2035. If a 10% uplift is applied to the 'starting point' estimate (in line with the 'modest' uplift applied by Inspectors in recent Examinations, for example Eastleigh) to address worsening market signals, then this would bring housing need up to approximately **1,456 dwellings per annum**.

However, the 'starting point estimate' is considered an **underestimate** of future housing need, as it projects suppressed household formation rates in the 25-44 age group over the 23-year Plan period. An adjustment to more positive 2008-based rates of household formation solely in the 25-44 age group shows how the starting point estimate would need to be increased to **1,489 dwellings per annum** to ensure the suppression in the 25-44 age group is alleviated. Planning on the basis of more positive rates of household formation would help to improve affordability for first time buyers and reduce the number of concealed households (such as adult couples living with parents) in this age group.

The 'starting point' adjusted for suppressed household formation would generate the level of economically active population required to meet the average 'policy off' job growth forecast (401 jobs per annum). An upward adjustment for job growth is not considered to be required. However the draft Medway Plan identifies affordable housing need equating to 744 affordable dwellings per annum. The Council's policy is to deliver 25% affordable housing on all major developments. To achieve this, OAN would need to increase to nearly 3,000 dwellings per annum, 2012-2035.

The 2012-based Household Projections indicate a starting point of 1,324 dwellings per annum, including a vacant dwelling adjustment of 3.3%.

The 25-44 age group shows clear signs of suppressed household formation in Medway. A return to pre-recessionary 2008-based household formation rates in this age group by 2035 would increase the starting point estimate to 1,489 dpa, 2012-2035.

Despite net migration to Medway increasing in recent years it is uncertain whether this trend will continue. On this basis, it is considered that the 2012-based SNPP provide an appropriate demographic projection for assessing housing need. However, the level of population growth projected by the 2012-based SNPP should be considered a minimum.

The demographic-led adjustments will result in growth of the economically active (labour force) population that will support the average 'policy-off' job growth forecast (400 jobs per annum). No further adjustment for jobs growth is considered necessary.

The latest evidence from Medway shows affordable housing need of 774 dpa. To meet this in full at provision of 25%, OAN of nearly 3,000 dpa would be required. This is not considered realistic, however we recommend the OAN of 1,489 dpa, which will go some way to meeting some of the significant affordable need.

Full OAN for Medway is considered to be 1,489 dpa, 2012-2035

METHODOLOGY STATEMENT
FOR OBJECTIVELY ASSESSING HOUSING NEED IN
MEDWAY UNITARY AUTHORITY

Project Ref:	20894/A5/DU
Status:	Final
Issue/ Rev:	02
Date:	02/16
Prepared by:	DU
Checked by:	DU
Authorised by:	EW

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Date: February 2016

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1.0 INTRODUCTION

- 1.1 This paper has been produced to accompany the Objectively Assessed Housing Needs (OAN) dashboard for Medway Unitary Authority (MUA). It is intended to provide a more detailed description of the methodology used for assessing OAN.
- 1.2 Chapter 2 of the paper begins with a detailed outline of the national planning policy and guidance on establishing OAN, setting out the methodological approach taken by Barton Willmore.
- 1.3 An overview of the POPGROUP demographic forecasting model is presented in Chapter 3. This is the forecasting tool which has been used by Barton Willmore to undertake sensitivity testing of alternative demographic and household formation assumptions, along with an assessment of the level of housing required to support economic growth.
- 1.4 The data assumptions used within Barton Willmore's assessment of OAN along with their respective sources are presented in Chapter 4.

2.0 OVERVIEW OF OAN METHODOLOGY

- 2.1 The requirement for all Local Planning Authorities (LPAs) to base their housing targets on objective assessments of need is rooted in national planning policy – specifically the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

National Planning Policy Framework (NPPF, 27 March 2012)

- 2.2 NPPF sets out the Government’s planning policies for England and how these are expected to be applied. NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).
- 2.3 In respect of delivering a wide choice of high quality homes, NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).
- 2.4 With regard to plan-making, local planning authorities are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156).
- 2.5 Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of and strategies for housing and employment uses, taking full account of relevant market and economic signals (paragraph 158).
- 2.6 For plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should prepare a Strategic Housing Market Assessment (SHMA) that identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period (paragraph 159).

Planning Practice Guidance (PPG, 06 March 2014)

- 2.7 PPG was issued as a web based resource on 6th March 2014, following the publication of ‘beta’ guidance in 2013. Guidance on the assessment of housing development needs (PPG ID2a) includes the SHMA requirement set out in NPPF and supersedes all previous published SHMA practice guidance (CLG, 2007).

- 2.8 The primary objective of the housing development needs assessment (the SHMA) is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002).
- 2.9 Housing need refers to the scale of housing likely to be needed in the housing market area over the plan period, should cater for the housing demand in the area and identify the scale of housing supply necessary to meet that demand (PPG ID2a 003).
- 2.10 The assessment of need is an objective assessment based on facts and unbiased evidence and constraints should not be applied (PPG ID2a 004).
- 2.11 Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

PPG methodology for assessing housing need

- 2.12 The full methodology is set out at ID 2a 014 to 029 (overall housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

i) Starting point estimate of need

- 2.13 The methodology states that the starting point for assessing overall housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends (ID2a 015).

"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing." (2a-015) (Our emphasis)

ii) Adjusting for demographic evidence

- 2.14 The PPG methodology advises that adjustments to household projection-based estimates of overall housing need should be made on the basis established sources of robust evidence, such as ONS estimates (2a-017).

iii) Adjusting for likely change in job numbers

- 2.15 In addition to taking into account demographic evidence the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems."
(2a-018)

iv) Adjusting for market signals

- 2.16 The final part of the methodology regarding overall housing need is concerned with market signals and their implications for housing supply (2a-019:020).

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." (2a-019)

- 2.17 Assessment of market signals is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards. Particular attention is given to the issue of affordability (2a-020).

"The more significant the affordability constraints ... and the stronger other indicators of high demand ... the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be." (2a-020)

v) Overall housing need

- 2.18 An objective assessment of overall housing need can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.
- 2.19 The extent of any adjustment should be based on the extent to which it passes each test. That is,
- It will at least equal the housing need number implied by the latest demographic evidence,
 - It will at least accommodate projected job demand; and,
 - On reasonable assumptions, it could be expected to improve affordability.
- 2.20 The approach used by Barton Willmore to objectively assess overall housing need follows the methodology set out in PPG 2a-014:20 and summarised above. The result is a policy off assessment of housing need that takes no account of the impact of planned interventions, strategies and policies.

vi) Affordable housing need assessment

- 2.21 The methodology for assessing affordable housing need is set out at 2a-022 to 029 and is largely unchanged from the methodology it supersedes (SHMA 2007). In summary, total affordable need is estimated by subtracting total available stock from total gross need. Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

"The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments ... An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." (2a-029) (our emphasis)

Barton Willmore Methodological Approach

- 2.22 Barton Willmore's approach to OAN closely follows the approach set out in PPG, and is therefore methodologically robust.

Stage One – Define the Housing Market Area Boundary

- 2.23 Before any assessment can be carried out, the limits of the HMA must be defined. This is vital to ensure that the OAN reflects the social and economic dynamics of the area, and informs discussions on distribution should a particular LPA within the HMA face insurmountable challenges in accommodating its own demand for housing.
- 2.24 As a starting point, research from the Centre for Urban and Regional Development Studies (CURDS) at Newcastle University is consulted, and compared against ONS Travel to Work Areas (most recently produced in 2007 from 2001 Census data – update due in 2015) and HMA definitions applied within recent LPA evidence base studies. These definitions are then tested using commuting and migration flow data (plus data on house prices) to determine which is most appropriate for the purpose of assessing housing need, taking account of guidance set out at PPG ID: 2a-009 to 013. The HMA area as defined and used by the LPAs has also been considered within this assessment.

Stage Two – Identify and Adjust Demographic Starting Point

- 2.25 The CLG 2012-based Household Projections (released in February 2015) act as the starting point for assessing housing need (as established at PPG ID: 2a-015). However, these projections alone do not constitute OAN – several adjustments are required based on further evidence.
- 2.26 The first adjustment made is to account for suppressed household formation inherent in the 2012-based household formation rates. The problem of suppression arises because although formation rate projections are based on a long run trend which takes its bearings from Census points since 1961/71, that trend is distorted by the results of the 2011 Census, taken at a time when formation was greatly constrained by economic factors (supply, affordability and the aftermath of recession). An adjustment therefore needs to be made to the household formation rate assumptions, relative to local circumstances. To do this, a return to the household formation rates assumed in the last pre-recession household projections series can be incorporated into the forecasting model, for specific age groups and by gender, as appropriate.

- 2.27 A further adjustment can also be made to test alternative assumptions of net migration. Again, the recession has had a distorting effect on the movement of people between places, so longer term trends can provide a more robust guide of likely migration patterns in the future. However the short-term trend (past 5 years) can be justified.

Stage Three – Assess Labour Force Capacity

- 2.28 To identify the extent to which forecast labour demand will be accommodated by the OAN following the approach described above, a comparison is made between the size of the workforce arising from the adjusted demographic-led modelling, and job creation forecasts, taking into account 'policy-off' average job growth trends forecasts from three sources; Experian Economics, Cambridge Econometrics, and Oxford Economics; and potential changes in unemployment and economic activity rates over the plan period. The ratio of residents in employment and workforce jobs (the commuting ratio) is also an important input into this process.
- 2.29 If the size of the resulting workforce is less than the forecast number of jobs, it is likely that a further uplift in the dwelling target would be required. Should this occur, additional jobs-led modelling is carried out to identify the population growth (and therefore number of dwellings) required to supply sufficient labour capacity.

Stage Four - Assess Market Signals

- 2.30 Housing costs in all parts of the country are less affordable now than 20 years ago, largely due to a significant decline in the number of homes being built. The extent to which this breakdown between the supply of and demand for housing occurs within the subject HMA is observed through an analysis of Market Signals.
- 2.31 Several key Market Signals are assessed including House Prices, Private Rents, Affordability, Concealed and Overcrowded Households and Completion Rates. As stipulated at PPG ID: 2a-020, a worsening trend in any of these indicators requires a boost to the planned level of housing supply.

Stage Five – Bringing the Evidence Together

- 2.32 Overall housing need is identified by distilling the analyses discussed above into a single OAN for the period 2012-2035. This figure, by definition, does not take into account policy considerations which may place constraints on supply or limit the deliverability of housing. Housing need figures are provided for the relevant individual LPAs, but distribution of the

overall HMA OAN will in practice be subject to agreements between LPAs being made, including any constraints in particular areas.

Stage Six – Affordable Housing Need

- 2.33 The extent to which the OAN arrived at through the previous stages would meet affordable need is also assessed. Where the local authority SHMA has provided a recent and detailed account of affordable need which draws on primary research, this is used as the basis for much of the analysis. Where an LPA has not undertaken an affordable housing need assessment, an indication of what the requirement would be to meet the LPAs affordable policy is provided.

Chapter Summary

- 2.34 The approach of national policy and guidance clearly states the importance of objectivity and transparency in the assessment of housing requirements. This study has been prepared in accordance with this approach, and uses data and methodologies (where possible) which can be traced and replicated. The ultimate output of this study is a clear, unambiguous recommendation for housing development which is supported by a robust evidence base and sound assumptions.

3.0 POPGROUP AND DEMOGRAPHIC FORECASTING MODEL

3.1 The POPGROUP and Derived Forecast (DF) model is a well-established demographic model developed to forecast population, households and the labour force for specified geographical areas. POPGROUP has over 90 users, including academic and public service staff in housing, planning, health, policy, research, economic development and social services. It is the industry standard in the UK for demographic analysis within strategic planning. More information about POPGROUP can be found at <http://www.ccsr.ac.uk/popgroup/index.html>

3.2 The main POPGROUP model uses standard demographic methods of cohort component modelling that enables the development of population forecasts based on births, deaths and migration inputs and assumptions. In summary, this methodology adopts the following approach:

- take a base population by single year of age and gender;
- add births and 'in' migration (by age and gender) for year 1;
- subtract deaths and 'out' migration (by age and gender) for year 1;
- age the entire population by one year;
- results for year 1 can be noted;
- repeat the process above for each subsequent year of the forecast

3.3 The POPGROUP model can be used in conjunction with the DF model to produce household and labour force projections and subsequently to use housing and jobs as additional assumptions and constraints in further population projections.

3.4 Importantly the POPGROUP Model provides:

- independent projections that do not rely on other commercial forecasts;
- the ability to replicate Central Government population and household projections;
- the ability to run alternative 'what if' scenarios;
- flexibility to change data assumptions;
- a systematic, rigorous and transparent method so that results are easily traced back to assumptions;
- considerable disaggregation (e.g. annual forecasts, by single year of age and household types by age of 'head of household' for example)

- 3.5 In order to assess OAN, firstly the Central Government 2012-based population and household projections are re-produced within the POPGROUP model. This enables the starting point estimate of need to be determined according to PPG.
- 3.6 The POPGROUP model is then used to undertake a series of sensitivity tests by changing a number of input assumptions. The model assumptions that can be changed by the user are:
- starting population (by age and gender);
 - fertility rates (by age);
 - mortality rates (by age and gender);
 - household assumptions (vacancy rates, proportion second homes);
 - household representative rates (proportion of population, by age, gender and marital status, that are head of household);
 - in-migration profile (by age and gender and whether a migrant originates from elsewhere within the UK or from overseas);
 - out-migration profile (by age and gender and whether a migrant emigrates to elsewhere within the UK or overseas);
 - phasing of dwellings.
- 3.7 The first sensitivity test that is undertaken is to test the impact of alternative household formation rates in comparison to the rates used by CLG to produce the most recent 2012-based household projections. Household formation rates indicate the likelihood of a person to form a notional head of household. Household formation rates (by age and gender) are applied to the generated population forecast in order to indicate the future number of households and by analysing change over time can be used to indicate a future housing need requirement once an adjustment has been applied to take account of vacancy and second homes. This sensitivity test models the impact of applying a gradual full return to the 2008-based household formation rates for 25-34 year olds by 2035.
- 3.8 The second sensitivity test modelled within POPGROUP is to apply alternative migration trends in comparison to those used to produce the 2012-based Sub National Population Projections (SNPP). The 2012-based SNPP draw trends from the five-year period 2007-2012; a period reflecting deep economic recession which in some places resulted in atypical migration patterns.
- 3.9 The 2012-based ONS SNPP for Medway assumes net in-migration to Medway of 840 people per annum, 2012-2035. This is based on trends drawn from the period 2007-2012. Analysis of net migration over this period indicates net migration of 941 people per annum over this period

which is lower than average net migration of 1,159 people per annum drawn from a more recent 5-year period (2009-2014). Despite net migration to Medway increasing in recent years, it is uncertain whether this trend will continue. For this reason Barton Willmore consider the 2012-based SNPP to provide a reasonable demographic projection for Medway at this point in time. However, our approach may be adjusted in light of new evidence (for example, if the release of subsequent Mid-Year Population Estimates illustrates net migration to Medway continuing to increase).

- 3.10 In light of this, no alternative migration trends are presented for Medway. However, if they were, our approach to modelling alternative migration trends is outlined below.
- 3.9 There are two different ways to approach the consideration of alternative migration trends:
- The counts approach is based on the average net migrant count per year, by age and gender, for each migration flow (in and out) over a given period;
 - The rates approach is based on the average migrant count per year divided by the reference population, by age and gender for each migration flow over a given period. The reference population is taken to be UK population minus district population for in flows and district population for out flows.
- 3.10 Each approach will lead to slightly different results. For example, a 5-year trend of counts will result in a different population projection to one based on a 5-year trend of rates, yet both are reflective of a short-term (5-year) trend. No approach is right or wrong. However, a counts approach uses a fixed number of total migrants in each year of the projection period. In reality, this is unlikely to happen and migration counts will fluctuate. A rates based approach applies the past trend of age and gender specific migration rates to the changing demographic profile and as a result the number of migrants in each year of the projection period will be different.
- 3.11 Our preference is to use the rates based approach as in addition to reflecting past trends, it responds to the changing demographic profile, providing in our opinion, a more robust assessment. Furthermore this is the approach used by ONS to produce the Sub National Population Projections.
- 3.12 Model outputs from the sensitivity tests provide an indication of the resident labour supply that would be generated from the given scenario and by applying assumptions regarding unemployment and economic activity this can be used to determine the number of jobs that could be supported. This enables a conclusion to be reached as to whether the demographic-led assessment of need would support job growth in line with past trends and economic

forecasts. If it is determined that the demographic-led assessment of need would not support economic growth in line with past trends and economic forecasts, the POPGROUP model is then used to determine what level of housing would be required to support such economic growth.

- 3.13 The POPGROUP model is used to produce a population forecast constrained to an annual job growth target as indicated by past trends and/ or economic forecasts. In a job-led forecast the POPGROUP model calculates the required population and dwelling growth needed to support the future job target. In this type of forecast the model forecasts the population through the cohort component methodology but increases (or decreases) the population accordingly to meet the set job target by altering migration levels.
- 3.14 The POPGROUP model contains data specifically relating to the local authority under consideration in order to reflect the socio-demographic profile of the study area. The data assumptions and sources used to produce the Medway Unitary Authority forecasts are presented in the next section.

4.0 DATA SOURCES AND ASSUMPTIONS

- 4.1 The data assumptions and sources that have been used in the POPGROUP model to produce the OAN for Medway Borough are presented in Table 4.1.

Table 4.1: POPGROUP modelling assumptions

Variable	Data set	Source
Base population	2012 Mid-Year Population Estimates by single year of age and gender are used as the base population.	Office for National Statistics (ONS)
Fertility rate	Age specific fertility rates	ONS 2012-based Sub National Population Projections
Mortality rate	Age standardised mortality ratios by gender	ONS 2012-based Sub National Population Projections
Migrant profile	Age and gender specific migration rates broken down by in-migrants from overseas, in migrants from elsewhere within the UK, out-migrants to overseas, out-migrants to elsewhere in the UK	ONS 2012-based Sub National Population Projections.
Communal establishment population	Age and gender counts of people living in communal establishments. For ages 75+ proportions rather than counts are used to reflect the ageing population.	CLG 2012-based household projections
Household representative rates	Household representative rates by age and gender	CLG 2012-based household projections (Stage One) with sensitivity testing a full return to 2008-based rates by 2035 for those aged 25-44 years
Vacancy/ Sharing/ Second home rate	Proportion of dwellings vacant and second homes (3.3% in Medway).	2014 Council Tax Base and Live Table 125/615 (CLG)

Commuting ratio	Ratio based on residents in employment divided by workplace jobs (1.28 in Medway).	2011 Census Travel to Work Statistics (Table WJ01UK), ONS
Unemployment rate	APS model-based 2011 estimates falling to average rate between 2004 and 2007 by 2021 and then held constant (9.6% in 2011 falling to 5.5% in 2021).	Annual Population Survey (APS), ONS
Economic activity rates	Economic activity rates by age and gender are applied to the resident population to calculate resident labour force	2011 Census (ONS) and projected following Kent County Council (KCC) November 2014 methodology to take account of changes in retirement age (brief summary outlined below)

Projecting economic activity rates

- 4.2 Projecting economic activity rates has followed the Kent County Council methodology. This is a reasonable approach as it is the only contemporary research that we know of that seeks to predict what might happen to activity rates in the future, taking account of changes to the state pension age and trends in participation including working into old age. Economic activity rates have been calculated using 2011 Census data. Rates for 16 and 17 year olds have been calculated separately to model the impact of the extension of state education to 18 years of age by 2015. The expected impact of which is to slightly reduce economic activity of 16 and 17 year olds post 2015 (although account is taken of the fact that some will still have part-time jobs).
- 4.3 Economic activity rates for the remainder of the population are calculated by 5-year age group. Rates are projected to 2020 following the rate of change projected in the last set of national activity rate projections (2006). Post 2020 rates are held constant for all age groups falling between ages 18 to 49 years. For all age groups over 50 years, activity rates are increased to take account of the extension to State Pension Age and the effective abolition of age-related retirement.

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Reference

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Organisation

Barton Willmore

On Behalf Of

Abbey Developments

Type of Consultee

Developer/Consultant

MEDWAY COUNCIL LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2012 – 2035

RESPONSE TO PUBLIC CONSULTATION

ON BEHALF OF
ABBEEY DEVELOPMENTS LTD

February 2016

**MEDWAY COUNCIL LOCAL PLAN
ISSUES AND OPTIONS CONSULTATION 2012 – 2035**

RESPONSE TO PUBLIC CONSULTATION

**ON BEHALF OF
ABBNEY DEVELOPMENTS LTD**

Project Ref:	25971/A5
Status:	FINAL
Issue/Rev:	03
Date:	29 February 2016
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APPENDICES

Appendix A: Site Location Plan (Dwg No. 8117.10.01)

1.0 INTRODUCTION

i) Purpose of these Representations

- 1.1 These representations have been prepared on behalf of Abbey Developments Ltd and sets out comments in response to Medway Council's (MC) Local Plan Issues and Options Consultation (LPIO, January/February 2016). Abbey Developments Ltd has land interest in a Site known as 'Land at Meresborough Road, Rainham' (hereafter referred to as 'the Site'). A Site Location Plan is included at **Appendix A**.
- 1.2 The Site was put forward for consideration to MC's 'Call for Sites' Strategic Land Availability Assessment (SLAA) in 2009 (SLAA 2010 Ref: 0692). Part of the Site was also submitted to MC's subsequent 'Call for Sites' SLAA in May 2014 (SLAA 2015 Ref: 0322).
- 1.3 Further detail on the Site is contained in Section 10.0 of these representations.
- 1.4 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework (NPPF) (March 2012), National Planning Practice Guidance (PPG) (March 2014) and the Consultation on Proposed Changes to National Planning Policy (December 2015).

ii) Purpose of the LPIO

- 1.5 The LPIO document advises that the current consultation is in advance of the preparation of a new Local Plan, and therefore is not a formal Regulation stage under the Town and Country Planning (Local Planning) Regulations 2012 ('the Local Planning Regulations'). The Local Development Scheme 2015-2018 (November 2015) anticipates that a "Preferred Options" consultation will be undertaken in January to February 2017, forming the first formal stage in the Local Plan's preparation (under Regulation 18 of the Local Planning Regulations).
- 1.6 The LPIO (January/February 2016) sets out the key contextual matters for the Local Plan, for which the increasing population in Medway is considered to be most central. In total there are 22no. matters in the LPIO document, and a number of questions posed.
- 1.7 In addition, the LPIO considers a number of potential approaches that could be taken to form a development strategy for a new Local Plan, based on identified development principles (LPIO, para 27.8). The potential approaches include:

- High density town centre and riverside development;
- Incremental suburban development;
- Planning growth of existing settlements;
- Freestanding settlements;
- Urban extensions;
- Role of custom and self-build housing; and
- Chatham Town Centre.

1.8 Whilst the consultation is welcomed, it should be recognised that the LPIO does not contain any detailed policies or identify specific development sites (excluding reference to the unknown outcome of Lodge Hill) that can be assessed, and therefore due to the “broad” nature of the questions posed, the benefit of the consultation responses to MC will be limited in this regard.

1.9 The LPIO consultation has not been accompanied by a suite of Evidence Base documents that should inform the production of a new Local Plan. Indeed, the Strategic Housing and Economic Needs Assessment (SHENA), the only Evidence Base document due for publication alongside the LPIO consultation (in January 2016), was not made publicly available until 19 February 2016, i.e. 6 weeks from the start of the consultation period and 1 week from its close.

iii) Content of Representations

1.10 The LPIO (January/February 2016) and the strategy for the preparation of a new Local Plan, has been assessed on the basis of National policies as set out in Section 2.0. These representations are structured as follows and provide a response to the following matters/questions:

- Section 2.0 – National Policy
- Section 3.0 – Housing/Questions 4, 5 & 6
- Section 4.0 – Environment/Questions 30 & 32
- Section 5.0 – Open Space/Question 52
- Section 6.0 – Agricultural Land/Question 56
- Section 7.0 – Transport/Question 72
- Section 8.0 – Deliverability/Question 77
- Section 9.0 – Development Strategy/Questions 81 & 82

1.11 In summary, these representations set out the following comments:

- The North Kent SHENA identifies the Objectively Assessed Needs (OAN) for Medway as being 1,281 dwellings per annum over the period 2012-2037 which does not represent the full OAN for Medway over the Plan period (2012-2035);
- Development of the 'Land at Meresborough Road, Rainham' would constitute a sustainable form of development. The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151);
- The future growth strategy for the Medway area should make a provision for development at the Site in the new Local Plan.

2.0 NATIONAL POLICY

i) National Policy and Plan Making

- 2.1 The NPPF was published in March 2012. In general terms, the NPPF advocates a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development.
- 2.2 The NPPF (para 182) requires that, *"A local planning authority should submit a plan for examination which it considers is "sound" – namely that is"*:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 2.3 Paragraph 156 of the NPPF states that LPAs should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- The homes and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - The provision of health, security, community and cultural infrastructure and other local facilities; and
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.4 Paragraph 157 advocates that crucially Local Plans should:

- Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- Be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- Be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- Identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- Identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- Contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals (para 158).

2.6 The NPPF directs LPAs to prepare an evidence base which indicates that objectively assessed needs for market and affordable housing are met. LPAs should plan for a housing mix which takes into account “housing demand and the scale of housing supply necessary to meet this demand.” Household and population projections should also be a key consideration, taking into account of migration and demographic change (para 159).

ii) National Policy and Housing Need

2.7 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, ‘Objectively Assessed Needs’ (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework,

including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.

- 2.8 LPAs must plan for a mix of housing that *"meets housing and population projections, taking account of migration and demographic change"* (para 159). Significant weight should also be placed on the need to support economic growth through the planning system (para 19).
- 2.9 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

(Reference ID: 2a-015-20140306)

- 2.10 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

iii) **Duty to Co-Operate**

- 2.11 The 'Duty to Co-operate' as provided for in Section 110 of the Localism Act 2011, came into effect on 15 November 2011. The Duty was introduced under the 2011 Act to address the impact of the loss of the "top-down" effect from the Regional Spatial Strategy (The South East Plan) and to offer a transparent way in which authorities should relate to one another on cross boundary issues. The Duty is now shared between authorities requiring them to collaborate on cross-boundary matters and issues of sub-regional and regional importance, especially housing provision and related infrastructure issues.

- 2.12 Section 33A(2)(a) requires that local authorities “engage constructively, actively and on an ongoing basis” in the plan-making process. The NPPF refers to the ‘Duty to Co-operate’ in paragraphs 157 and 178-181. Crucially, paragraph 157 of the NPPF states that *“Local plans should be based on cooperation with neighbouring authorities...”*.
- 2.13 Paragraphs 178-181 are clear in directing LPAs as to the importance of the ‘Duty to Co-operate’ and the proactive approach necessary to ensure a collaborative approach to reflect individual Local Plans. Paragraph 179 states *“joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework”*.
- 2.14 Paragraph 182, as above, provides that an Inspector should assess *“whether the plan has been prepared in accordance with the Duty to Cooperate”* such that compliance with the Duty must also be reflected in the assessment of soundness.
- 2.15 In addition, in March 2014 the CLG published the PPG, to “reflect and support” the NPPF. The PPG contains considerable guidance on the Duty to Co-operate. This is largely due to the fact that the Duty to Co-operate has proved to be a contentious part of the NPPF, with numerous Local Plans being scrutinised at examination due to failure to fulfil the Duty.
- 2.16 The guidance emphasises the importance for LPAs to work together; stressing that *“Cooperation between local planning authorities, county councils and other public bodies should produce effective policies on strategic cross boundary matters. Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local planning authorities have approached others”* (Reference ID: 9-010-20140306).
- 2.17 The PPG also states that LPAs must *“engage constructively, actively and on an ongoing basis to maximise the effectiveness of the plan-making process”* (Reference ID: 9-001-20140306). The ultimate outcome of the engagement should be the production of effective policies on cross boundary strategic matters.

2.18 In summary, there are two aspects to the 'Duty to Co-Operate':

- 'Duty to Co-Operate' – the s33A legal test is a 'process' preparation test. The Duty is incapable of modification at an Examination. Therefore, this is one of the first things that has to be examined because, if the legal requirement is not met, then the Inspector must recommend non adoption of the Plan;
- Collaborative Joint Working – an aspect of soundness. It is primarily concerned with the 'positively prepared' and 'effectiveness' soundness test set out in paragraph 182 of the NPPF. This relates to outcome rather than process.

2.19 The 'Duty to Co-Operate' between LPAs is a clear requirement of national planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in paragraph 156 (para 178).

2.20 In addition, paragraph 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged (para 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate during the plan-making process (para 181).

3.0 HOUSING

Question 4 – Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

- 3.1 We do not consider that the approach and conclusions in assessing the housing need for Medway over the Plan period have been appropriately assessed. We do not consider that the housing need, as calculated by MC, is “sound” and in line with National policy.
- 3.2 The NPPF directs LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and identify the scale, mix and range of tenures that the local population is likely to meet over the Plan period. In addition, LPAs should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land (NPPF, para 159).

i) Medway’s OAN Work

- 3.3 MC has jointly produced a North Kent SHENA with Gravesham Borough Council, comprising a Baseline Report (March 2015) and SHMA (November 2015).
- 3.4 The North Kent SHENA identifies OAN for Medway as being 1,281 dwellings per annum (dpa) over the period 2012-2037 (equating to 32,025 dwellings in total) based on the result of the CLG 2012-based household projection adjusted take account of 2013 and 2014 Mid-Year Population Estimates. This level of housing per annum (i.e. 1,281 dpa) has been taken forward in the LPIO (January/February 2016) to represent over the period 2012-2035.
- 3.5 The LPIO (January/February 2016) (para 1.3) directs that the OAN for Medway is 29,463 dwellings over the period 2012-2035, based on the annual figure of 1,281 dwellings. This figure is below the level of need identified by the CLG 2012-based household projections which identifies 29,447 households equivalent to 30,410 dwellings over the same period. The PPG states that the CLG figure should be used as the ‘starting point’ estimate of need (Reference ID: 2a-015-20140306). The ‘starting point’ usually requires adjustment to address suppressed household formation and suppressed migration trends.
- 3.6 Overall, it is considered that the LPIO (January/February 2016) does not seek to meet the correct OAN for Medway. It is considered that the full OAN for Medway could be in the region of 1,489 dpa. This matter should be addressed in the next iteration of the Local Plan as the current position is considered to be “unsound”.

ii) Under Delivery of Housing

- 3.7 The Consultation on Proposed Change to National Planning Policy (CPCNPP) (December 2015) indicates that CLG are intending to amend National planning policy to ensure appropriate action is taken where there is a significant shortfall between the homes provided for in Local Plans and the houses being constructed. A housing delivery test is proposed (as outlined in the Spending Review and Autumn Statement 2015 (HM Treasury, November 2015)). It is envisaged that this approach would compare the number of homes that LPAs set out to deliver in its Local Plan against the net additions in housing supply within the LPA area (CPCNPP, para 30). Consequently, LPAs shall have to ensure that OAN figures are suitably robust and achievable in line with current National planning policy and the emphasis that is being placed on delivery rates.
- 3.8 This matter is particularly pertinent for MC following a recent Appeal Decision (APP/A2280/W/15/3002877) in which the Planning Inspector concluded that the substantial shortfall in previous years in housing delivery when set against the housing requirements, represented persistent under delivery (NPPF, para 47).
- 3.9 The CPCNPP considers that continued significant under-delivery of housing identified over a sustained period, as is the case for MC, should be addressed by appropriate action. The CPCNPP considers that one approach to addressing under delivery rates could be to identify additional sustainable sites if it has been shown that the existing approach is not delivering the housing required. Such sites would need to be in sustainable locations, with appropriate infrastructure and which can be demonstrated as deliverable. To deliver such an approach, it is recognised that collaboration between developers and local communities, undertaking appropriate consultation would be required to undertake policy reviews, enabling additional land in sustainable locations to come forward (CPCNPP, paras 31-33).

Question 5 – What do you consider to be the appropriate housing market area for Medway?

- 3.10 The SHMA (November 2015) defines the Housing Market Area to comprise Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling.
- 3.11 MC should seek to work collaboratively under the 'Duty to Co-operate' to address the housing needs of neighbouring authorities and how housing can be delivered in the HMA that is influenced by other HMAs.

Question 6 – Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

- 3.12 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012-2037), the Local Plan period (2012-2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744 dpa), which would constitute 58% of MC's identified OAN figure of 1,281 dpa. The PPG advises that an increase in the total Local Plan housing figure should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).
- 3.13 The need for affordable housing should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be given to ensure sustainable development and the deliverability of the Plan (para 173).
- 3.14 We would consider that based on the North Kent SHMA (November 2015), seeking the provision of 25% affordable housing is appropriate. An increase of the housing requirement to meet the full OAN figure would both be in line with National policy (NPPF, para 47) and therefore "sound", and contribute to achieving a greater number of affordable dwellings.

4.0 ENVIRONMENT

Question 30 – What are the most effective means to secure and strengthen Medway’s environment, in the context of the area’s development needs?

- 4.1 We would consider that one of the ways in which MC could strike a balance between securing and strengthening Medway’s environment and addressing the area’s development needs would be to allocate land that is capable of avoiding significant harm on biodiversity, or land that is capable of providing mitigation in accordance with the NPPF (para 118) such as incorporating open space that would be readily accessible on foot to proposed residents, thereby reducing development pressure on designated sites such as SPA or Ramsar.

Question 32 – What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

- 4.2 Paragraph 113 of the NPPF directs that distinction should be made between the hierarchy of international, national and locally designated sites, so that protection is proportionate with such status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.
- 4.3 The NPPF (para 113) directs that LPAs should set ‘criteria based’ policies against which proposals in protected landscape areas will be judged. It should be noted that in a recent Appeal Decision (APP/A2280/W/15/3002877), the Inspector noted that Medway Landscape Character Assessment (MLCA) (2011), in seeking to recognise and protect areas of recognised local landscape character, was not inherently inconsistent with the NPPF, however “the ALLI designations were not based upon a landscape character assessment” (paragraph 23) and therefore did not fully accord with the NPPF in this respect.
- 4.4 To be ‘Consistent with National policy’, the new Local Plan for Medway should set ‘criteria based’ policies against which proposals in protected landscape areas can be judged. In order for the new Local Plan to be ‘Justified’ in this respect, we recommend that a Medway-wide landscape review is undertaken to inform both the spatial strategy for the area and landscape based policies.

5.0 OPEN SPACE

Question 52 – Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

- 5.1 We consider that open space provision for new development should take a balance between the two approaches. The provision of on-site open space should be considered within the context of each development site, assessing the potential feasibility of a development site to provide for on-site open space provision or whether contributions towards maintaining and enhancing the existing estate is deemed more appropriate.

6.0 AGRICULTURAL LAND

Question 56 – What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

- 6.1 The NPPF (para 112) directs that LPAs should take into account the benefits of the best and most versatile (BMV) agricultural land. Where significant development is necessary on agricultural land, LPAs should seek to use areas of poorer quality land in preference to that of higher quality.
- 6.2 The NPPF does not preclude development on BMV land and a significant proportion of land in close proximity to urban areas is BMV. Therefore M C s hould seek to secure the area's development needs and achieve the economic, social and environmental dimensions of sustainable development without precluding development on BMV land. This includes the Site, which is sustainably located and comprises predominantly Grade 1 agricultural land.
- 6.3 Further to the above, the Site is approximately 0.8 hectares in size and is not therefore considered to amount to 'significant' development in the context of the NPPF (para 112).

7.0 TRANSPORT

Question 72 – What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

- 7.1 The NPPF (para 29) highlights the importance for the transport system to be balanced in favour of sustainable transport modes and providing users with a choice on how they travel, whilst acknowledging that different measures will be required and opportunities will vary from urban to rural areas.
- 7.2 The new Local Plan for Medway should contain both transport policies and development allocations that support the achievement of sustainable development by focussing new development within or in close proximity to existing built up areas where existing infrastructure is in place.
- 7.3 The Site is well served by a variety of modes of transport, including pedestrian and public transport, in addition to the private motor car. Bus Route 120, 121 and 132 passes near to the Site and travel into Rainham and Chatham town centres. National Cycle Network Route 1 passes near to the Site along Otterham Quay Lane. Public Right of Way (PRoW) GB12 is located immediately to the south of the Site and connects the Site into the wider PRoW network.
- 7.4 East Rainham was one of a limited number of areas that were assessed as a realistic option for strategic housing growth as part of the previous Core Strategy (Medway Core Strategy Major Sites Assessment, October 2013). Whilst it is considered that the Site is in a sustainable location and should be allocated for development in the absence of such growth, it is noted that strategic growth would also bring the added benefits of additional services and infrastructure upgrades to this area.

8.0 DELIVERABILITY

Question 77 – Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

- 8.1 We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account different viability between areas of Medway.
- 8.2 The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened"* (NPPF, para 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing, when taking account of the normal cost of development and mitigation, should provide competitive returns to a landowner/developer to enable the development to be deliverable.

9.0 DEVELOPMENT STRATEGY

Question 81 – Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

- 9.1 The type of development entitled 'Incremental Suburban Development' states that incremental growth can make it "*more difficult to plan for improvements to road and community facilities*" (para 27.18). We consider that this type of development can provide a credible contribution to the area's development needs alongside other development type options. Funding contributions can be secured in accordance with the Community Infrastructure Levy Regulations 2010 where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.
- 9.2 A variety of development types are needed to meet the area's development needs and can assist in creating sustainable, inclusive and mixed communities as required in National policy (para 50).

Question 82 – Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

- 9.3 We consider that a range of development types, as outlined within LPIO (January/February 2016) should be utilised in meeting Medway's growth requirements. This should be based on an overarching vision of sustainable development, as underpinned by National and local planning policy. When selecting development types, it is important to consider the aspirations and requirements of National policy.
- 9.4 The NPPF encourages LPAs in plan-making to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. LPAs should plan for a mixed of housing based on current and future demographic trends, market trends and the needs of different groups in the community that is required in particular locations (NPPF, para 50).
- 9.5 Development at the Site would provide an opportunity to deliver a small to medium sized residential development to assist in meeting Medway's housing needs.

10.0 LAND AT MERESBOROUGH ROAD, RAINHAM

- 10.1 The Site is located to the east of Rainham, to the south of Moor Park Close and west of Meresborough Road. It is currently private open scrub land and woodland including a landscaped bund, in the sole ownership of Abbey Developments Ltd. The Site is located immediately adjacent to the existing Abbey development at Moor Park Close and is approximately 0.8 hectares in total.
- 10.2 The Site is situated within the Area of Local Landscape Importance (ALLI) of the Moor Street Farmland (under Policy BNE34 of the Medway Local Plan 2003).

i) Previous SLAA Assessments

- 10.3 As part of the SLAA (November 2010), the whole Site (SLAA Ref: 0692) was assessed and rejected on the grounds of "policy grounds/greenfield/coalescence", however no further explanation is provided. The "rejected" Site was contained in the subsequent SLAA Reviews (2011, 2012, 2013 and 2014), albeit was not reassessed as part of those reviews.
- 10.4 Part of the Site, namely the periphery immediately adjacent to the existing built up area of Rainham was submitted and assessed as part of the SLAA (2015) (Ref: 0322). In summary, the Site was assessed as follows:
- Moderate access to services and facilities;
 - Good access to public transport opportunities;
 - Anticipated that the highway network around the site could accommodate the traffic generated by the development, although some financial contributions to enhancements may be required;
 - A suitable vehicular access could be created onto Moor Park Close;
 - Development is unlikely to have an impact upon the any designated heritage assets;
 - Site is not designated as open space, and would not result in the loss of any agricultural land;
 - Site is constrained by noise pollution, and is at low risk of flooding.
- 10.5 The only constraint to development identified in the SLAA, which led to the conclusion that it is unsuitable for development, was due to the Site inclusion in the ALLI of Moor Street Farmland, which is considered sensitive to change, and therefore development of the Site is deemed "likely" to have a detrimental impact on such a designation.

- 10.6 As per Section 4.0 of these representations, in a recent Appeal Decision (APP/A2280/W/15/3002877), the Inspector noted that “the ALLI designations were not based upon a landscape character assessment” (paragraph 23) and therefore did not fully accord with the NPPF in this respect. We recommend that a Medway-wide landscape review is undertaken to inform the new Local Plan.
- 10.7 It is noted that a Full planning application is currently pending for 136 residential dwellings on ‘land to the east of Mierscourt Road, Rainham’ (SLAA 2015 Ref: 1058) and is located approximately 0.15km south-west of the Site.

ii) Sustainable Development

- 10.8 The NPPF and PPG puts sustainable development at the heart of the planning system (NPPF, para 7) for both plan-making and decision-taking, and describes it as covering three main aspects including economic, social and environmental.
- 10.9 Development of the Site would constitute a sustainable form of development. The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151).
- 10.10 The Site is assessed to be sustainable development located adjacent to existing built residential development. The Site is accessible, located adjacent to an existing local road network and in close proximity to the railway, with Rainham Railway Station approximately 0.9km to the north-west of the Site. The Site’s development would form a relatively minor expansion to the existing built development located to the northern boundary of the Site.
- 10.11 The development would meet the three elements of sustainable development, as set out in the NPPF. Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has the potential to contribute towards the delivery of much needed housing within Medway and deliver a mix of housing types in accordance with the NPPF (para 47). The Site is currently available for development, would offer a suitable location for development and has a realistic prospect of housing being delivered on the Site within five years to meet short term development needs.

11.0 CONCLUSIONS

- 11.1 Whilst we support Medway's Council intention to undertake a form of public consultation on a new Local Plan for the area, the LPIO (January/February 2016) is limited in content and is "broad" in the nature of questions it poses.
- 11.2 Based on the information available, we consider that there is further work to be done in order to ensure MC is working towards a "sound" Local Plan. Notably, the current identified housing figure needs to be revisited to identify full OAN, as required by National policy.
- 11.3 It is also vital that the evidence base, which should inform and underpin the Local Plan, is made available prior to any next stage of formal consultation on the Local Plan. Without these, MC will be unable to make an informed decision on future growth strategies for the area, nor will the public be able to make informed comments which in turn would assist MC.
- 11.4 Development of the Site would constitute a sustainable form of development. The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151). Therefore, the future growth strategy for the Medway area should therefore make a provision for development at the Site in the new Local Plan.

APPENDIX A
SITE LOCATION PLAN



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NOTES:

Client:

**ABBEY
DEVELOPMENTS
LTD**

Job title:

**LAND AT
MERESBOROUGH
ROAD, RAINHAM**

Drawing title:

**SITE LOCATION
PLAN**

Plan No: 8117-10.01

Scale:
1:1250

Date:
27.01.09

Drawn:
AHT



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Organisation

Barton Willmore

On Behalf Of

Pickhill Developments Ltd

Type of Consultee

Developer/Consultant

MEDWAY COUNCIL LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2012 – 2035

RESPONSE TO PUBLIC CONSULTATION
ON BEHALF OF
PICKHILL DEVELOPMENTS LTD

February 2016

**MEDWAY COUNCIL LOCAL PLAN
ISSUES AND OPTIONS CONSULTATION 2012 – 2035**

RESPONSE TO PUBLIC CONSULTATION

**ON BEHALF OF
PICKHILL DEVELOPMENTS LTD**

Project Ref:	23648/A5
Status:	Final
Issue/Rev:	02
Date:	29 February 2016
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29 February 2016

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APPENDICES

Appendix A: Site Location Plan

**Appendix B: Pickhill Developments Ltd Presentation to Medway Council
(11 December 2014)**

1.0 INTRODUCTION

i) Purpose of these Representations

- 1.1 These representations have been prepared on behalf of Pickhill Developments Ltd and sets out comments in response to Medway Council's (MC) Local Plan Issues and Options Consultation (LPIO, January/February 2016). Pickhill Developments Ltd has land interest in a Site known as 'Land South of Lower Rainham Road, Rainham' (hereafter referred to as 'the Site'). A Site Location Plan is included at **Appendix A**.
- 1.2 The Site was put forward for consideration to MC's 'Call for Sites' Strategic Land Availability Assessment (SLAA) in 2014 (SLAA Ref: 1064). MC Planning Officers requested a meeting regarding the Site, which was subsequently held on 11 December 2014. A copy of the presentation to MC is included at **Appendix B**.
- 1.3 Further detail on the Site is contained in Section 11.0 of these representations.
- 1.4 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework (NPPF) (March 2012), National Planning Practice Guidance (PPG) (March 2014) and the Consultation on Proposed Changes to National Planning Policy (December 2015).

ii) Purpose of the LPIO

- 1.5 The LPIO document advises that the current consultation is in advance of the preparation of a new Local Plan, and therefore is not a formal Regulation stage under the Town and Country Planning (Local Planning) Regulations 2012 ('the Local Planning Regulations'). The Local Development Scheme 2015 – 2018 (November 2015) anticipates that a "Preferred Options" consultation will be undertaken in January to February 2017, forming the first formal stage in the Local Plan's preparation (under Regulation 18 of the Local Planning Regulations).
- 1.6 The LPIO (January/February 2016) sets out the key contextual matters for the Local Plan, for which the increasing population in Medway is considered to be most central. In total there are 22no. matters in the LPIO document, and a number of questions posed.

- 1.7 In addition, the LPIO considers a number of potential approaches that could be taken to form a development strategy for a new Local Plan, based on identified development principles (LPIO, para 27.8). The potential approaches include:
- High density town centre and riverside development;
 - Incremental suburban development;
 - Planning growth of existing settlements;
 - Freestanding settlements;
 - Urban extensions;
 - Role of custom and self-build housing; and
 - Chatham Town Centre.
- 1.8 Whilst the consultation is welcomed, it should be recognised that the LPIO does not contain any detailed policies or identify specific development sites (excluding reference to the unknown outcome of Lodge Hill) that can be assessed, and therefore due to the “broad” nature of the questions posed, the benefit of the consultation responses to MC will be limited in this regard.
- 1.9 The LPIO consultation has not been accompanied by a suite of Evidence Base documents that should inform the production of a new Local Plan. Indeed, the Strategic Housing and Economic Needs Assessment (SHENA), the only Evidence Base document due for publication alongside the LPIO consultation (in January 2016), was not made publicly available until 19 February 2016, i.e. 6 weeks from the start of the consultation period and 1 week from its close.

iii) Content of Representations

- 1.10 The LPIO (January/February 2016) and the strategy for the preparation of a new Local Plan, has been assessed on the basis of National policies as set out in Section 2.0. These representations are structured as follows and provide a response to the following matters/questions:
- Section 2.0 – National Policy
 - Section 3.0 – Housing/Questions 4, 5 & 6
 - Section 4.0 – Environment/Questions 30 & 32
 - Section 5.0 – Open Space/Question 52
 - Section 6.0 – Rural Issues/Questions 40 & 41
 - Section 7.0 – Agricultural Land/Question 56
 - Section 8.0 – Transport/Question 72
 - Section 9.0 – Deliverability/Question 77
 - Section 10.0 – Development Strategy/Questions 81 & 82

1.11 In summary, these representations set out the following comments:

- The North Kent SHENA identifies the Objectively Assessed Needs for Medway as being 1,281 dwellings per annum over the period 2012-2037 which does not represent the full OAN for Medway over the Plan period (2012-2035);
- Development of the 'Land South of Lower Rainham Road, Rainham' would constitute a sustainable form of development. The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151);
- The future growth strategy for the Medway area should make a provision for development at the Site in the new Local Plan.

2.0 NATIONAL POLICY

i) National Policy and Plan Making

- 2.1 The National Planning Policy Framework (NPPF) was published in March 2012. In general terms, the NPPF advocates a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development.
- 2.2 The NPPF (para 18 2) requires that , *"A local planning authority should submit a plan for examination which it considers is "sound" – namely that is":*
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 2.3 Paragraph 156 of the NPPF states that LPAs should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- The homes and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - The provision of health, security, community and cultural infrastructure and other local facilities; and
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.4 Paragraph 157 advocates that crucially Local Plans should:

- Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- Be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- Be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- Identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- Identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- Contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals (para 158).

2.6 The NPPF directs LPAs to prepare an evidence base which indicates that objectively assessed needs for market and affordable housing are met. LPAs should plan for a housing mix which takes into account *"housing demand and the scale of housing supply necessary to meet this demand"* (para 159). Household and population projections should also be a key consideration, taking into account of migration and demographic change (para 159).

ii) National Policy and Housing Need

2.7 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, 'Objectively Assessed Needs' (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework,

including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.

- 2.8 LPAs must plan for a mix of housing that *"meets housing and population projections, taking account of migration and demographic change"* (para 159). Significant weight should also be placed on the need to support economic growth through the planning system (para 19).
- 2.9 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

(Reference ID: 2a-015-20140306)

- 2.10 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

iii) Duty to Co-operate

- 2.11 The 'Duty to Co-operate' as provided for in Section 110 of the Localism Act 2011, came into effect on 15 November 2011. The Duty was introduced under the 2011 Act to address the impact of the loss of the "top-down" effect from the Regional Spatial Strategy (The South East Plan) and to offer a transparent way in which authorities should relate to one another on cross boundary issues. The Duty is now shared between authorities requiring them to collaborate on cross-boundary matters and issues of sub-regional and regional importance, especially housing provision and related infrastructure issues.

- 2.12 Section 33A(2)(a) requires that local authorities “engage constructively, actively and on an ongoing basis” in the plan-making process. The NPPF refers to the ‘Duty to Co-operate’ in paragraphs 157 and 178-181. Crucially, paragraph 157 of the NPPF states that *“Local plans should be based on cooperation with neighbouring authorities...”*.
- 2.13 Paragraphs 178-181 are clear in directing LPAs as to the importance of the ‘Duty to Co-operate’ and the proactive approach necessary to ensure a collaborative approach to reflect individual Local Plans. Paragraph 179 states *“joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework”*.
- 2.14 Paragraph 182, as above, provides that an Inspector should assess *“whether the plan has been prepared in accordance with the Duty to Cooperate”* such that compliance with the Duty must also be reflected in the assessment of soundness.
- 2.15 In addition, in March 2014 the CLG published the PPG, to “reflect and support” the NPPF. The PPG contains considerable guidance on the Duty to Co-operate. This is largely due to the fact that the Duty to Co-operate has proved to be a contentious part of the NPPF, with numerous Local Plans being scrutinised at examination due to failure to fulfil the Duty.
- 2.16 The guidance emphasises the importance for LPAs to work together; stressing that *“Cooperation between local planning authorities, county councils and other public bodies should produce effective policies on strategic cross boundary matters. Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local planning authorities have approached others”* (Reference ID: 9-010-20140306).
- 2.17 The PPG also states that LPAs must *“engage constructively, actively and on an ongoing basis to maximise the effectiveness of the plan-making process”* (Reference ID: 9-001-20140306). The ultimate outcome of the engagement should be the production of effective policies on cross boundary strategic matters.
- 2.18 In summary, there are two aspects to the ‘Duty to Co-operate’:
- ‘Duty to Co-operate’ – the s33A legal test is a ‘process’ preparation test. The Duty is incapable of modification at an Examination. Therefore, this is one of the first things that has to be examined because, if the legal requirement is not met, then the Inspector must recommend non adoption of the Plan;

- Collaborative Joint Working – an aspect of soundness. It is primarily concerned with the 'positively prepared' and 'effectiveness' soundness test set out in paragraph 182 of the NPPF. This relates to outcome rather than process.

2.19 The 'Duty to Co-operate' between LPAs is a clear requirement of National planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in paragraph 156 (para 178).

2.20 In addition, paragraph 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged (para 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate' during the plan-making process (para 181).

3.0 HOUSING

Question 4 – Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

- 3.1 We do not consider that the approach and conclusions in assessing the housing need for Medway over the Plan period have been appropriately assessed. We do not consider that the housing need, as calculated by MC, is “sound” and in line with National policy.
- 3.2 The NPPF directs LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and identify the scale, mix and range of tenures that the local population is likely to meet over the Plan period. In addition, LPAs should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land (NPPF, para 159).

i) Medway’s OAN Work

- 3.3 MC has jointly produced a North Kent SHENA with Gravesham Borough Council, comprising a Baseline Report (March 2015) and SHMA (November 2015).
- 3.4 The North Kent SHENA identifies OAN for Medway as being 1,281 dwellings per annum (dpa) over the period 2012 – 2037 (equating to 32,025 dwellings in total) based on the result of the CLG 2012-based household projection adjusted take account of 2013 and 2014 Mid-Year Population Estimates. This level of housing per annum (i.e. 1,281dpa) has been taken forward in the LPIO (January/February 2016) to represent over the period 2012 – 2035.
- 3.5 The LPIO (January/February 2016) (para 1.3) directs that the OAN for Medway is 29,463 dwellings over the period 2012 – 2035, based on the annual figure of 1,281 dwellings. This figure is below the level of need identified by the CLG 2012-based household projections which identifies 29,447 households equivalent to 30,410 dwellings over the same period. The PPG states that the CLG figure should be used as the ‘starting point’ estimate of need (Reference ID: 2a-015-20140306). The ‘starting point’ usually requires adjustment to address suppressed household formation and suppressed migration trends.
- 3.6 Overall, it is considered that the LPIO (January/February 2016) does not seek to meet the correct OAN for Medway. It is considered that the full OAN could be in the region of 1,489 dpa. This matter should be addressed in the next iteration of the Local Plan as the current position is considered to be “unsound”.

ii) Under delivery of housing

- 3.7 The Consultation on Proposed Change to National Planning Policy (CPCNPP) (December 2015) indicates that CLG are intending to amend National planning policy to ensure appropriate action is taken where there is a significant shortfall between the homes provided for in Local Plans and the houses being constructed. A housing delivery test is proposed (as outlined in the Spending Review and Autumn Statement 2015 (HM Treasury, November 2015)). It is envisaged that this approach would compare the number of homes that LPAs set out to deliver in its Local Plan against the net additions in housing supply within the LPA area (CPCNPP, para 30). Consequently, LPAs shall have to ensure that OAN figures are suitably robust and achievable in line with current National planning policy and the emphasis that is being placed on delivery rates.
- 3.8 This matter is particularly pertinent for MC following a recent Appeal Decision (APP/A2280/W/15/3002877) in which the Planning Inspector concluded that the substantial shortfall in previous years in housing delivery when set against the housing requirements, represented persistent under delivery (NPPF, para 47).
- 3.9 The CPCNPP considers that continued significant under-delivery of housing identified over a sustained period, as is the case for MC, should be addressed by appropriate action. The CPCNPP considers that one approach to addressing under delivery rates could be to identify additional sustainable sites if it has been shown that the existing approach is not delivering the housing required. Such sites would need to be in sustainable locations, with appropriate infrastructure and which can be demonstrated as deliverable. To deliver such an approach, it is recognised that collaboration between developers and local communities, undertaking appropriate consultation would be required to undertake policy reviews, enabling additional land in sustainable locations to come forward (CPCNPP, paras 31-33).

Question 5 – What do you consider to be the appropriate housing market area for Medway?

- 3.10 The SHMA (November 2015) defines the Housing Market Area to comprise Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling.
- 3.11 MC should seek to work collaboratively under the 'Duty to Co-operate' to address the housing needs of neighbouring authorities and how housing can be delivered in the HMA that is influenced by other HMAs.

Question 6 – Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

- 3.12 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012 – 2037), the Local Plan period (2012 – 2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744dpa), which would constitute 58% of MC's identified OAN figure of 1,281dpa. The PPG advises that an increase in the total Local Plan housing figure should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).
- 3.13 The need for affordable housing should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be given to ensure sustainable development and the deliverability of the Plan (para 173).
- 3.14 We would consider that based on the North Kent SHMA (November 2015), seeking the provision of 25% affordable housing is appropriate. An increase of the housing requirement to meet the full OAN figure would both be in line with National policy (NPPF, para 47) and therefore "sound", and contribute to achieving a greater number of affordable dwellings.

4.0 ENVIRONMENT

Question 30 – What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

- 4.1 We would consider that one of the ways in which MC could strike a balance between securing and strengthening Medway's environment and addressing the area's development needs would be to allocate land that is capable of avoiding significant harm on biodiversity, or land that is capable of providing mitigation in accordance with the NPPF (para 118) such as incorporating open space that would be readily accessible on foot to proposed residents, thereby reducing development pressure on designated sites such as SPA or Ramsar.

Question 32 – What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

- 4.2 Paragraph 113 of the NPPF directs that distinction should be made between the hierarchy of international, national and locally designated sites, so that protection is proportionate with such status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.
- 4.3 The NPPF (para 113) directs that LPAs should set 'criteria based' policies against which proposals in protected landscape areas will be judged. It should be noted that in a recent Appeal Decision (APP/A 2280/W/15/3002877), the Inspector noted that Medway Landscape Character Assessment (MLCA) (2011), in seeking to recognise and protect areas of recognised local landscape character, was not inherently inconsistent with the NPPF, however "the ALLI designations were not based upon a landscape character assessment" (paragraph 23) and therefore did not fully accord with the NPPF in this respect.
- 4.4 To be 'Consistent with National policy', the new Local Plan for Medway should set 'criteria based' policies against which proposals in protected landscape areas can be judged. In order for the new Local Plan to be 'Justified' in this respect, we recommend that a Medway-wide landscape review is undertaken to inform both the spatial strategy for the area and landscape based policies.

5.0 OPEN SPACE

Question 52 – Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

- 5.1 We consider that open space provision for new development should take a balance between the two approaches. The provision of on-site open space should be considered within the context of each development site, assessing the potential feasibility of a development site to provide for on-site open space provision or whether contributions towards maintaining and enhancing the existing estate is deemed more appropriate.

6.0 AGRICULTURAL LAND

Question 56 – What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

- 6.1 The NPPF (para 112) directs that LPAs should take into account the benefits of the best and most versatile agricultural land. Where significant development is necessary on agricultural land, LPAs should seek to use areas of poorer quality land in preference to that of higher quality.
- 6.2 The NPPF does not preclude development on BMV land and a significant proportion of land in close proximity to urban areas is BMV. Therefore, MCs should seek to secure the area's development needs and achieve the economic, social and environmental dimensions of sustainable development without precluding development on BMV land. This includes the Site, which is sustainably located and comprises predominantly derelict land with overgrown decayed orchard.
- 6.3 Further to the above, the Site is approximately 4.4 hectares in size and is not therefore considered to amount to 'significant' development in the context of the NPPF (para 112).

7.0 TRANSPORT

Question 72 – What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

- 7.1 The NPPF (para 29) highlights the importance for the transport system to be balanced in favour of sustainable transport modes and providing users with a choice on how they travel, whilst acknowledging that different measures will be required and opportunities will vary from urban to rural areas.
- 7.2 The new Local Plan for Medway should contain both transport policies and development allocations that support the achievement of sustainable development by focussing new development within or in close proximity to existing built up areas where existing infrastructure is in place. The Site is in close proximity to the Greenwich University at the Strand, and also within proximity to Rainham Railway Station and Rainham settlement itself.
- 7.3 The Site is served by a variety of modes of transport, including pedestrian, cycle and public transport, in addition to the private motor car. Bus Route 190 passes north of the Site along Lower Rainham Road and National Cycle Network Route 1 extends north of Lower Rainham Road from the north east corner of the Site. The Site is also in close proximity to Public Right of Way GB18.
- 7.4 North Rainham was one of a limited number of areas that were assessed as a realistic option for strategic housing growth as part of the previous Core Strategy (Medway Core Strategy Major Sites Assessment, October 2013). It is considered that the Site is in a sustainable location, should be allocated for development and would bring the added benefits of additional services and infrastructure upgrades to this area.

8.0 DELIVERABILITY

Question 77 – Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

- 8.1 We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account different viability between areas of Medway.
- 8.2 The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development (para 173). The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened"* (NPPF, para 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing, when taking account of the normal cost of development and mitigation, should provide competitive returns to a landowner/developer to enable the development to be deliverable.

9.0 DEVELOPMENT STRATEGY

Question 81 – Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

- 9.1 The type of development entitled 'Incremental Suburban Development' states that incremental growth can make it *"more difficult to plan for improvements to road and community facilities"* (para 27.18). We consider that this type of development can in fact provide a credible contribution to the area's development needs alongside other development type options. Funding contributions can be secured in accordance with the Community Infrastructure Levy Regulations 2010 where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.
- 9.2 A variety of development types are needed to meet the area's development needs and can assist in creating sustainable, inclusive and mixed communities as required in National policy (para 50).

Question 82 – Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

- 9.3 We consider that a range of development types, as outlined within LPIO (January/February 2016), should be utilised in meeting Medway's growth requirements. This should be based on an overarching vision of sustainable development, as underpinned by National and local planning policy. When selecting development types, it is important to consider the aspirations and requirements of National policy.
- 9.4 The NPPF encourages LPAs in plan-making to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. LPAs should plan for a mixed of housing based on current and future demographic trends, market trends and the needs of different groups in the community that is required in particular locations (NPPF, para 50).

- 9.5 North Rainham was one of a limited number of areas that were assessed as a realistic option for strategic housing growth as part of the previous Core Strategy (Medway Core Strategy Major Sites Assessment, October 2013). This demonstrates that the LPA seriously considered growth in North Rainham to help Medway meet its housing need. The scope of the assessment was to identify whether areas such as North Rainham could be a reasonable alternative to development at Lodge Hill.
- 9.6 Strategic development at North Rainham was discounted at this time over concerns that the area was insufficiently sized to provide a reasonable alternative to Lodge Hill. Strategic expansion at North Rainham was also questioned for its deliverability and proximity to the Medway Marshes SPA and Ramsar site.
- 9.7 Expansion at North Rainham is considered to be an important component of meeting the area's development needs and it is clear from the scale of land submitted for the SLAA (2015) that significant land is available. It is also considered that development pressures on the Medway Marshes SPA and Ramsar site can be mitigated through use of the Riverside Country Park and on-site measures. Development at the Site would provide an opportunity to deliver a significant residential development of approximately 130 no. dwellings to assist in meeting Medway's housing needs consisting of a mixed residential development comprising: over 60's retirement courtyard with bungalows for older people; and a mix of 2, 3 and 4 bedded homes, including starter homes for first time buyers, family homes and quality apartments providing downsize opportunities for local people.

10.0 LAND SOUTH OF LOWER RAINHAM ROAD, RAINHAM

i) The Site and its Surroundings

- 10.1 The Site comprises a single land parcel to the south of B2004 Lower Rainham Road and is approximately 4.4 hectares in size. It is currently private open land and woodland in the sole ownership of the Directors of Pickhill Development Ltd. Vehicular and pedestrian access to the Site is currently via an access point from B2004 Lower Rainham Road.
- 10.2 The Site lies in North Rainham and to the east of A289 Yokosuka Way, which forms the current eastern extent of Gillingham. Immediately to the south of the Site lies woodland and beyond that Grange Road (a single track lane), agricultural land and approximately 25no. dwellings at Ladds Corner. Further to the south of the Site is the Invicta Business Centre, the northern boundary of which is the North Kent (Canterbury to London) Railway line. To the east of the Site are a number of former agricultural buildings that have been converted into dwellings, and to the west of the Site lies further agricultural land, which is being promoted through the SLAA process for residential development (Taylor Wimpey – 'Land at Mill Hill, Gillingham'). A number of farm buildings and detached houses also lie to the west of the Site. To the north of the Site lies the B2004 Lower Rainham Road, agricultural land and a small number of dwellings, including 3no. Grade II Listed Buildings, and beyond which lies the Riverside Country Park providing informal recreation opportunities.
- 10.3 As such, whilst the Site is currently outside of the settlement boundary of the Medway urban area it is very close to both existing residential and employment development. Therefore, the Site lies within a sustainable location in close proximity to the adjoining the Medway urban area.
- 10.4 The Site's context is predominantly unused agricultural land with some areas set to stable and horse pasture, and is accessed by a number of roads leading from B2004 Lower Rainham Road with scattered and concentrated residential dwellings surroundings. This area includes 2no. Conservation Areas (separated from and to the east of the Site). This area is one of a limited number of areas, immediately adjoining the Medway urban area, that could accommodate strategic development to meet future housing needs.

ii) Development Proposals

- 10.5 It is Pickhill Development Ltd's intention to promote the Site for residential use comprising a mix of dwelling types and sizes including an element of affordable housings. It is anticipated that a total of approximately 130no. dwellings could be delivered on the Site in addition to car parking provision and open space. Access to the Site can be obtained (as existing) from B2004 Lower Rainham Road. The Site is in a sustainable location within close proximity to the Medway urban area and the Riverside Country Park.
- 10.6 The Site could be developed in isolation given its size, continuous road frontage and location between existing built form. However, the Site could also be developed as part of a wider strategic development to the North of Rainham.

ii i) Sustainable Development

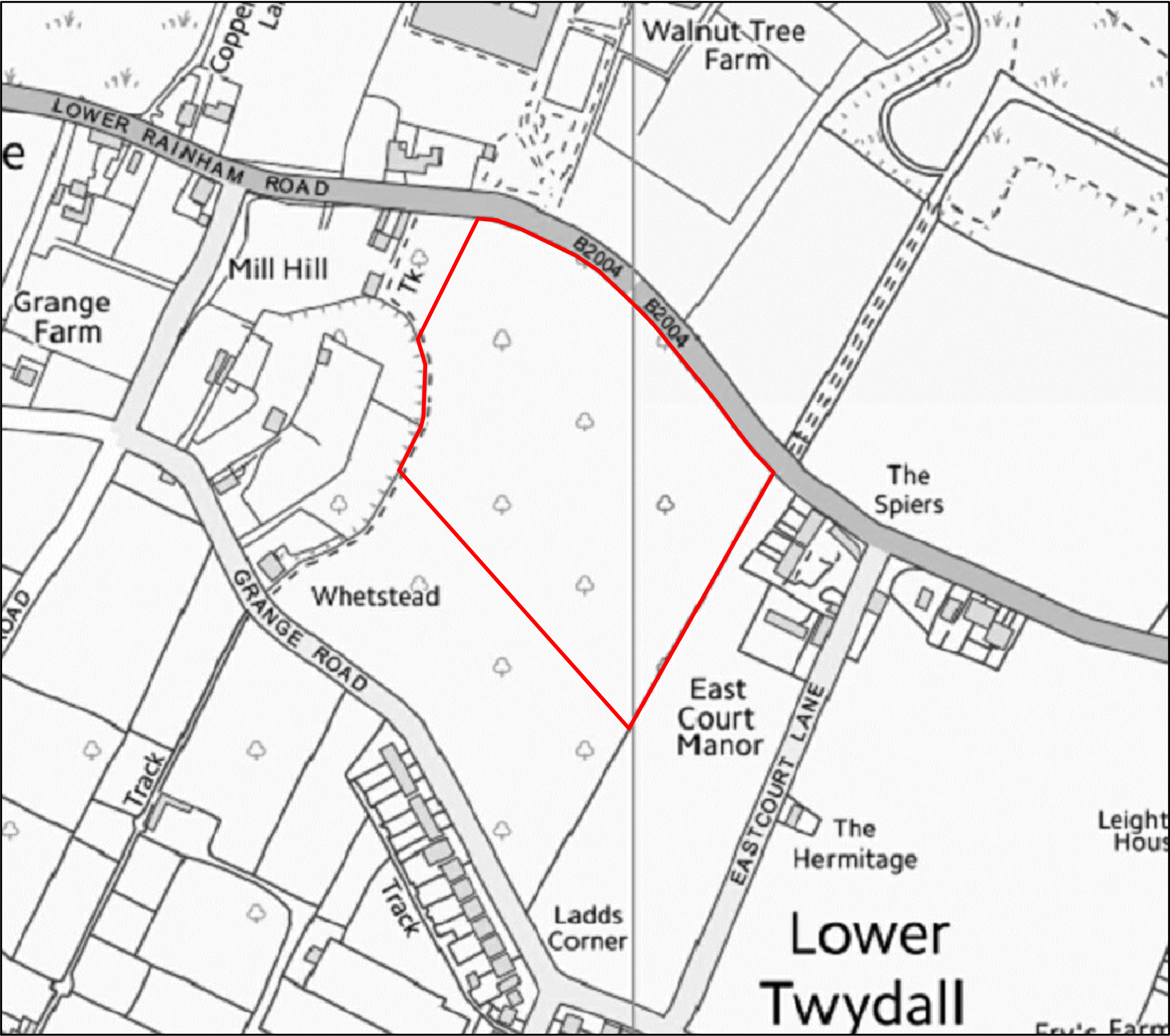
- 10.7 The NPPF and PPG puts sustainable development at the heart of the planning system (NPPF, para 7) for both plan-making and decision-taking, and describes it as covering three main aspects including economic, social and environmental.
- 10.8 Development of the Site would constitute a sustainable form of development. The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151).
- 10.9 The Site is assessed to be sustainable development located in close proximity to the existing urban area. The Site is accessible, located adjacent to an existing local road network and in close proximity to the strategic highway network, with A289 Yokosuka Way approximately 0.4km to the west of the Site linking to Chatham town centre, the A2 and M2.
- 10.10 The development would meet the three elements of sustainable development, as set out in the NPPF. Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase with Pickhill Developments Ltd using its network of established skilled and semi-skilled Kent based contractors and materials sourced by local suppliers where Pickhill Developments Ltd have many established accounts. The Site has the potential to contribute towards the delivery of much needed housing within Medway and deliver a mix of housing types in accordance with the NPPF (para 47). The Site is currently available for development, would offer a suitable location for development and has a realistic prospect of housing being delivered on the Site

within 2 years to meet short term development needs and is forecast to generate around £10 million to the local economy.

11.0 CONCLUSIONS

- 11.1 Whilst we support Medway's Council intention to undertake a form of public consultation on a new Local Plan for the area, the LPIO (January/February 2016) is limited in content and is "broad" in the nature of questions it poses.
- 11.2 Based on the information available, we consider that there is further work to be done in order to ensure MC is working towards a "sound" Local Plan. Notably, the current identified housing figure of 1,281 dwellings over the period 2012-2037 needs to be revisited to identify full OAN, as required by National policy. The OAN should also take into account the persistent under-delivery of housing. The CPCNPP (December 2015) considers that one approach to addressing under delivery rates could be to identify additional sustainable sites if it has been shown that the existing approach is not delivering the housing required.
- 11.3 It is also vital that the evidence base, which should inform and underpin the Local Plan, is made available prior to any next stage of formal consultation on the Local Plan. Without these, MC will be unable to make an informed decision on future growth strategies for the area, nor will the public be able to make informed comments which in turn would assist MC.
- 11.4 Development of the Site would constitute a sustainable form of development. The NPPF is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development (NPPF, para 151).
- 11.5 The sustainable location of the Site within close proximity to the boundary of the Medway urban area makes the Site a sustainable location for residential development. The built up character of Medway has led to limited opportunities to allocate larger sites for residential development within the urban area. The Site provides the opportunity to deliver development close to the urban area in a sustainable location.
- 11.6 The future growth strategy for the Medway area should therefore make a provision for development at the Site in the new Local Plan.

Appendix A
Site Location Plan



The scaling of t
Revision

LEGEND

Site B

Project
Land North

Drawing Title
Site Locatic

Date
06.05.14
Project No
23648



Architecture • L
Environmental

b.

Offices at Reading London Bristol Cai

Appendix B:

Pickhill Developments Ltd Presentation to Medway Council (11 December 2014)



Local Developers Providing a Local Solution



About Us



- Local Kent builders and developers
- Over 50 years experience: first NHBC members
- Built and developed 500 properties
- Use local labour and local suppliers
- Own and operate **www.Pickhill Business Centre.com**
 - 15 companies employing over 300 staff on site
- Engage directly with local councils (Staplehurst and Tenterden/Ashford BC) to meet local council aims



Site History

- Owned by Pickhill Developments for 30 years
- Neighbouring areas: housing developments and conversions to east, west and south
- Not used as agricultural land over recent years
 - Area of landscape but not AONB
- Lower Rainham Road forms northern site boundary and a key artery road for Rainham and Gillingham through to Chatham
- Good route accessibility with major road frontage and sustainable



**BARTON
WILLMORE**

Medway
Serving You

Development Proposal

- Circa 130 dwelling including truly affordable homes for local people
- Mixed with over 60's retirement courtyard with bungalows for older people
- BUT flexible to meet Medway Council's objectives - could include element of employment development
- Typically we also build/refurbish to rent to local people



**BARTON
WILLMORE**

Medway
Serving You

Name: Carolyn

Reference

90

Organisation

Apcar Smith Planning

On Behalf Of

Type of Consultee

Developer/Consultant

APCAR SMITH PLANNING

Chartered Town Planning Consultants

Our Ref: CA/grc/2886

E-mail: planning.policy@medway.gov.uk

Planning Policy, Regeneration, Community and Culture
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR
August 2015

24 February 2016

Dear Sirs

Issues and Options Consultation Document

We wrote to you on 3 August 2015 in respect of the Medway Call for Sites concerning Samuels Towers (also known locally as Scammel Towers) Block A and B, Longhill Avenue, Chatham with your "Call for Sites" pro-forma. On the pro-forma we referred to a site area of approximately 1.3 hectares and a development potential of 50 plus dwellings. On the pro-forma and in our covering letter we referred to the potential for demolition and comprehensive redevelopment drawing attention to the anti-social problems associated with the site and the detrimental visual impact that the two existing blocks have on the setting of Chatham and its adjoining open spaces.

Our client's site has been listed in your documentation as Site Reference 1112. We note that on the Site Assessment Pro-Forma you have listed the site as having development potential for 69 residential units. I have been advised by Ross Crayford that this figure would be based on a consideration of density which, I understand, for this location you consider should be approximately 50 dwellings per hectare.

It is clear from an OS extract that all surrounding land, apart from Longhill Avenue itself, is developed at a higher density than this. Therefore we consider that the principle of a higher density development should be acceptable as it will be in keeping with the surrounding area. Clearly any development would still have to be considered in terms of visual amenities, neighbours amenities, parking and highways issues. Having said this we understand that you need to use some ball park figure for assessing the development potential of a site. Our concern is that any figure that

Cont'd/.....

Principal: Carolyn Aparc BA Hons. MRTPI

may be referred to in any policy documents may subsequently be taken by those considering a planning application in due course as a maximum. If the Council are to meet their housing targets I would suggest that the Local Plan makes it clear that any specific site allocations and the development potential set against them should be considered as a minimum and not a maximum threshold, subject of course to all normal development control considerations.

The Issues and Options Document has our client's site (Ref: 1112) listed in Appendix VII as one of the suitable SLAA sites but refers only to 12 units. From our discussion with Ross Crayford we understand that this figure should be the net increase.

From the planning history we note that there is permission for 43 units in the two blocks (initially 37 flats in the two blocks were approved in 2001; 3 further flats were then approved in Block A in 2004 and a further 3 in Block B in 2005). Our client advises that there are in fact 44 flats. We have yet to ascertain where the one extra unit has come from.


Given this, and going by the lawful number of flats (43) we believe that the figure of 12 in Appendix VII should be increased from 12 to 26 if it is to be the net increase based on your density assessment alone.

Whilst a detailed assessment of the potential of the site is at an early stage, if the two existing blocks (with their issues in respect of visual amenity and anti-social problems) are to be demolished the financial viability of demolition needs to be taken into consideration. An initial indication is that for the two blocks to be demolished they need to be replaced by somewhere in the order of 88 units overall on the site. If a lesser figure is insisted upon it will necessitate the blocks remaining with the additional dwellings being provided elsewhere on the site. For the sake of the local community we believe that it would be more appropriate to demolish these block allowing a better quality scheme across the site that will not be a blot on the landscape.

Therefore, when considering the capacity of the site in more detail for the emerging Local Plan we consider that this should be taken into consideration and would ask that the potential for the site be raised in order to encourage the full redevelopment scheme.

It is our client's intention to shortly submit a formal request for pre-application advice along the lines outlined above – demolition of the two towers and a comprehensive redevelopment of the site for 88 units.

Yours faithfully



Carolyn Apcar

c.c. D Peters Esq.,

Name: Ruby Wilkinson

Reference

91

Organisation

Barton Willmore

On Behalf Of

Medway Preservation Ltd

Type of Consultee

Developer/Consultant

LAND NORTH OF COMMISSIONERS ROAD, STROOD

MEDWAY COUNCIL LOCAL PLAN ISSUES AND OPTIONS 2012 - 2035

CONSULTATION PAPER

PLANNING AND TECHNICAL RESPONSE

ON BEHALF OF
MEDWAY PRESERVATION LTD

February 2016

LAND NORTH OF COMMISSIONERS ROAD, STROOD
ISSUES AND OPTIONS CONSULTATION PAPER
PLANNING AND TECHNICAL RESPONSE
ON BEHALF OF
MEDWAY PRESERVATION LTD

Project Ref:	25498	25498/A5
Status:	DRAFT	FINAL
Issue/Rev:	01	01
Date:	26 February 2016	29 February 2016
Prepared by:	Ruby Wilkinson	Ruby Wilkinson
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Ref: 25498/A5/RW/KM/mg/djg
Date: 29 February 2016

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APPENDICES

APPENDIX 1	SITE BOUNDARY PLAN
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1.0 INTRODUCTION

1.1 This statement has been prepared on behalf of our Client, Medway Preservation Ltd, and sets **out comments in response to Medway Council's** (MC) Issues and Options 2012-2035 Consultation Document (January 2016).

1.2 **The Issues and Options (January 2016) sets out key contextual matters that will be 'the drivers'** for the New Local Plan and further raises questions on the most appropriate approaches and locations for supporting sustainable growth in Medway. It sets out the following potential approaches to a development strategy for the Local Plan:

- High density town centre and riverside development;
- Incremental suburban development;
- Planned growth of existing settlements;
- Freestanding settlements;
- Urban Extensions;
- Role of custom and self-build housing; and
- Approaches to the town centres.

1.3 MC recognises that its Local Plan must respond to key issues and opportunities including:

- Accommodating the projected growth **of a 20% increase in Medway's population, and** its changing demographics;
- Realising opportunities to drive economic success and address inequalities across Medway; and
- Develop a Modern Medway, delivering quality through regeneration and investment, whilst protecting the best of its past and its natural environment.

1.4 Our Client has land interests at Land North of Commissioners Road, Strood (hereafter referred to as **'the Site'**), which was included in the **Strategic Land Availability Assessment (SLAA)** (November 2015) (SLAA Ref: 0711). A site boundary is included at **Appendix 1**.

i) National Planning Policy Framework

1.5 Notwithstanding our Client's specific land interests, these representations have been prepared in recognition of the prevailing planning policy – **in particular Government's guidance as set out in the National Planning Policy Framework (NPPF)** (March 2012) and Planning Practice Guidance (PPG) (March 2014).

- 1.6 In general terms, the NPPF advocates a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development.
- 1.7 The NPPF also requires LPAs to use their evidence base to ensure that its Local Plan meets the full 'Objectively Assessed Housing Needs' (OAN) for market and affordable housing in the Housing Market Area (HMA), unless any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted (**Para 14**).
- 1.8 LPAs should 'boost significantly' the supply of housing by using their evidence base to ensure that their Local Plan meets the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area as far as consistent with the policies set out in this Framework (**para 47**).
- 1.9 LPAs also have a 'duty to co-operate' on housing issues crossing administrative boundaries, particularly strategic priorities.
- 1.10 In the context of these representations, **Para 182** NPPF requires that, '*A local planning authority should submit a plan for examination which it considers is "sound"*' – namely that is:
- **Positively prepared** – the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 1.11 These representations focus on addressing MC's housing provision and its Duty to Cooperate, and seeks to promote development of the Site on Commissioners Road, Strood. The representations demonstrate that the Site is not in use as Public Open Space and provides sustainable development in accordance with NPPF.

1.12 The remaining section of these representations are set out as follows:

- Section 2 – **Consideration of MC's proposed housing target and Duty to co-operate;**
- Section 3 – Demonstrates the suitability of the Site for residential development and inclusion in the emerging Local Plan; and
- Section 4 – Conclusion.

2.0 HOUSING PROVISION AND DUTY TO CO-OPERATE

i) Current Housing Targets

2.1 The Issues and Options sets out the following:

- The latest data released by the Government indicates that Medway will see a 21.8% increase in its population by 2037, rising to 322,700 people by 2035;
- There is an OAN of 29,463 dwellings (1,281 dpa) for the plan period (2012-2035); and
- The SHMA (2015) identified a higher level of demand for affordable housing – 17,112 dwellings over the plan period. It is stated that initial analysis indicates that a percentage of 25% affordable housing would be deliverable on sites of over 15 units, albeit considering land values and development costs.

ii) Strategic Housing and Economic Needs Assessment (SHENA) (March 2015)

2.2 Medway Council and Gravesham Borough Council jointly commissioned a Strategic Housing and Economic Needs Assessment (SHENA) (2015) to identify development needs for housing, employment and retail land. It was jointly prepared because of the degree of interdependence in housing and employment markets. Some of the outcomes for Medway are set out below:

- 2013 internal migration flows out of Medway reveal the strongest relationship with Maidstone, Swale and Tonbridge and Malling;
- **The analysis of Medway's net migration gains and losses suggests that Medway has a** closer local relationship with authorities within the Kent region than Gravesham. Although there is a relationship with London evident in net migration gains;
- The latest 2012-based SNPP forecast a population of 326,800 by 2037 in Medway, an increase of 21.8%;
- Based on the latest 2012-based household projections for Medway there are forecast to be 139,900 households (29% increase); and
- Levels of population and household growth will have significant implications for the housing, employment and retail requirements for both authorities.

iii) Importance of Establishing the OAN

- 2.3 In order for MC's Local Plan to be found sound, it is vital that the full OAN is identified in accordance with **para. 47** of the NPPF. It is considered that the 1,281dpa figure does not represent the full OAN as required in the NPPF and PPG. Barton Wilmore consider that a Full OAN could be in the region of 1,489dpa.
- 2.4 Once the full OAN is identified, MC will then need to assess whether the full OAN can be met, in the context of **Para 14** of the NPPF. As above, this requires Local Plans to meet full OAN, **unless other policy factors within the NPPF "significantly and demonstrably" outweigh the benefits of that housing provision, or policy means that development should be restricted** (Footnote 9 of the NPPF). Such policies include those relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (of Broads Authority); designated heritage assets; and locations **at risk of flooding or coastal erosion. This is effectively the 'planning balance' exercise.**
- 2.5 In order to undertake a robust planning balance exercise, MC must first establish its full (policy off) OAN, as the judgement as to whether impacts of housing provision "significantly and demonstrably" outweigh the benefits will be determined in part by how large the unconstrained need is in the first place- i.e. the weight to be given to the benefits.
- 2.6 The importance of the "two stage" approach is highlighted in the Court Case Gallagher Homes Limited and Lioncourt Homes Limited v Solihull Metropolitan Borough Council [2014], noting:
- **Unlike its predecessor (which required a balancing exercise involving all material considerations, including need, demand and relevant policy factors), the NPPF requires plan-makers to focus on full objectively assessed need for housing, and to meet that need unless (and only to the extent that) other policy factors within the NPPF dictate otherwise. That, too, requires a balancing exercise – to see whether other policy factors significantly and demonstrably outweigh the benefits of such housing provision – but that is a very different exercise from that required pre-NPPF (para 97);**
 - **The balancing exercise required by paragraph 47 cannot be performed without being informed by the actual full housing need (para 94);**
 - **Numbers matter; because the larger the need, the more pressure will or might be applied to infringe on other inconsistent policies. (para 94)**

- 2.7 In order to seek to meet the full OAN, MC should be supportive of proposals on sites that are in sustainable locations, within the existing settlement boundary, and which are not subject to constraints. It is noted that the Site is identified as Public Open Space on the MC Proposals Map (adopted 2003). The Proposals Map **is therefore increasingly “out-of-date” in planning policy terms.** Moreover and as detailed in Section 3.0 of these representations, the Site has never been used publically and the existing vegetative screening means that it provides no visual amenity.

iv) Duty to Co-Operate

- 2.8 In accordance with the NPPF, Medway has a duty to co-operate on housing issues crossing administrative boundaries, particularly strategic priorities. Section 33A(2)(a) requires that local authorities **“engage constructively, actively and on an ongoing basis”** in the plan-making process.

- 2.9 The PPG advises:

Local planning authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. If a local planning authority cannot demonstrate that it has complied with the duty then the Local Plan will not be able to proceed further in examination.

Local planning authorities will need to satisfy themselves about whether they have complied with the duty. As part of their consideration, local planning authorities will need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters.

(Paragraph: 001Reference ID: 9-001-20140306)

- 2.10 Furthermore, the PPG advises as to ‘*What actions constitute effective co-operation under the duty to co-operate?*’ and states:

The actions will depend on local needs which will differ, so there is no definitive list of actions that constitute effective co-operation under the duty. Co-operation should produce effective policies on cross boundary strategic matters. This is what local planning authorities and other public bodies should focus on when they are considering how to meet the duty. Local planning authorities should bear in mind that effective cooperation is likely to require sustained joint working with concrete actions and outcomes. It is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone. (our emphasis)

(Paragraph: 011 Reference ID: 9-011-20140306)

2.11 Local Plans are expected to meet:

The full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. (NPPF, para 47)

2.12 Paragraph 159 of the NPPF and the supporting PPG (ID2a) confirm how OAN should be assessed across the Housing Market Area (HMA), and not restricted to single local authority boundaries.

2.13 The Issues and Options document (2016) reveals that Medway is engaged in the South East Local Enterprise Partnership (LEP), and the Thames Gateway Kent Partnership at a north Kent level. It is suggested that Medway has a complex HMA with Gravesham, Swale, Maidstone and Tonbridge and Malling.

3.0 LAND NORTH OF COMMISSIONERS ROAD

- 3.1 The Site is approximately 3.5ha, located on the north Side of Commissioners Road, Strood **(Appendix 1)**. The Site was previously used as a quarry which is visible from the steep chalk sides at varying levels. **The base of the Site is a relatively level surface of rough 'mown grass'**, chalk from the quarry sides and peripheral trees line the embankment to Commissioners Road and the upper part of the quarry face.
- 3.2 A large employment site (Medway City Estate) is situated to the south-east of the Site and a Grade II* All Saints Church to the north. The Site lies adjacent to a recreation ground on its north western boundary. The Site is also adjacent to the Frindsbury and Manor Farm Conservation Area.

i) Open Space Designation

- 3.3 The NPPF defines Open Space as:

All open space of public value, including not just land but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity (Annex 2)

- 3.4 The Site has never been available for public access and has not been utilised as private sports pitches for approximately 12 years. Furthermore, given the vegetative screening surrounding the Site, it provides only limited visual amenity to the local community.
- 3.5 **Medway Council's characterisation of open space in the Issues and Options Document (2016)**, outlines open space as being able to offer multiple benefits for health, tourism, wildlife and place making, bringing together a range of environmental, social and economic services. The derelict and vacant Site does not provide any of these listed benefits.
- 3.6 The Site does not meet the definition of Open Space and the future/subsequent Proposals Map should therefore be amended to exclude the Site from this earlier and out-of-date policy designation.

ii) Sustainable Development

- 3.7 Development on the Site would meet the definition of sustainable development as set out in the NPPF.
- 3.8 The Site is situated within the existing urban settlement and close to existing services and facilities, less than a mile to Strood High Street. Many primary schools are in close proximity to the Site, English Martyrs School, Hilltop Primary School, Temple Mill Primary School and Strood Academy Secondary School. As well as being located less than circa 4km from the University of Kent, University of Greenwich and Christchurch University shared campus.
- 3.9 The Site is also well served by public transportation, Strood Railway station is a 10-15 minute walk from the Site, and provides access to High Speed 1 to London St Pancras (35 minutes) and Faversham (33 minutes).
- 3.10 It is acknowledged that the Site is adjacent to the Frindsbury and Manor Farm Conservation Area, as well as the Grade II* Listed Church, these heritage assets would be considered in the development of proposals for the Site. In short, proposals would seek to enhance the setting of both the Conservation Area and Listed Church.
- 3.11 MC does not have a 5-year land supply in place, demonstrating the importance of the inclusion of smaller deliverable sites, such as out **Client's site**, in the emerging Local Plan to help **contribute to MC's land supply**.

iii) Strategic Land Availability Assessment (2015)

- 3.12 The Site was assessed in the SLAA (2015) (Ref: 0711). The assessment identified constraints and opportunities of the Site (see below).
- 3.13 There are discrepancies between the SLAA (2015) and the Local Plan Proposals Map (2003), for instance the SLAA considers that the site is not designated as Open Space, but is employment land and therefore should be protected for this use. The SLAA further suggests that development of the poses a risk to a Site of Specific Scientific Interest (SSSI), whilst the Proposals Map (2003) does not identify a SSSI near to the Site.

Table 2: SLAA 2015 (Medway Council)

Constraints	Opportunities
Poor access to services and facilities	Moderate access to public transport opportunities
Access to the strategic highway network could be constrained by congestion hotspots – Rochester Bridge and Medway Tunnel	Suitable vehicular access could be created on to Commissioners Road but would need further investigation
Potential risk to a SSSI	The site is located within the built up area, so it is unlikely to have a detrimental impact upon the locally valued landscape
Noise pollution may affect the Site, but it is likely this could be mitigated	Development is unlikely to impact upon any designated heritage assets
May be constrained by air pollution but mitigation is likely to be deliverable	Contamination is not suspected on the Site
	There are no residential properties adjacent to the site and amenity/overlooking impacts would be unlikely
	Is not designated open space
	Levels of flood risk on the site considered acceptable

- 3.14 The SLAA (2015) concluded that whilst the Site is subject to some 'development abnormalities' with regard to developability, there would be potential for the Site subject to further assessment.

iv) Overcoming Constraints

- 3.15 As above the SLAA (2015) identifies a number of constraints associated with the Site. Technical assessments will be carried out by consultants to mitigate the impacts of development on the Site. An initial response to each of the constraints identified is provided below.

a) Access

- 3.16 A review of current transport services, accident data, highways access, parking standards, trip generation and traffic impact will be assessed in line with proposals for the Site. At present it is considered that effective mitigation and potentially contributions from the development could

fund infrastructure upgrade to address the current network capacity constraints identified in the SLAA (2015) assessment.

- 3.17 The Site could be accessed from Commissioners Road, which runs adjacent to the boundary of the Site. The suitability of the current access would need to be investigated further, through the Development Management process.

b) Noise Pollution

- 3.18 The effects of road traffic noise is unlikely to be a major constraint, however, a noise assessment will be submitted as part of any planning application. This will consider the current baseline noise levels and noise from the existing industrial area (Medway City Estate).

c) Ecological Potential

- 3.19 An ecological review of the Site will be undertaken to identify the presence or absence of protected species/and or habitats on the Site. This will further inform development of the Site and recommend any necessary mitigation.

v) Proposed Development

- 3.20 Considering the identified constraints and opportunities of the Site, the Site is well suited for residential development.
- 3.21 Development of the Site will provide approximately 120 new homes (market and affordable) in close proximity to existing services and facilities. The Site is considered suitable, available and achievable and therefore deliverable (NPPF, para 47). It is able to come forward in the early **part of the Plan Period (first 5 years), helping to contribute to MC's 5-year housing land supply.**
- 3.22 The Site will incorporate the provision of Open Space, which will not only provide an area which can be accessed and utilised by the public, it will provide a visual amenity to the area and surroundings. This will enhance the setting of the Grade II* listed Church and protect the views of the chalk quarry edge.
- 3.23 Development of the Site would transform an area which currently is inaccessible, unattractive and derelict, to a space which enables better connectivity from Parsonage Lane and Church Green to Commissioners Road and allows for public use and access, providing better walkways and connectivity for the existing residential areas through the Site.

4.0 CONCLUSION

- 4.1 It is considered that the Land North of Commissioners Road is suitable for a highly sustainable residential development for the following reasons:
- MC does not have a 5-year land supply in place, demonstrating the importance of the inclusion of smaller deliverable sites;
 - The Site does not meet the definition of Open Space;
 - Development on the Site would meet the definition of sustainable development as set out in the NPPF;
 - The Site is well suited for residential development; and
 - Will provide a visual amenity to the area and surroundings and enhance the setting of the Grade II* listed Church, as well as, protect the views of the chalk quarry edge.
- 4.2 The Local Plan Proposals Map (2003) which identifies the Site as designated Open Space is increasingly out- of- date in planning policy terms. The Site does not meet the definition of Open Space, and the map should be amended to reflect this.
- 4.3 The Site is considered to be suitable, available and achievable and therefore deliverable within the next 5 years of the Local Plan period (NPPF, para 47). It is able to come forward in the **early part of the Plan Period (first 5 years), helping to contribute to MC's 5-year housing land supply.**

APPENDIX 1

SITE BOUNDARY PLAN



- 1. No dimensions to be scaled
- 2. All dimensions to be verified by the contractor before work is commenced
- 3. Architect to be notified immediately if any discrepancies are found
- 4. All shop drawings to be approved by Architect before work commences.
- 5. All details to be in accordance with relevant British Standards and manufacturers recommendations and specification
- 6. This drawing is the property of Barker And Coutts Architects, copyright reserved. This drawing is not to be copied, reproduced, retained or disclosed to any unauthorised person either wholly or in part without the specific consent in writing of Barker And Coutts Architects.

All Dimensions in mm

NOTE: BASE PLAN FROM DIGIMAPS.

THIS DRAWING TO BE REPLACED AS SOON AS CLIENT HAS PURCHASED ORDINANCE SURVEY AND LICENSE IN DUE COURSE.

NOT TO BE REPRODUCED

FOR REFERENCE ONLY

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Location Plan

1:1000 at A1

211 - Strood Quarry

Feb 2016

211/100/SK12

Name: Mark Bedding

Reference

92

Organisation

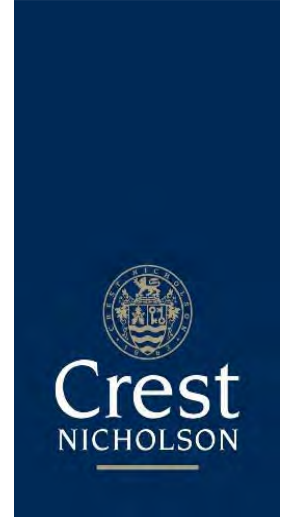
Crest Nicholson

On Behalf Of

Type of Consultee

Developer/Consultant

Tuesday, 13 December 2016



Dear Sir/Madam

Medway Council Local Plan Issues and Options - Land to the West of Cliffe Woods

Following our meeting with officers in 2015 to discuss the above site, we provide comments on the Issues and Options Local Plan currently published for consultation.

Question 80 – Are the development principles right? Should other guiding principles be introduced?

The Development Strategy is considered unsound as it fails to acknowledge housing growth at the District's villages.

It is important to consider allowing villages like Cliffe Woods to grow in order to meet local (settlement specific) housing needs and address affordability issues. It is also necessary to retain the working age population in the village to ensure the viability and vitality of local shops and services.

Typically, the baseline position for settlements to meet natural population growth over a 15-20 year Local Plan period equates to circa 10% of existing households. On the basis that the Parish of Cliffe and Cliffe Woods contains circa 2,100 homes, a requirement to accommodate a minimum of approximately 210 new homes represents a reasonable growth target over the Local Plan period.

Support should therefore be given to the development of the most suitable greenfield site/sites on the edge of the village with the capacity to meet local needs.

Land to the west of Cliffe Woods is sustainably located within walking distance to local shops and services. The site is well contained and would not result in coalescence with adjacent settlements.

As discussed with officers, the site offers the opportunity to accommodate circa 50 units on the smaller parcel to the south east of the site (SHLAA reference 1071) or circa 150 units across the entire site (SHLAA reference 1082).

We acknowledge that villages like Cliffe Woods have a rural setting so it is also imperative that homes can be delivered in the short term by a housebuilder with a proven track record of delivering low density, well-landscaped schemes. Crest Nicholson is National Housebuilder of

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the Year (two years running) and has a reputation for delivering family homes of the highest quality.

We look forward to receiving the next iteration of the Local Plan. In the meantime, should you have any queries, please do call.

Yours sincerely

Mark Bedding

Senior Planning Manager, Crest Nicholson Eastern

Name: David Bedford

Reference

93

Organisation

dha Planning

On Behalf Of

J.D Hinge and Trustees

Type of Consultee

Developer/Consultant

Medway Council Local Plan

Issues and options 2012 – 2035 Consultation Response

*Prepared on behalf of
J.D Hinge & Trustees*

February 2016

DHA/10058

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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 These representations are prepared and submitted on behalf of J.D. Hinge & Trustees in respect of Medway Council's current Local Plan Regulation 18 Consultation.
- 1.1.2 Medway Council is in the process of preparing a new Local Plan to set out a strategy for Medway's development up to 2035. Accordingly, the Council is asking for view on a 'Issues and Options' document as part of the early stages of the preparation of the plan.
- 1.1.3 The consultation document does not set out detailed policies or identify specific sites for development, but instead presents key contextual matters that will be the drivers for the new Local Plan. Accordingly, our comments focus on the strategic matters highlighted within the plan and respond to the relevant consultation questions included within the document.
- 1.1.4 Nevertheless, we also take this opportunity to reiterate why our client's land at Brompton Farm, Strood, represents a suitable and sustainable site that should be included as a residential allocation as the plan progresses.

2 Response to Relevant Consultation Questions

2.1 **Question 1 - What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035? (Page 14)**

2.1.1 Historically across both Kent and the wider South East of England housing prices and pressures have arisen because of the inadequate delivery of housing and a failure to provide the choice of homes that is needed. Furthermore, for too long the Green Belt and environmental constraints have been used as a reason to justify low targets and to limit the ability to provide the types and tenures of housing and development that is needed.

2.1.2 With the above context in mind, we consider that the Council needs to act and respond to the under provision of housing by now seeking to provide for the full objectively assessed need for market and affordable housing, as required by paragraph 47 of the National Planning Policy Framework (NPPF).

2.1.3 Meeting development needs and providing the homes, jobs and social infrastructure should be the overriding ambition of any new plan.

2.2 **Questions 2 and 3- What do you think are the strategic issues that the Local Plan needs to address and how should the council respond to these issues? (Page 17)**

2.2.1 As outlined above, the overriding ambition should be to provide the homes and jobs needed. The strategic issue is what are the most sustainable locations for growth and whether the Council can assist in meeting unmet need from neighbouring authorities.

2.3 **Question 4 - Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?**

2.3.1 The Government requires Local Planning Authorities to determine the full objectively assessed needs (FOAN) for housing in their strategic housing market areas.

2.3.2 We understand that the North Kent Strategic Housing and Economic Needs Assessment (SHENA) concludes that the Local Plan needs to make provision for up to 29,463 new homes by 2035 (1,281 dpa), and we welcome the acknowledgement that this figure has increased beyond the Council's earlier projections. Nonetheless, despite our best endeavours it has not been possible to locate the full report on the Council's website and therefore do not have the opportunity to robustly comment upon the methodology or finer detail of the evidence base.

2.4 **Question 5 - What do you consider to be the appropriate housing market area for Medway?**

2.4.1 We understand that the council analysing development needs through a joint SHENA with Gravesham Borough Council.

2.4.2 Again, it has not been possible to establish the housing market area used for the purpose of the SHMA study, but are of the view that this should include areas of surrounding

boroughs including Tonbridge and Malling, Gravesham and Maidstone and that endeavours should be made to meet any unmet need of these areas.

2.5 Question 6 - Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

2.5.1 We consider 25% to be an appropriate starting point for affordable housing negotiations, but that any future policy should be robust enough to respond to change in circumstances and to take account of the viability implications of the Community Infrastructure Levy (CIL).

2.5.2 We consider a reasonable threshold to be 15 units and over. Any threshold below this rate is likely to have detrimental implications in respect of viability and will threaten the ability to deliver the number of new homes that are needed.

2.6 Question 7 - What form of housing best meets the needs of Medway's growing population of older people?

2.6.1 We consider a suitable mix of housing is needed to reflect all the needs of the population, including for the elderly, young people, families and those with specialist needs. Our clients land at Brompton Farm has the characteristics to accommodate and provide for a range of development types and tenures, including specialist accommodation for the elderly.

2.7 Question 30 - What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

2.7.1 Paragraph 11.6 of the consultation document explains that the Metropolitan Green Belt has part of its eastern boundary in Medway, to the west of Strood and around the villages of Halling and Cuxton and that in addition to its function in preventing the outward sprawl of London, it provides openness in the narrow area between Medway and Gravesend, managing against the coalescence of the north Kent towns and larger villages.

2.7.2 We strenuously object to Green Belt being considered as an environmental designation. The Green Belt is a planning tool with the fundamental aim of preventing urban sprawl by keeping land permanently open. Whilst the essential characteristics of Green Belts are their openness and their permanence, it is not a landscape or environmental designation nor is any land included within Green Belt because of its environmental quality. Green Belt regulation should not therefore not feature within an environmental section of a plan and the plan should be more informative to the public in respect of the correct functions that Green Belts serve.

2.7.3 Furthermore, we acknowledge that Green Belt boundaries should only be altered in exceptional circumstances. However, the housing issues identified by the Council, along with the compelling unmet need, undoubtedly justify the release of the areas of the Green Belt that least contribution to its core objectives.

2.7.4 In the same regard, although paragraph 116 of the NPPF states that planning permission should be refused for major developments in AONBs, the same exceptional circumstances exists to justify some development in these areas.

-
- 2.7.5 In respect of wider biodiversity and protected wildlife sites, we agree that these should be preserved and protected in line with national planning guidance.

3 Promotion of Brompton Farm

3.1 Overview

- 3.1.1 Our client has promoted land at Brompton Farm (SLAA Site 0729) as a suitable location for residential growth during all previous opportunities within the plan making process and will continue to promote the need for wider Green Belt boundary review.



- 3.1.2 Based on the current national and local planning context, we consider Brompton Farm ('the site') to be a suitable area to roll back the Green Belt and to allocate land for housing to help meet the growing need for new homes, as it is one of the few remaining parcels of non-developed land within the border of the A289, which represents an ideal barrier to urban sprawl. We also consider the site has a role to play in accommodating the wider overspill of housing need from London and elsewhere within the South East of England.
- 3.1.3 Within the sections below we summarise the current national planning policy framework in which the emerging plan must be prepared, the implications of the identified 'full objectively assessed need' for housing and the wider constraints that make Brompton Farm well suited for sustainable expansion.
- 3.1.4 We also provide an assessment of the site's characteristics and why it is a suitable for release from the Green Belt, enclosing a concept masterplan of the type of development that could be delivered.

3.2 Planning Policy Context

The National Planning Policy Framework

- 3.2.1 The National Planning Policy Framework (NPPF) was published in March 2012 replacing previous guidance on planning.
- 3.2.2 The NPPF is clear that the primary purpose of the planning system is to contribute to the achievement of sustainable development, which includes providing the supply of housing required to meet the needs of present and future generations. Furthermore, sustainability is a holistic concept and therefore the economic, social and environmental impact of development must be balanced rather than viewed on an individual basis. Therefore, any potential impact of releasing Green Belt land can legitimately be outweighed as a consequence of the social and economic benefits of meeting the housing need.
- 3.2.3 In simple terms, there is a definitive 'pro-growth' starting point that was not apparent in earlier versions of Government planning guidance.

National Housing Policy

- 3.2.4 The NPPF places pressure on Local Authorities to 'boost significantly' the supply of housing by adhering to the requirements cited under Paragraph 47. In order to increase housing supply, Local Authorities are required to;

'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land; and

identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15'.

- 3.2.5 Paragraph 52 of the NPPF stresses the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. This approach is advocated at the site.

National Green Belt Policy

- 3.2.6 Section 9 of the NPPF seeks to protect Green Belt land. As with earlier iterations of Green Belt policy, paragraph 79 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and the essential characteristics of Green Belts are their openness and their permanence. Green Belt is not a landscape or environmental protection designation.

3.2.7 Paragraph 80 of the NPPF explains the five purposes of the Green Belt, which are as follows:

To check the unrestricted sprawl of large built-up areas;

To prevent neighbouring towns merging in to one another;

To assist in safeguarding the countryside from encroachment;

To preserve the setting and special character of historic towns; and

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.

3.2.8 Paragraph 83 of the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Summary and Implications of the NPPF

3.2.9 The introduction of the NPPF has significantly changed the context of the planning system, particularly in respect of the plan making process. Emphasis is now on local planning authorities to meet the full objectively assessed development needs of their housing market areas and, where possible, those of neighbouring areas (including the overspill unmet need from London).

3.2.10 Whilst it is acknowledged that Medway is constrained, previous housing targets have fallen well short of the level of need required in the area. Consequently, with the NPPF in force it is now necessary for the Council to identify and meet its full requirements.

3.2.11 With all of the above in mind, we consider the most sound approach to plan making within Medway would be to roll back the Green Belt to meet housing needs for this plan period and beyond.

3.3 Overview of Allocation Sought

3.3.1 Detailed proposals have not been advanced and any future scheme would be subject to early and meaningful engagement with the local community Medway Council. Nonetheless, in order to assist with the Local Plan preparation a concept masterplan has been provided in order help emphasise how the site could be developed and how the opportunities and constraints could be factored into any wider scheme. The concept masterplan and supporting information is presented at **Appendix 1**.

3.3.2 The design ethos is to provide a residential-led urban extension, whilst creating a development that maintains a natural transition between town and countryside. Homes will bound the rear gardens of existing properties on Brompton Farm Road and bound by A226 Gravesend Road to the west and Stonehouse Lane to the east. A green hub formed of community open space would be provided in the areas north the site that are most constrained. Likewise, a landscape, ecology and open space led scheme would be proposed in order to positively respond to the wider site constraints.

- 3.3.3 The land in our client's control amounts to some 44.6 ha. However, the concept masterplan sees the site subdivided into three separate development parcels and to retain a significant amount of open space. With this in mind, it is initially envisaged that the site could accommodate in the region of 800 to 1,000 new homes (at densities between 35 and 40 dph) based on a developable area of approximately 23ha.

3.4 Planning Appraisal

Green Belt

- 3.4.1 As set out at paragraph 80 of the NPPF, Green Belt serves five purposes and therefore we address the submission site in the context of each of these objectives below.

To check the unrestricted sprawl of large built-up areas

- 3.4.2 Urban sprawl can be defined as the advancement of sporadic and unplanned development beyond the clear physical boundary of a developed settlement.
- 3.4.3 Whilst this is a legitimate planning matter, there is no basis to assume that a well-planned strategy for Green Belt boundary review here would weaken or lead to any future risk of unplanned encroachment into the countryside. To the contrary, the submission site is located adjacent to the existing settlement boundary, so development would not result in sporadic or isolated housing. Instead, it would create a logical and well planned extension to the existing built development and would follow a similar pattern of development that has taken place elsewhere within the authority area. For example, Liberty Park to the north east.
- 3.4.4 Furthermore, this area of Strood is semi-rural in nature and does not represent a 'large built up area' that needs to be contained in the same way as other urban and London Boroughs that are far more urban in character. Release of the site would also represent a consistent approach to that adopted for sites such as Liberty Park a short distance away.

To prevent neighbouring towns merging in to one another

- 3.4.5 The submission site is located to the north of Strood and west of Wainscott. The closest settlement beyond this is Higham to the north west (1.6km) or Cliffe Woods to the north (2km).
- 3.4.6 If the Green Belt boundary was to be amended to allow development of the submission site there would remain at least 1.25km separation between the closest settlements. Furthermore, both are physically divided by the A289 Bypass.
- 3.4.7 For this reason, there is no basis to assume that there would be any demonstrable erosion of the space between settlements, nor would the development of the site increase the risk of any two settlements merging.

To assist in safeguarding the countryside from encroachment

- 3.4.8 Encroachment can be defined as the presence of development within the Green Belt not connected or adjacent to a built up area. As the site borders the currently defined

settlement confines, development on this site would form a natural and logical extension rather than represent encroachment into the countryside. More importantly, it would protect genuine areas of open land from risk of development.

- 3.4.9 Therefore this purpose is not applicable to the site.

To preserve the setting and special character of historic towns

- 3.4.10 Medway as a whole has historically expanded in erratic patterns. However, there is no significant history or special character in respect of this particular area. Furthermore, it does not lie within a Conservation Area.

To assist in urban regeneration, by encouraging the recycling of derelict land

- 3.4.11 Given the lack of brownfield opportunities Green Belt land is needed and therefore this purpose is superseded by the requirement.

- 3.4.12 Taking all of the above into consideration, the site currently plays a limited role in fulfilling the core functions of the Green Belt.

3.5 Generic Planning Issues

Sustainability

- 3.5.1 There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

'an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy'.

- 3.5.2 Development on this site would contribute to the achievement of sustainable development due to a series of economic, social and environmental benefits.

- 3.5.3 Provision of housing would help ensure that sufficient land of the right type is available in a sustainable location within the early phases of the emerging plan period. It would provide new homes in a location where people wish to live, namely in a semi-rural location with excellent access to both town, countryside and essential day to day services.

-
- 3.5.4 The delivery of housing would also provide an economic benefit during and after build out. Construction jobs would be maintained or created, and household expenditure generated by future residents would support economic activity locally. Housing development would also enable the Council and local community to benefit from revenue linked to Section 106, CIL contributions and a New Homes Bonus.
- 3.5.5 From a social perspective, a suitably designed mix of both open market and affordable residential units would provide housing in a sustainable location that has been in short supply in recent years and that will therefore help see the needs of present and future generations being met.
- 3.5.6 Finally, we consider that in selecting sites for development the wider environmental quality of the authority area must be taken into account. From a visual perspective the concept masterplan presented with this submission is clear that a residential and open space led approach is advocated in order to provide an appropriate form of development and a transition between town and countryside. Likewise, opportunity exists to build upon existing ecological potential and to enhance the habitat for protected and non-protected species alike.
- 3.5.7 Having regard to paragraph 7 of the NPPF and core sustainability objectives, we consider the site is sustainable.

Access

- 3.5.8 In terms of vehicular access, the submission site benefits from different opportunities via the Gravesend Road, Brompton Farm Road and Stonebridge Lane. Sufficient land exists to ensure that a safe and efficient access meeting current highway design standards could be provided to serve an urban extension.
- 3.5.9 It is situated within close proximity to Strood (1.6miles) and Higham mainline railway station (2.6 miles) and benefits from excellent access to the strategic road network via the A2.

3.6 Deliverability

- 3.6.1 The NPPF states that for sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

Availability

- 3.6.2 Availability is essentially about confirming that it is financially viable to develop and viability remains a central consideration throughout plan making and this is set out in the NPPF (Para 159).
- 3.6.3 We can confirm that, subject to reasonable S106 contributions being sought, there are no financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the plan period.

Suitability

- 3.6.4 For reasons set out in this statement the site is considered suitable for development. In summary, the site borders the currently defined town confines and would form a natural and logical extension and would provide a sustainable urban extension.
- 3.6.5 Residential development on this site would make a useful contribution to the housing land supply for both market and local needs affordable housing, which is tantamount to the exceptional circumstances needed to justify the altering of Green Belt boundaries.
- 3.6.6 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

Achievability

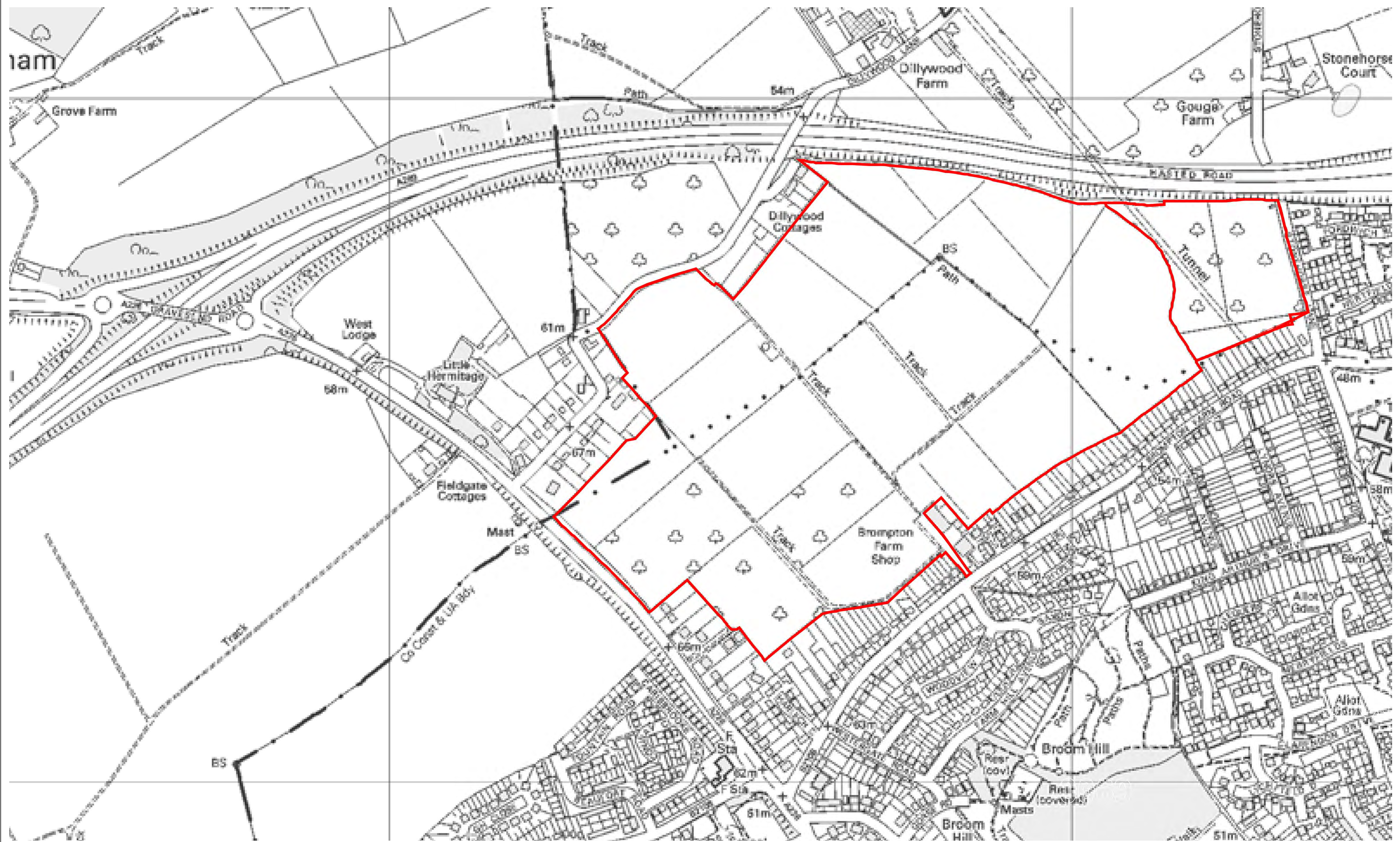
- 3.6.7 The site is in two separate ownerships. However, there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

3.7 Summary and Conclusion

- 3.7.1 Taking all of the above matters into consideration we consider that there are no planning reasons why new housing should not be provided on land at Brompton Farm. Furthermore, there are compelling planning reasons that represent the 'exceptional' circumstances needed to roll back the Green Belt; namely the limited contribution of the site to Green Belt purposes and the high need to meet unmet housing need.

1

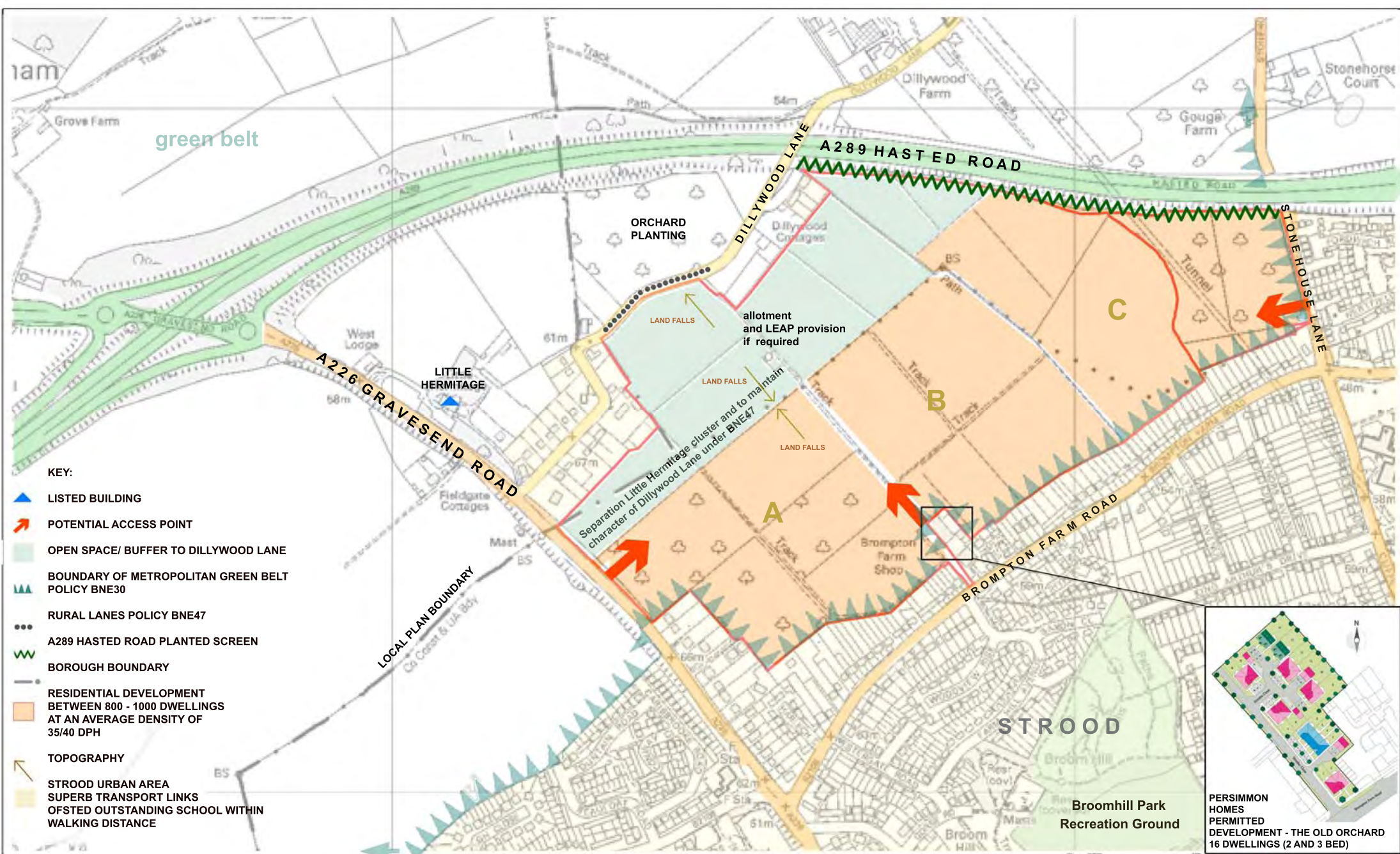
APPENDIX



notes

rev	reason	date
client	J.D HINGE TRUSTEES	
project	BROMPTON FARM	Eclipse House, Eclipse Park, Sittingbourne Road Maidstone, Kent, ME14 3EN t: 01622 776226 e: info@dhaplanning.co.uk f: 01622 776227 w: www.dhaplanning.co.uk
title	ILLUSTRATIVE CONCEPT PLAN	No reproduction by any method of any part of this document is permitted without the consent of the copyright holders. Produced for Town and Country planning purposes only. O.S Licence Number: AL54535X
dwg	rev	scale
DHA/10058/03		1:2500
	date	DEC 2015
	CAD Reference:	A1





Land at Brompton Farm, Strood

Illustrative Concept Plan

Site Area - 44.6 ha

client	J.D HINGE TRUSTEES			
project	BROMPTON FARM		Edgware House, Edgware Park, Sittingbourne Road Maidstone, Kent ME14 3EN t 01622 776221 e info@shapenriving.co.uk w www.shapenriving.co.uk	
title	ILLUSTRATIVE CONCEPT PLAN		No reproduction by any method of any part of this document is permitted without the consent of the copyright holders. Produced for Town and Country planning purposes only. O.S. Licence Number: AL34535X	
sheet	no	scale	date	CAD Reference:
DHA/10056/03	1:2500	DEC 2015		
				A1

Land at Brompton Farm, Strood - Wider Context



existing



proposed

Name: Andrew Street

Reference

94

Organisation

On Behalf Of

Type of Consultee

Member of the public

28 February 2016

Planning Policy
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

Dear Sir/ Madam

**MEDWAY COUNCIL LOCAL PLAN
ISSUES AND OPTIONS CONSULTATION 2012 – 2035
RESPONSE TO PUBLIC CONSULTATION**

These representations have been prepared on behalf of the landowners and sets out our comments in response to Medway Council's Local Plan Issues and Options Consultation. There is interest in this site from a nationwide housebuilder in this site referred to as Land at Mierscourt Road, Rainham.

The Site was originally put forward for consideration to Medway Council's 'Call for Sites' Strategic Land Availability Assessment (SLAA) in May 2014.

Whilst we support Medway Council's intention to undertake a form of public consultation on a new Local Plan for the area the document is broadbrush in the nature of option and Issues raised. We would welcome the opportunity to comment further at a later stage on the draft local plan.

Based on the information available, we consider that there is further work to be done in order to ensure Council is working towards a "sound" Local Plan. Notably, the current identified housing figure needs to be revisited to identify full OAN, as required by National policy. We understand that a revised SHMA has been prepared and released for public consultation.

It is also vital that the evidence base, which should inform and underpin the Local Plan, is made available prior to any next stage of formal consultation on the Local Plan. Without these, MC will be unable to make an informed decision on future growth strategies for the area, nor will the public be able to make informed comments which in turn would assist MC.

The Site itself comprises a single land parcel to the east of Mierscourt Road and is approximately 35 hectares in size. It is private open land mainly in equestrian use. The Site also comprises former agricultural buildings associated with the current use and Orchard Cottage, which is currently in use as a kennels.

Immediately to the west of the site lies the urban settlement boundary of Rainham, residential properties on Mierscourt Road and also Mierscourt

Primary School. To the north of the site lies agricultural land which is also known to have been promoted through the SLAA process for residential development, including land to the east of Mierscourt Road and south of Oastview, which is currently with Council for determination for 136 dwellings under application reference MC/15/4539 (Redrow Homes).

To the north of the Site is the settlement boundary of Rainham again and Rainham High Street (A2). To the east of the site is Meresborough Road, a single track lane. Beyond Meresborough Road to the east lies further agricultural land.

The site is promoted for residential development comprising a mix of dwelling types and sizes including an element of affordable dwellings. It is anticipated that a total of approximately 900 dwellings could be delivered on the site subject to further testing in addition to car parking provision, open space and potentially a range of services and facilities. Access points to the site can be obtained from Mierscourt Road with potential additional access onto Meresborough Road subject to further analysis. The Site is in a sustainable location within close proximity to the Medway urban area.

As set out within this letter, the Council should seek opportunities for sustainable development in accordance with Government policy, such as at 'Land at Mierscourt Road' in recognition of the significant contribution such sites can make in meeting the housing and development needs within the Council's area.

We would be grateful if these comments can be taken into consideration.

Yours faithfully

Anure Street

Enc

Name: Judith Ashton

Reference

95

Organisation

Judith Ashton Associates

On Behalf Of

Redrow Homes

Type of Consultee

Developer/Consultant



Monday 29th February 2016
613/A3/JJA

Planning Policy Regeneration
Community & Culture
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

Dear Sirs

Re: Medway Council Local Plan – Issues and Options Consultation Document – Jan / Feb 2016
Representations on behalf of Redrow Homes Limited

I write with reference to the above. I act for Redrow Homes Limited who have various interests in Medway, including those at Walnut Tree Farm, High Halstow.

We note that the Medway Council Local Plan – Issues and Options Consultation Document is predicated upon an Objectively Assessed Housing Need of 29,463 between 2012 and 2035 (1281dpa).

Whilst we also note that chapter 6 of the Medway Council Local Plan – Issues and Options Consultation Document acknowledges the influence London has over the area's economy and its housing market, it is unclear whether the Objectively Assessed Housing Need has taken into account the effects of the London market and whether the housing target has had regard to the requirements of the Duty to Cooperate and thus is providing for any adjacent authority/looking to others to assist Medway in meeting its needs. Both are strategic issues that the Local Plan needs to address in determining the ultimate housing requirement and the scale and direction of growth (question 2). Similarly both are issue that lead us to question the approach and conclusions of the North Kent Strategic Housing and Economic Needs Assessment (SHENA) (question 4).

In the context of the above and given the contents of chapter 4 of the Medway Council Local Plan – Issues and Options Consultation Document, we consider further thought needs to be given to the merits of the starter homes initiative and how this integrates with the affordable housing requirement given the significant affordable needs of the area.

Turning to the local economy, in noting the employment growth forecasts in the SHENA and associated employment land requirements, we would question how this is linked to the housing target and how Medway Council intend to try and reduce the level of out-commuting. Housing growth needs to be linked to employment growth if out-commuting is to be reduced – question 20 refers.

The environmental constraints identified in chapter 11 of the Medway Council Local Plan – Issues and Options Consultation Document should in our opinion be clearly mapped and set out in the next iteration of the plan so the areas that are constrained by environmental designations are clearly understood and development restricted in such areas in accordance with the footnote to para 14 of the NPPF.

In addition consideration needs to be had to the way in which development in areas that are close to environmentally sensitive locations can actively enhance then / control access to them/ contribute towards an effective green infrastructure network. Sensitively planned, small scale urban extensions are often well placed to be able to address these points and further discussions should be had with the development industry about this and the adoption of an environmental and landscape hierarchy so that the most sensitive areas are protected and consideration can be given to whether the least sensitive can accommodate small scale growth in a planned and environmentally sensitive way.

The issue of access to public transport and the decline in rural services is recognised as a real problem in parts of Medway and we believe that consideration should actually be given to the way in which strategic scale development in areas like the Hoo Peninsula could help address this issue. A ribbon of small scale urban extensions/ extensions to existing villages in the Peninsular could in our opinion actively help retain existing services and facilities like schools and shops, and provide for a more integrated transport network to evolve in the area. Whilst Hoo St Werburgh may act as a service centre, other villages – such as High Halstow have the ability to accommodate small scale growth that could help contribute towards addressing this issue (questions 38 – 42 refer). Furthermore the preparation of a CiL charging regime with clearly defined projects will in our opinion help ensure development within the Peninsular can prioritise the delivery of what are defined as the key services required in the area, as well as a more integrated public transport service that can support growth in a sustainable manner (questions 71, 72 and 77 and 78 refer).

In the context of the above, whilst we believe that the council should look to direct growth within the rural areas to sites that fall within agricultural land grade 3, there is in our opinion some inevitability that grades 1 and 2 land will have to be used to accommodate development if the scale of growth envisaged in the plan is to be delivered. The test then is whether the loss of the land significantly affects the farming enterprise, or whether the site in question is of such a small scale/ the field is in a location / is of a nature that its loss will not affect the overall farming enterprise. Perhaps this is a question that should be raised on future calls for sites/ SHLAA assessments.

Turning to the Development Strategy, we note the comments made at para 27.7 which states: *'To secure the sustainability of the rural settlements on the [Hoo] peninsula, meeting local needs for services is important. The options for further development across the wider Peninsula must be assessed as part of the local plan process'*.

We also note that para 27.23 suggests that 'significant planned growth of existing settlements' such as Hoo could enable the provision of facilities that are of benefit to the whole of the Isle of Grain. In our opinion, and in answer to questions 81 and 82, we consider that rather than concentrate development in one settlement in the Hoo Peninsular the Council should look to a ribbon of smaller scale growth within the existing villages in the Peninsular to complement a larger scale expansion to Hoo/ Hoo St Werburgh. Villages such as High Halstow are in our opinion capable of accommodating small scale growth that would complement that in the likes of Hoo and help maintain local services and facilities/ bolster public transport links between the villages to the benefit of all in the Peninsular. As para 27.19 acknowledges *'well planned low-density estates could enable the most sensitive countryside features such as hedgerows, field patterns and important trees to be preserved, and could even enhance access to these areas. Such estates can be attractive in themselves, with good design, and could provide the larger family houses that Medway needs.'*

If Medway Council look to progress a CiL charging schedule with a clear set of identified needs against which CiL payments can be made, a development strategy that integrates the planned expansion of Hoo, a network of small scale urban extensions to the main villages on the Peninsular and a reduced scale of development at Lodge Hill (if permitted), this could, in

combination with some incremental suburban development in the less sensitive areas to the south and east (such as Strood and Rainham), and some town centre and riverside development, accommodate the Objectively Assessed Housing Needs of the area.

History has demonstrated that promoting a single option is unlikely to meet the council's needs. A more realistic, planned approach as suggested above, complemented by a clear infrastructure delivery plan to be paid for through CiL and other funding streams will we believe help the council address some of the infrastructure issues in the area and help residents see the benefits new development brings with it.

In the context of the above, and in answer to question 83, we do not believe redevelopment of the existing employment areas will help address the housing requirements of the HMA. Whilst some mixed use development may be suitable in these areas the fact is redeveloping them for residential purposes will only push the councils ability to accommodate its employment needs to other potentially less sustainable areas, and one way or another greenfield land will be required to meet the Councils overall housing requirement.

Likewise we do not believe increasing the density of development to be accommodated is the answer to bolstering housing supply. This will just promote smaller residential units i.e. 1 and 2 bed house/ flats, not the larger family housing the plan says is needed in the area.

Overall we believe that development on the Hoo Peninsular, including development on the land at Walnut Tree Farm in High Halstow will help accommodate the Objectively Assessed Housing Needs of the area; that said development can come forward as part of a comprehensive suite of sites to supplement an extended Hoo St Werburgh, and if approved Lodge Hill; and that this would, through a CiL charging schedule with a clear set of identified needs against which CiL payments can be made, help address the service and infrastructure requirements of the Hoo Peninsula, including the public transport requirements of the area; and provide for much need for family sized housing, affordable housing and starter homes without any adverse environmental or landscape impacts.

To this end we would welcome the opportunity to meet with officers to discuss our views in more detail and our proposals for the land at Walnut Tree Farm if this would be of assistance.

Yours sincerely



JUDITH ASHTON
Judith Ashton Associates

C.c. David Banfield Redrow Homes Limited

Name: Liz Shier

Reference

96

Organisation

Kent County Council

On Behalf Of

Type of Consultee

Government/Public Body



Ms Catherine Smith
Planning Policy Regeneration
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

**Environment Planning and
Enforcement**
Invicta House
County Hall
Maidstone
ME14 1XX

29th February 2016

Dear Ms Smith,

Re: Medway Local Plan Issues and Options Consultation

The County Council welcomes the opportunity to comment on the Issues and Options consultation and to highlight some of the cross boundary issues that we believe should be considered in preparation of the Medway Local Plan, particularly in relation to transport and community infrastructure deliverability. KCC has provided a response to the consultation questions in Appendix A.

A summary of the key points are as follows:

- KCC have concerns over the impact that the additional houses might have on Kent services and infrastructure. Medway need to ensure that future development sites are viable and that the level of infrastructure required to support the level of growth anticipated can be funded and delivered to help create sustainable communities particularly in relation to transport and education.
- Medway should take advantage of its position in the Thames Gateway. Provision of good quality, easily accessible employment floorspace could help to capitalise on growth in the wider area. Medway needs to be promoted as an attractive cheaper alternative to London for employers, with its good transport links and more reasonable business rates.
- Greater consideration will need to be given to the proposed Lower Thames Crossing Option C proposal. The impact of the proposed route of the new Crossing on Medway roads should not be underestimated.

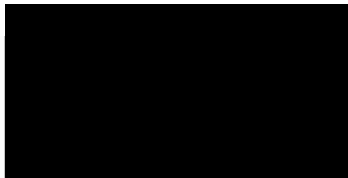


This is available in
larger print on request

- KCC are in general agreement with the proposed development strategy. KCC support development within the current urban areas rather than substantial development on the edge of the towns on greenfield sites and in the greenbelt.
- KCC support the proposal to explore the potential for residential development in Chatham town centre and the waterfront area. Concentrating mixed use high density development in these areas is a sustainable option and would take the pressure off greenfield sites in the countryside.
- KCC would welcome continued dialogue with Medway Council to consider the cumulative impact, of development sites in Medway and those within Kent to fully understand the impact on key services.

If you have any queries regarding our comments, please contact me.

Yours sincerely



Katie Stewart
Director Environment, Planning and
Enforcement Kent County Council

Appendix A: The County Councils response to the Medway Issues and Options Consultation Questions

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

KCC are broadly supportive of the ambition set out in the Issues and Options consultation document. One of the key issues will be to ensure that future development sites are viable and that the level of infrastructure required for 29,264 new homes can be provided particularly for transport and education.

Medway should also take advantage of its position in the Thames Gateway. Provision of good quality, easily accessible employment floorspace could help to capitalise on growth in the wider area. Medway needs to be promoted as an attractive cheaper alternative to London for employers, with its good transport links and more reasonable business rates.

The impact of the proposed Lower Thames Crossing Option C proposal will need to be considered and the impact of the proposed route of the new Crossing on Medway roads should not be underestimated.

KCC are in general agreement with the proposed development strategy. KCC support development within the current urban areas rather than substantial development on the edge of the towns on greenfield sites and in the greenbelt.

The Local Plan will need to recognise the role that Medway's historic environment has played in forming the character of the area as well as its potential as a contributor to the success of the area in the future..

2) What do you think are the strategic issues that the Local Plan needs to address?

The Issues and Options document covers the main strategic issues in Kent that also affect Medway, it refers to the Lower Thames Crossing (LTC), Medway's place in the Thames Gateway, the development of Ebbsfleet Garden City, and the work of the South East Local Enterprise Partnership.

KCC welcomes the commitment to work with neighbouring planning authorities and statutory bodies in cross boundary matters to address these strategic issues.

Among the key strategic issues is the need to regenerate and develop Medway in a way that is sympathetic to its past. The river frontage contains numerous heritage assets and has great potential for heritage-led leisure and tourism. The Local Plan should seek to ensure that the heritage assets of all of Medway are used to their maximum advantage so that regeneration can be successful and durable.

3) How should the council respond to these issues?

The Issues and Options document needs to give greater consideration to the proposed Lower Thames Crossing Option C proposal.

It should not be underestimated the pressure a new LTC east of Gravesend will place on some particularly congested corridors such as the A2, A289 and the A226 (Gravesend Road). It is expected that Medway will be properly engaged in the LTC

process, particularly as Option C is likely to see a change in existing traffic patterns across the wider Medway area, notably east-west movements.

Medway are committed to working with neighbouring planning authorities and statutory bodies in cross boundary matters, KCC welcome this as a means to addressing the strategic issues. KCC's forthcoming fourth Local Transport Plan (LTP4) will also determine to work with partner organisation on such matters and so both authorities align with one another.

The Plan needs to emphasise the importance of conserving and, where possible, enhancing the historic environment such that it can contribute to the future growth, economy and social wellbeing of Medway. The Plan should recognise the full range of heritage assets in the area: listed and historic buildings, archaeological sites and monuments, and historic landscapes.

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

KCC attended a session on the North Kent Strategic Housing and Economic Needs Assessment and consider the methodology to be appropriate and the conclusions reasonable.

5) What do you consider to be the appropriate housing market area for Medway?

The housing market area needs to extend past the Medway boundary and include neighbouring authorities particularly with the improved HS1 services which attracts commuters to the Medway Towns.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

Viability is a key concern for KCC and the appropriateness of the figure would depend on whether the initial analysis indicates that this percentage would be deliverable on developments of over 15 units. KCC would encourage further work to consider whether smaller developments would be able to support the delivery of affordable housing.

7) What form of housing best meets the needs of Medway's growing population of older people?

A combination of nursing homes, warden controlled homes and houses that can be adapted to incorporate specific requirements i.e. wheel chair access etc. are needed.

8) What housing is needed for other specific groups in Medway?

The Medway Towns has a large student population; their accommodation needs should be considered.

KCC would encourage a review of the gypsy and traveller accommodation needs following the changes in government policy.

9) How can development make a positive contribution to the health and wellbeing of Medway's communities?

Good design can help to make a positive contribution to the health and wellbeing of communities. Well-built, attractive homes with plenty of public open space and good access to key services can improve the wellbeing of Medway's communities.

10) Do you have suggestions for potential sites for starter home developments?

11) How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?

12) How should the council provide for the demand for land for self and custom build housing? For example, integrated with larger developments, on standalone sites, or linked to placemaking ambitions to deliver highly sustainable and innovative design quality.

Starter homes could be incorporated into a number of the key strategic sites particularly those close to public transport as those residents on lower incomes are likely to rely on public transport.

Housing developments are often stalled due to viability. An increase in starter homes will have an impact on the viability as they are exempt from S106/ CIL and this could have a major impact on the ability to fund critical infrastructure to support communities.

13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?

Student housing should be located close to the universities and colleges or close to public transport to provide good access to the facilities.

14) What is the level and type of need for gypsy, traveller and travelling showpeople's accommodation in Medway, and what criteria should be used to identify appropriate sites?

This will need to be determined through the proposed review of Gypsy and Traveller accommodation needs. KCC would be happy to be involved in this review.

15) Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?

A range of employment areas and suitable business accommodation should be provided this will help to improve the local economy and reduce travel and out-commuting. These should be located where there is good transport infrastructure particularly in and close to the town centres and at existing employment areas.

16) What are the opportunities for further business growth in and close to town centres in Medway?

KCC consider that the opportunity areas have been identified on Page 30 of the consultation document.

17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?

KCC attended a session on the North Kent Strategic Housing and Economic Needs Assessment and consider the methodology to be appropriate and the conclusions reasonable in relation to jobs and employment.

18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?

Medway should capitalise on its position in the Thames Gateway. Provision of good quality, easily accessible employment floorspace could help to capitalise on growth in the wider area. Medway needs to be promoted as an attractive cheaper alternative to London for employers, with its good transport links to the wider area and its more reasonable business rates.

19) How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?

The Plan should encourage greater links between the universities, colleges and local businesses to share experience and knowledge. This can increase productivity of existing business and potentially attract inward investors.

20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?

A shortage of good quality office space has been identified as a potential problem in the consultation document and addressing this is necessary in reversing the trend of out commuting, as well as through encouraging new tech and creative activities in to the area.

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

Many of the wharves and docks along the Thames and Medway although are of historic importance are, however, often neglected and difficult to access. An assessment of business need is required to understand the locational requirements.

22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?

Opportunities for further visitor accommodation should be sought particularly in Rochester.

KCC welcome the recognition in the Plan that the Paramount proposal could offer new opportunities for tourism.

23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?

Groups of attractions/activities should be promoted to encourage extended visits; this could be combined with neighbouring areas. Overnight accommodation could be improved and encourage use of historic or unusual buildings.

24) What role does the river and Medway's countryside have to play in developing tourism locally?

There are a range of local attractions in Medway, primarily focused on the river, that would benefit from improved conservation and presentation and that would in turn contribute significantly to the regions wellbeing, sense of place, and economic potential.

Medway has long been an area of military significance for the UK. Much of this importance is derived from the presence of the historic dockyard and the Issues and Options Report suggests that this is appreciated. However, the potential of the defence systems that surround the dockyard are not fully appreciated. In particular, the fortifications of Grain constitute one of the most powerful and varied sets of defence sites in the country. These could play a much greater role in Medway's tourism industry which could be particularly important given the range of challenges faced by that part of Medway. There are additional defence sites along the Medway that could be incorporated into river-based tourism, even if some, such as forts Hoo and Darnet could not be visited. Within the Hoo peninsula the remnants of the Second World War GHQ Stop Line forms one of the most complete military landscapes of the Second World War in Kent and in conjunction with the nearby military remains at Chattenden could again play an important economic and social role in this growth area. Further to the west, Cliffe Fort and Slough Fort also have an undeveloped tourism potential.

Medway's countryside can also play a greater role in tourism. For this to happen though it needs to be first understood and then conserved. The comments made in relation to Historic Landscape Characterisation in response to question 32 apply here.

25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

Investment and retail should be focused towards Chatham to increase the vitality of the centre which has been in decline in recent years and to try and reduce the vacancy rate.

Gillingham should also be a further focus of investment as the shopping environment has been in decline in recent years.

26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

Meeting currently identified capacity should be a starting point, with the medium term plan to explore the potential for increased market share.

KCC supports the proposal to explore the potential for residential development on some of the vacant sites within Chatham and Strood Town Centres.

27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?

There should be a good mix of uses in the town centres although it is not for the place of KCC to say what that mix should be for each particular town.

28) Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go?

Although the provision for convenience retail in the town centre is poor, there is a new Asda close by and a large Tesco's on the A2 so it is suggested there is sufficient retail provision nearby.

29) What should our approach be to proposals for new or enhanced out of town retail?

It is suggested that provision should not be made for new out of town retail but encourage enhanced provision at existing ones.

30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

All new development should consider the surrounding environment and consider ways to mitigate any potential harm that maybe caused and look for ways to enhance and improve access to it.

31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

The Green Infrastructure (GI) for any proposed development needs to consider adjacent sites/areas to ensure that all GI is connected within Medway and neighbouring Local Authorities.

There is a need for a strategic approach to GI to ensure it doesn't develop in a piecemeal way with individual developments. Any GI strategy produced will need to have consideration of other GI strategies produced.

32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

The presentation of Medway's environment in the current text focuses on the biodiversity and semi-natural aspects of the landscape. It does not at present seem to recognise that the whole landscape of Medway is the result of the interaction of natural and human processes over many centuries. Even areas of landscape such as the 'undeveloped' areas identified in the text (11.4) contain many historic features such as the patterns of tracks, lanes and hedgerows that give character to the district, and the marshland has been created by reclamation from the medieval period onwards.

The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent. Where it is to be applied locally further study is needed to refine its conclusions but it remains an essential tool for understanding Medway's landscape. To be fully effective in local planning and development control, the Historic Landscape Characterisation should be backed up by more detailed case-by-case analysis, to add greater detail through secondary sources. Some parts of Kent have now been covered by such as assessment (including the Hoo Peninsula) and it is suggested that Medway Council works with KCC to take forward a Medway study.

Also the extended urban surveys only dealt with the early part of the post-med period and would benefit from a further study building on the VCH work and looking at the post-medieval and modern periods. Such a study would be of great benefit to

addressing Q32 in particular as it could identify historic connections between places in Medway that could serve as a basis for enhancing connectivity.

The National Heritage List for England lists 634 listed buildings in Medway, not 900 as stated in Paragraph 12.4. Section 12 lists Medway's heritage assets but only includes historic Rochester and Medway's military heritage. Medway also contains a wealth of other known archaeological sites and many others as yet unknown. There are also large numbers of historic buildings that may not be listed but are still important elements of the communities in which they lie. Each of these contributes to the heritage and character of the area.

33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

Medway's heritage has great potential to contribute more effectively to the quality of life in the area than it does at present. The heritage is complex, however, and needs careful consideration to ensure that the opportunities it presents are not missed and that it is not harmed by inappropriate or poorly planned development.

Medway has a wide range of heritage assets, many of which are of international importance. These include 76 scheduled monuments, more than 630 Listed Buildings, and 2 Registered Parks and Gardens. There are many more heritage assets that contribute to character at a local level. These include more than 30 historic parks and gardens, historic landscape features, historic buildings and archaeological sites. Indeed, the Kent Historic Environment Record lists more than 3,300 un-designated heritage assets in Medway

These assets are to be found across the unitary authority. Highlights include Rochester with its important Roman, Saxon and Medieval remains, Chatham, with its internationally important Royal Dockyard and defending ring of forts, Gillingham which has Saxon origins and the fortifications of Grain. Within the rural areas of Medway the historic environment is similarly important: important Palaeolithic remains are present at Cuxton and elsewhere along the former courses of the River Medway and the marshes and intertidal zone are important for later prehistoric remains. The rural areas are particularly important for its military and industrial survivals as well as its pattern of historic villages and lanes. Many of these sites are of national significance but currently undesignated (e.g. Cliffe explosives works). For new growth and development to be successful in the area it will have to work with the grain of this existing character and, if possible, enhance it.

In recent years, Kent County Council has developed a Heritage Strategy for Dover District Council, and is currently developing another for Shepway District Council. The goals of these strategies are:

- To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them*
- To assess the role that these can play in in regeneration and tourism*
- To identify both their vulnerabilities and the opportunities they provide*
- To inform site allocations within the district*
- To support policy development*

It is recommended that Medway Council develop a similar strategy which would also be compliant with para 126 of the NPPF which requires local authorities to have a

“positive strategy for the conservation and enjoyment of the historic environment.” I would be happy to discuss the matter further.

If the Authority decides not to pursue a Heritage Strategy then it is essential that the Local Plan underpins the conservation and enjoyment of the historic environment in all relevant sections. The sections will need to describe the contribution that the historic environment can make as well as the issues that need to be considered to ensure appropriate conservation of heritage assets.

These should include:

- Building design (e.g. the need for new build to respect local character in terms of form, size, materials, massing and orientation)*
- Settlement hierarchy and design (e.g. the benefits of new development respecting the layout of boundaries, roads and lanes so that they fit into the grain of existing settlement)*
- Landscape and green infrastructure (e.g. using aspects of the historic landscape to promote connectivity and ensure that historic character is enhanced)*
- Natural environment and coasts (e.g. recognising the wealth of heritage assets along the coast of Medway and that these can take the form of settlement, maritime or military sites)*
- Tourism and economy (e.g. identifying those heritage assets that can play a greater economic role in the area by promoting them as tourist sites or re-using historic buildings for new purposes).*
- Sustainability and climate change (e.g. bringing together recent research by Historic England on the energy savings often inherent in existing buildings compared with the cost of demolition and new build but also the need for historic buildings to be treated sympathetically when energy improvements are being made)*
- Flood risk (e.g. the need for SUDS permissions to take account of the impact they can have on historic structures and archaeological sites. Guidance on this is available from KCC Heritage Conservation)*

Another important management tool for the historic environment would be Local List of Heritage assets (not just buildings). The assets likely to be included on a local list will be those of particular importance to local communities as opposed to those on the statutory list which meet national criteria. A local list thus allows a particularly responsive and community-led approach to the conservation of the historic environment.

A recent project carried out by Medway Council, Kent County Council and the Kent Gardens Trust is a good example of this. The project involved a community group (Kent Gardens Trust) assisting professionals to review information on key local heritage assets so that they can be included in a local list. The model was extremely successful and would lend itself well to projects aimed at other types of asset.

34) What characteristics do you think makes a good place to live?

Places that are desirable to live are those that are well designed, with good quality infrastructure, including access to quality education, transport links, community facilities.

The historic environment can be used proactively to help guide successful development. If the new developments have no sense of place, no sense that they belong to the towns and villages to which they will mostly be appended, then they are

more likely to experience social and economic problems. To achieve this sense of place it would help if the new communities worked with the 'grain' of existing patterns of settlement and landscape in Medway, complementing what has gone before.

35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development?

The river frontage of Medway, both in the urban areas and in the countryside, is in many places very attractive. It contains numerous historic features relating to the commercial, industrial and military history of Medway that have the potential to be developed as tourist attractions (e.g. the fortifications at Grain) or to be included in trails or apps. Development in such areas should be preceded by careful assessment to ensure that the historic character is retained and if possible enhanced.

Medway's countryside is also distinctive but perhaps undervalued relative to other parts of the county. Like much of Kent, Medway has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. English Heritage has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that Medway Council considers adopting the guidance as SPD, as part of the Local Plan process. KCC would be happy to discuss this further.

36) What areas of Medway have weaker character and what are the opportunities for improvements?

Many of the wharves and docks along the Thames and Medway are of historic importance and relate to earlier periods in Medway's commercial, industrial, military and maritime history. These areas are, however, often somewhat neglected and difficult to access. KCC would support the enhanced care and protection of such heritage assets based on an appropriate assessment.

37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?

Medway Council should encourage well designed, sustainable development, which is sympathetic to the surrounding environment. New developments have the potential to enhance or diminish the character of Medway. This will depend on whether or not the development follows the existing 'grain' of the area. New development should be laid out in a manner sympathetic to the existing network of boundaries, roads, and lanes. The Historic Characterisation mentioned above in response to Q32 is the most effective method to achieve this. Within developments, the design of buildings should also reflect local character in terms of their design and layout, massing and materials.

Where new development impacts on archaeological sites they should seek to minimise direct impact by engineering solutions or revised layouts. Preservation in-situ should be sought where possible. Developers should be required to develop meaningful heritage statements that identify the heritage potential of the site and assess the likely impact of proposals. Where archaeological remains are affected, pre-determination assessment of fieldwork may be necessary. In any such circumstances the KCC Heritage Conservation team should be contacted at the earliest opportunity.

38) How should the role of Hoo St Werburgh as a service centre be developed?

Further growth in Hoo is also considered in the consultation document, enabling the provision of facilities that are of benefit to the whole of the Isle of Grain. KCC would support further development at Hoo, providing the necessary infrastructure is provided in a timely way.

39) What provision needs to be made for employment in rural Medway?

The Plan needs to be flexible to allow changes to the rural business sector.

40) How should the Local Plan address the need to maintain and improve access to services in rural areas?

41) What consideration should be given to strategic infrastructure and development in rural Medway?

Rural areas in Kent face similar challenges. Consideration needs to be given to rural proofing to ensure the Local Plan objectives can be achieved equitably across Medway. Medway Council should actively engage with KCC and its neighbouring borough and district councils as the most appropriate service centres may be outside the Medway boundary, in which case LTP4 and other Kent strategies, policies and plans will affect accessibility. LTP4 will commit to working collaboratively with other Authorities.

42) How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?

Medway Council need to work closely with the Parish Councils and other parties who are producing the Neighbourhood Plans to ensure that local needs are addressed.

43) What changes to the built environment could facilitate healthier communities?

KCC is developing an Active Travel Strategy (ATS). Medway's Plans should align with this and look for areas of synergy where the walking and cycling network can be joined up. There may also be opportunities for joint promotion of active travel, along with other Local Authorities. Partnership working can help to maximise the returns from investment. KCC's ATS is produced jointly between Highways & Transportation and Public Health.

The Local Plan can encourage walking and cycling through the provision of safe and accessible routes. Green spaces/networks should be incorporated into new developments.

44) How can the Local Plan encourage access to healthy food options and growing opportunities?

The Local Plan could encourage allotments to be included in development sites to give residents the opportunity to grow their own produce.

45) How can the Local Plan most effectively promote greater physical activity in Medway?

The Local Plan can encourage walking and cycling through the provision of safe and accessible routes. Community sports facilities should be encouraged as a priority infrastructure. Green spaces/networks should be incorporated into new developments.

46) What changes to the current siting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and/or to integrate health services in local communities?

The Kent and Medway Growth and Infrastructure Framework (GIF) highlights that existing health services in Medway are unsustainable and will require a significant redesign and modernisation to move towards an integrated care strategy. This will place additional pressures on consolidation and refreshing existing healthcare. Medway is near capacity in bed provision, and moving forward, faces capacity issues in the face of significant housing growth. Medway has average patient list sizes above the UK guidelines. The GIF identifies that there is a deficit in number of GPs required to support existing and proposed population across Medway and that there is uncertainty over future needs as well as uncertainty over the plans of Medway Maritime Hospital.

Medway Maritime Hospital also serves the wider community including residents in Swale and Maidstone. The cumulative impact of developments in these Boroughs could put further pressure on the hospital resource. Medway need to understand these additional pressures.

47) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?

KCC anticipates that Medway will need between 14 to 17 FE of primary and broadly 16FE of secondary school places. The consultation document states that all Medway schools are full or nearly full. There is a similar situation in Kent, particularly in north Kent, where schools are at or close to capacity, and KCC could not accommodate any additional pressure from Medway if the housebuilding trajectory is faster than the pace of the school build.

In terms of school patterns, there are existing KCC primary schools that import much of the intake from Medway, such as Tunbury, Bredhurst, Wouldham and the Snodland schools. There are, however, a number of children that travel in the opposite direction, particularly for secondary schools, where parents want to access their nearest grammar school.

It is important that KCC and Medway Council work together as early as possible to consider the cumulative impact, and to understand the expected pupil product rate taking into account the Medway developments and those developments within Kent. Ensuring that future developments are viable and are able to fund the level of infrastructure required to support the level of growth anticipated.

The GIF anticipates that Medway will require 786 additional primary school places by 2021 at a cost of £37,960,000 and 2,065 secondary school places at a cost of £39,900,000. This is based on the expectation that 22,220 homes will be built between 2011 and 2031. It also identifies that there is a lack of sufficient reception year places in Medway. Special School expansions are also planned within the commissioning plan period at Dancourt and Abbey Court Schools in Gillingham.

The provision of higher education in Medway remains important to Kent's growth aspirations. Medway is one of the primary centres for higher education as the University of Kent and Canterbury Christ Church; the University of the Creative Arts and the University of Greenwich are located there.

48) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?

There are concerns over the impact that the additional 29,264 houses might have on Kent services and infrastructure. New development will be expected to deliver the necessary infrastructure to support the development to help develop sustainable communities. Medway Council need to understand what the cross border interactions are including travel patterns between the areas and what impact housing growth could have cumulatively. Consideration needs to be given to how KCC's Education Commissioning Plan could be affected, if the growth in Medway has an impact on KCC costs this should be accounted for in their Local Plan. The cross boundary implications in relation to service provision will require inter authority working and KCC are willing to work with Medway to address this.

49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

The integrity of the open space estate should be preserved to the greatest extent possible. Once any part of the estate is lost to development, it can never be brought back. The document identifies a current deficit of certain open space uses, thereby enhancing the need to keep what is currently provided. More importantly, the document predicts a significant need to increase provision.

50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

Yes a local space standard should be set in order to ensure appropriate open space is included within local developments.

The old standard used by most authorities for many years, 6 acres per 1,000 population is no longer the standard. Every Borough is different and there are significant differences within each Borough. Every Borough should set its own local space standard based on its own assessment of the demographics and the current space provision and what those spaces are used for.

51) Should we move to a multi-functional hub model of provision, and what might this look like in practice?

Medway should only move to a multi-functional hub if many other factors enable this model e.g. is public transport or cycle/walk paths in place to enable the population to get to the hub.

52) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

There should be a mixture of the two approaches. Small on-site open spaces are useful for the residents but off-site provision of a bigger nature for more formal sports such as football, rugby and cricket should also be provided.

53) What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?

Consideration could be given to long term leases, at reasonable rates, rather than full asset transfer. This would mean that if any issues arise the local authority still has ownership of the land and would hopefully be able to ensure it continues to be used for its intended purposes

Although Councils do not want to build continuous revenue responsibilities, there can often be difficulty in finding the right organisation to take on the responsibility of managing the sites. A balance between Council and Community ownership would be the best option.

54) What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?

Sport and Physical Activity has a key role to play in local health and wellbeing of residents and therefore provision for sport, both indoor and outdoor should be included in the local plan. This should be ideally linked to any Medway Sport and Leisure Strategies.

Provision in the Local Plan for Sport based on the established and well understood standards of provision should be maintained at all costs. KCC support dual use and joint provision of sports facilities on school sites; however, there is always the difficulty that if the legal status of a school changes (e.g. from LEA to Academy) there can be difficulties in ensuring the continued use by the public. Significant negotiations can be fruitful with developers in enhancing a school sports hall to 'community standard' as against providing a community sports hall as well as a school sports hall.

55) How should the Local Plan address the aspirations for a new stadium for Gillingham FC?

It may be better to investigate whether the Stadium can be updated, and seating capacity increased, rather than find another site thereby taking away another open space which could be used for another purpose.

56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

It is considered that the best and most versatile agricultural land should be safeguarded where possible, but if significant development of agricultural land is necessary, areas of poorer quality land should be used.

57) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?

There are a number of AQMAs in the Medway area. These will need to be taken into consideration when planning for new development. Also, careful planning will need to ensure that further AQMAs are not created because of new development. It will be necessary to incorporate mitigation measures into new schemes to ensure the health of the residents is not affected by pollution from additional trip generation. Electric

charging points and incentives to encourage using public transport and walking and cycling should be explored. The Kent and Medway Air Quality Partnership have recently produced guidance on this agenda.

58) What approach should be taken to planning for land won minerals in Medway?

The Medway area has both significant reserves of primary land-won mineral resources (unpermitted but potentially very significant at 3.3 to 4.5 million tonnes) and significant reserves (1.2 million tonnes at Hoo St. Werburgh) of river terrace sands and gravels. Other mineral deposits that may be of economic importance into the future are the high purity chalk deposits at Cliffe, cement manufacturing chalk in the Medway valley around Holborough (permitted for chalk manufacture) and engineering clay (the London Clay) on the Hoo Peninsula.

In order to safeguard these important resources in accordance with the National Planning Policy Framework (Section 142 of the NPPF discusses the need to ensure the conservation of sustainable mineral supply) any Medway Local Plan should identify Mineral Safeguarding Areas and policies to ensure that the minerals of economic importance are conserved for future sustainable supply through the prevention of sterilisation. This is the basis for having an NPPF compliant approach to planning for land won minerals. Data on the occurrence of all important economic minerals are available from the British Geological Survey (BGS) and should inform the safeguarding mineral policy of any future plan.

The contributions of secondary and recycled aggregates from industrial activity and waste related processing are often significant to overall supply of aggregates. These also supplement finite primary land-won materials. In order to comply with the NPPF this should be part of the considerations as to how overall aggregate needs will be met over a given plan period. The level of supply per annum (as identified by Local Aggregate Assessment monitoring), to meet market requirements is also a fundamental part of mineral planning. The differing minerals have their specific requirements, with regard to land-won aggregates a 7 year landbank should be maintained year on year throughout a plan period (Section 145 of the NPPF).

Given that minerals are natural geological features and are essentially finite in their occurrence (in particular aggregates laid down as superficial deposits) it can be the case that identified society needs will outstrip the naturally occurring supply. In such circumstances the inability to maintain aggregate landbanks at the NPPF required level should be offset with imports via wharves and railheads. Medway has significant capacity in this regard and has an undeniable regional role significantly greater than required to meet identifiable local needs.

As such, importation infrastructure should be safeguarded with the same local plan policy rigour that applies to sustainable primary land-won minerals, as required by Section 143 of the NPPF. For example, losses in mineral wharves appears very difficult to replace given the degree of competition for available previously developed land for non-minerals related development in the wider South East. It should also be noted that in the Examination Hearings for the Kent Minerals and Waste Local Plan last year and subsequent modifications to the Plan's safeguarding strategy, the important role that Medway plays in terms of importation facilities in the region was recognised. The capacity and availability of the infrastructure within Medway appears to be key driver in the removal of a Kent 'test' for the loss of mineral

infrastructure within the KCC area where it may be threatened by non-mineral development.

59) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?

Safeguarding will remain important as required by the NPPF; it includes planned and potential mineral wharf sites as well. This is due to the fact that indigenous mineral supply (aggregates) are running low and once depleted will have to be supplanted with imports.

60) What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?

From the data available it is clear that the Medway area has significant arising's of waste materials from the main waste stream types. Some 140,000 plus tonnes come from the municipal (MSW) and hazardous waste streams. The commercial and industrial (C&I) and the construction, demolition and excavation (C,D & E) are likely to be significant sectors that may well mean that the Medway area produces some 300,000 tonnes per annum (as an estimate) overall. Though the amount of waste managed by the area far exceeds this, as records show it handles over 0.65 million tonnes per annum. This demonstrates how waste movements and management capacity are clearly responding to market forces that are far greater than the administrative boundaries of the area. The main conclusion that may be drawn from this disparity of arising's over capacity is that the Medway area has an important regional role in waste management in the South East, and no doubt this includes significantly the Kent county area.

The central principle of the Waste Framework Directive is to manage waste arisings proximately and to achieve net self-sufficiency. The Medway area is demonstrating that it is more than meeting this objective. However, through time with changes in economic cycles and local economic structures and population growth will bring changes to the resultant waste streams that will require changes to the area's waste management infrastructure. To not respond to these changes over the period of the Plan on the basis that net self-sufficiency has essentially been attained could well result in deterioration of the strategic role the Medway area has, and which Kent and the wider locality are significant stakeholders.

This approach is in accordance with the requirements of the Waste Management Plan for England (2013), which states local authorities should:

- i. work jointly and collaboratively with other planning authorities to collect and share data and information on waste arisings, and take account of:*
- ii. waste arisings across neighbouring waste planning authority areas;*
- iii. any waste management requirement identified nationally, including the Government's latest advice on forecasts of waste arisings and the proportion of waste that can be recycled; and*
- iv. ensure that the need for waste management facilities is considered alongside other spatial planning concerns, recognising the positive contribution that waste management can bring to the development of sustainable communities.*

Therefore Kent County Council wishes to be engaged with Medway Council to ensure the wider waste management role of the area is fully taken into account by the Medway's emerging Local Plan.

61) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?

Sustainable development should include well designed, well connected communities with a mix of housing types, good access to key services, employment, in a clean and safe environment.

62) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?

Ensure new developments provide facilities and opportunities for new and existing residents.

63) What measures should new development take to mitigate and adapt to the risks posed by climate change?

New development should avoid areas of high flood risk. They also need to be designed to provide for resilience to climate change, including use of Sustainable Urban Drainage Systems (SUDS), etc.

64) How can existing development and communities mitigate and adapt to the risks posed by climate change?

Existing developments and communities need to take measures to reduce energy and water use and reduce emissions. Retrofitting existing homes with LED lights, cavity wall etc. can assist. The Kent and Medway Warm Homes initiative could also be used.

District heating plants could connect new as well as existing homes.

65) Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?

The whole of south east England is classified as an area of 'serious water stress'. This is reflected in water company plans and it is vital that this is also reflected within Local Plans.

Water supply within the Medway Unitary area is the responsibility of Southern Water (SW) but this is an issue that is not just restricted to SW's 'Kent Medway' supply zone: Some of that water comes from the upper reaches of the Medway river catchment through resources such as Bewl Water reservoir that are shared with other water companies and serve a wider strategic role across the entire region via an increasing inter-connected network of strategic pipelines that allow bulk transfers of water between resource zones and between company supply areas to help address localised shortages.

All the local water companies are pursuing demand management options as an increasingly important part of their Water Resources Management Plans (WRMPs) and this includes the retrofitting of water efficient fittings within existing homes and commercial properties. Such options have been selected by the water companies because they are a cheaper alternative to additional major water supply infrastructure and therefore help to minimise customer bills.

The optional national standards for water efficiency involve the use of simple, proven water efficient fittings within new properties at almost no cost above that of providing high water use fittings and their inclusion can help to minimise customer bills and future potential water shortages.

The main sources of evidence are:

- *The Thames River Basin Management Plan*
- *The Medway Catchment Abstraction Management Strategy and Abstraction Licensing Strategy*
- *The WRMPs for Southern Water, South East Water and Affinity Water*

The Local Plan should also be consistent with the Kent Environment Strategy.

66) How should flood risk and SuDs be taken into account in planning for growth in Medway?

67) What safeguards should be put in place to ensure future requirements for improved flood defences are not compromised?

A flood risk assessment should be undertaken for the Medway area to understand where the key problem areas are.

SuDs should be designed into development sites particularly those in the flood risk areas.

68) Should we allocate sites or zones for wind energy development?

69) What policies should we set for other forms of energy development?

70) How should we take advantage of opportunities for use of waste heat from the large-scale energy generation on the Peninsula?

Opportunity areas should be considered, the potential in the area particularly on the Isle of Grain should be explored.

71) What infrastructure is required to support Medway's growth over the plan period?

The Kent and Medway Growth and Infrastructure Framework makes an assessment of infrastructure, including transport infrastructure, required to support growth over the plan period to 2031. It identifies that significant improvements to the highway network will be required to support growth.

Some of the priority infrastructure schemes identified in the GIF include;

- *Improvements to the A2/M2 corridors to address local capacity issues, congestion and facilitate growth.*
- *A transport strategy for Strood and the Medway City Estate to deliver improvements to traffic flows and upgrade the public realm.*
- *new station at Strood and upgrades at Rainham and Chatham to improve train capacity and the passenger experience.*
- *A289 Four Elms to Medway Tunnel improvements*
- *Improvements to the A229 corridor between Maidstone and Medway Towns*
- *Stroud and Chatham Town Centre Improvements*
- *Public Transport Improvements throughout the Medway towns*

Within the Issues and Options document, Medway need to acknowledge the proposed Lower Thames Crossing (LTC) Option C.

The pressure a new LTC east of Gravesend should not be underestimated. Additional pressure will put on some particularly congested corridors such as the A2, A289 and the A226 (Gravesend Road). It is expected that Medway will be properly engaged in the LTC process, particularly as Option C is likely to see a change in existing traffic patterns across the wider Medway area, notably east-west movements.

72) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

Some of the possible measures that are relevant to increasing public transport usage, walking and cycling rates are:

- *Use of 20mph limits where appropriate*
- *Improved safety on public transport networks*
- *Maintenance of footways and cycleways*
- *Utilisation of the public rights of way network*
- *Promotion of active travel as a healthier mode of transport*
- *Accessibility improvements*
- *Integration of the public transport network, for example quality interchanges*
- *Creation of connected door-to-door journeys*
- *Affordable public transport*
- *Multi-agency working to engage the public and increase uptake of active travel.*

73) What provision should be made for car parking?

Medway will need to set local parking standards taking into account the type, mix, use and accessibility of new developments.

Provision for electric vehicle parking spaces should be included.

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

75) How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?

This will need to be considered as part of the master planning process.

76) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?

The Council will need to ensure that there is sufficient viability to enable contributions towards infrastructure without stalling development. Delivering infrastructure at the appropriate time and locations and meeting the needs arising from new development will be important.

77) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

KCC would support this approach as the land values in Medway vary greatly and we need to ensure that viable sites are brought forward.

78) How can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?

Working with partners and organisations will be important. Prioritisation of infrastructure is key and KCC would be willing to assist with helping to prioritise schemes. The GIF can play a role here in helping the authority to identify what these priority schemes are, and where there are funding gaps, where KCC and Medway can work more closely together to attract investment to Kent and Medway

79) What use should be made of new methods of delivery to help speed up the planning process, and how can we ensure that quality is not compromised in favour of speed?

KCC have concerns with the 'Permission in Principle' policy. Although a site may be suitable for redevelopment, it should not automatically mean that any housing proposal that is put forward would be acceptable and should be granted permission in principle. This could lead to poorly designed inappropriate development. There is also a danger that the proposed changes will result in development which is unsustainable and therefore not in line with the overarching aim of the NPPF.

80) Are the development principles right? Should other guiding principles be introduced?

All new development should consider the surrounding environment and consider ways to mitigate any potential harm that maybe caused and look for ways to enhance and improve access to it.

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

KCC are in general agreement with the assessment of the advantages and disadvantages of the various development type options.

KCC support development within the current urban areas rather than substantial development on the edge of the towns on greenfield sites and in the greenbelt.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

A combination of development types, depending on location, will be needed to meet the growth requirements.

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

High density development should be considered in the town centres. If additional sites are required, consideration may need to be given to the existing employment areas for mixed use development. These could provide the opportunity for residents

living close to where they work; however, this would require careful consideration and the potential health and environmental impacts would need to be assessed.

84) Should the green belt boundary be reviewed?

It may be necessary to consider a review of the green belt boundary if sufficient sites cannot be found to accommodate the expected housing required. KCC would support further exploration of the brownfield sites in the existing urban areas prior to a review.

85) What provision should be made for mixed use in residential developments, both high density and lower density?

KCC supports mixed use high density development in the town centres.

86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?

KCC supports the proposal to explore the potential for residential development in Chatham town centre and the waterfront area. There are good transport links with the recent redevelopment of the bus station and improvements planned at the railway station. Concentrating mixed use high density development in these areas is a sustainable option and would take the pressure off greenfield sites in the countryside.

Name: John Jones

Reference

97

Organisation

Medway Urban Parks and Green Space Forum

On Behalf Of

Type of Consultee

Charity/Community/Faith Group

Medway Urban Parks and Green Spaces Forum MUPGSF

Medway Local Plan Issues and Options

The Forum has discussed the issues at a public meeting and groups have considered the issues as well. The opinions and views expressed here cannot bind any group or individual.

MUPGSF has reviewed the issues raised in the section on Open Spaces on pp 66-67 in detail. Responses to questions 49-53 are included below.

Q 43 MUPGSF believes that the Plan should explicitly state that the integrity of the existing open spaces estate should be safeguarded. Where there is an overarching need to take land out of POS other land and resources to at least the same value should be made compulsory.

Q 50 MUPGSF believes that it is appropriate for the Local Plan to include a stated local space standard which should be no lower than the existing level of 3.25 ha per 1,000 population. It follows therefore that the estate should increase in line with forecast population increase. MUPGSF believes also that there should be a statement of aspiration towards the provision of adequate POS at a finer-grain level than the overall Plan area, for example for each major urban area possibly defined by wards or small groupings thereof. These areas would complement the major existing zones of Medway Park, Capstone Valley and Riverside. Linkages between urban parks and other POS zones should be provided in the form of linear corridors which are especially necessary for wildlife.

Q 51 MUPGSF believes that the management of POS should attempt to mediate demand so that the “destination model” of existing successful major POS such as Riverside and Capstone Country Parks are not subject to extremes of pressure from numbers of users. It follows, therefore, that some blending of activities in particular locations will be required, especially for uses relevant to different age groups and those to encourage out-door use for improved health. On occasions this will mean possibly some relative reduction in the traditional park uses such as team sport provision.

Q 52 New developments should contribute to the POS domain. How this is achieved will depend on the scale and location of the development. Decisions as to what is needed and where, are made more effectively and fairly where there is a clear forum in which major interests are represented rather than by individual agencies. It follows therefore that a balance between supporting the existing estate and new provision is best achieved after review at the local level. New developments should provide possibilities for small-scale but high impact urban greening in the way understood by the local Full Frontal interventions.

Q 53 MUPGSF is strongly of the opinion that the historic development of the open space estate and its management is a tried and tested example of the best of civic policy which has nurtured a mutual obligation between citizens and local government. The existing management model of POS should provide the basis of its future. To improve this, MUPGSF believes that greater clarity is needed for roles and responsibilities with particular reference to accountability. Reinforcement of community involvement is necessary. To achieve this, more effort is needed to ensure that the present reactive approach which envisages civic engagement mostly as volunteering becomes more long-term in its vision. This means gathering more co-ordinated information about actual and potential workforce competences and training and potential sources of both capital and revenue funding in order to provide what is needed both locally and overall.

General Points

MUPGSF recognises the need for further development in the plan area over the plan period. In particular it recognises the need for considerable housing development. The provision of this should be as far as possible defined in these ways:

- 1 By use of brown-field land. This will include development at the Lodge Hill -Chattenden site but have regard to the special needs of nightingale habitat conservation on Lodge Hill. This point is not agreed by all members. The minority view is that no development should be allowed at this site.
- 2 By designating locations, especially those close to existing town centres such as Chatham and Gillingham for increased densities. This has implications for the sort of housing made available and possibly also building height.
- 3 There should be a general presumption against development in areas of high quality agricultural use such as along the Lower Twydall and Rainham river lands north of the railway line.
- 4 The maintenance of defined boundaries between settlements to preserve identity and make available open space as well, should be a major consideration. This means that development in the Capstone Valley should not be encouraged.
- 5 Taking into account the Kent Gardens Trust assessment of Medway's historic designed landscapes such as Rochester City Centre, the Dockyard or Upnor.

Name: Trevor Reynolds

Reference

98

Organisation

On Behalf Of

Type of Consultee

Member of the public

maryott, kyle

From: [REDACTED]
Sent: 29 February 2016 16:58
To: policy, planning
Cc: [REDACTED]
Subject: Fwd: Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

Sorry, originally sent to the wrong address

-----Original Message-----

From: reywell [REDACTED]
To: planning.policy <planning.policy@medway.co.uk>
[REDACTED]

Sent: Mon, 29 Feb 2016 16:53
Subject: Local Plan

I want to make a comment or two about transport infrastructure in the Medway Valley and in particular around Halling, where I am a parish councillor. I did attend a presentation at Halling Community Centre and I was surprised to find that the consultation ends today, so forgive me if this is a bit rushed.

As time goes by, the pressure on traffic using the A228 road which, in our area of course, links Junction 2 of the M2 with Junction 4 of the M20 will continue to mount. Already the road becomes gridlocked when there are temporary traffic lights or when either of the motorways is suffering delays. At those times traffic uses the A228 to change motorways. When the A228 is slow or stopped, traffic tends to divert through Halling using the weight restricted weak bridge in doing so.

When the new bridge across the Medway opens later this year, traffic will begin crossing over to the A228 and will gradually increase until the huge development at Peter's Village is completed. This will add to the burden of uncompleted new developments at Leybourne Grange, Holborough and our own St. Andrews Park in Halling. Some additional development sites are identified on the consultation document.

Ideally there will be proposals to make the length of the A228 between the two motorways, a dual carriageway throughout, but even that will not prevent gridlock at times. Having said that, the cost of making the A228 into a dual carriageway would be huge and would inevitably involve demolishing a number of properties in order to achieve it.

When looking at transport infrastructure, very little notice ever seems to be taken of public transport and in particular the Medway Valley Rail Service. I know several people who commute to London by driving to Strood, Rochester, Chatham or West Malling to park and catch the train. No doubt there are many on the other side of the river who do something similar.

What we need, I believe is a Medway Valley Parkway Station on the Medway Valley line, which would take some traffic off the A228 and away from town centres. It might be feasible on the remains of the Cemex site at Halling, or within the Medway Valley Park between Rochester and Cuxton. If you have ever looked at that site in the evenings you will know that the car park is often almost filled to capacity. The Medway Valley line runs within metres of the site and a station there would take a significant amount of traffic from the roads.

All of this of course would involve joined up thinking between Medway Council, Network Rail and the current franchisee, South Eastern Railway.

Best wishes,

Trevor Reynolds

Name: Sue Saunders

Reference

99

Organisation

On Behalf Of

Type of Consultee

Member of the public

From: [REDACTED]
Sent: 26 February 2016 20:09
To: policy, planning
Subject: Local Plan

Categories: Blue Category

Dear Sir

I wish to make the following comments with reference to the Medway Local Plan Consultation document Jan/Feb 2016 The Environment

Having attended the meeting at Gun Wharf ,i felt that there was a lot of words about the document but not a lot of solutions

Medway is situated with in the beautiful North Downs and the stunning river estuaries with sites of international importance and in its drive to expand its housing and industry these area are under threat. With Medway population expected to increase to 322700 these people will need housing schools hospital and places to work, the traffic is at saturation point now as soon as there is a problem on the M2 Strood grinds to a stand still,then the traffic spread out to the villages trying to find a way round these then become rat runs making the lanes hazardous to the walkers cyclist and horse riders that use these lanes. Medway's rights of way network 313 Km (very little bridleway) will become more fragmented as developments take place,paths that once went through country side will then be through a housing estate ,access to the river is of paramount importance old access points must be protected and new ones created

As the demands on the countryside increases it is vital that the wildlife etc is protected whilst ensuring access is both maintained and increased for ALL users including horse rider who have very little 7%of Medway population will want to ride either at a riding school or have their own ,this brings in a lot of money into the rural economy.

As the budget for rights of way work is cut year after year how are these new ideas going to be funded with out selling off the "family silver" ie the countryside for housing or the countryside park open spaces ,river banks the list goes on.

It is vital that the groups that have vita local knowledge are consulted with as the plan develops to ensure we all get what's good for Medway

Yours faithfully
Mrs Susan Saunders

Medway Local Access Forum /British Horse society Access rep for Medway

Name: Rita Hunt

Reference

100

Organisation

On Behalf Of

Type of Consultee

Member of the public

Local Plan Consultation

Open Spaces promote and enhance the physical and mental health of residents and workers. Protecting these should be a priority in the Local Plan. Access to the riverside, especially for walkers and cyclists should be guaranteed. We do not value our River, PROW & Open Spaces enough. Improving the PROW footpaths by closing the gaps and ensuring continual, essential maintenance is vital to making Medway a healthier place to live and work.

Improved access to Open Spaces and facilities for families would encourage healthier communities. Schools and families visiting need parking, cycle storage, toilets, refreshments and dog bins. Dog fouling in parks and on our streets needs to be tackled with fines and education.

More support should be given to 'Friends' Groups to allow them to take ownership of their local green space. The smaller open spaces in high density housing are a 'life-line' for families with a limited income. However little provision is made for the elderly or wheelchair users, very few hard paths and even fewer seats.

Medway Hospital is failing. More Clinics are needed throughout Medway, especially Strood to relieve the over stretched hospital.

All new build should make provision for affordable housing and older people should be able to have their properties adapted when needed.

Public transport should have better links to shops, trains, schools, work places and green spaces. Buses could be cheaper with family passes to encourage outdoor activities.

People work outside Medway for better wages and prospects. Incentives to work locally could include free bus passes and sport facilities. Businesses should be encouraged to participate in healthier lifestyles for their work force.

Litter and waste has become a mayor blight in Medway and this is a barrier for tourism. Wheelie Bins for all rubbish would reduce the amount of litter on our streets. More effort is needed to enforce the laws on fly-tipping. Medway should have its own disposal facility.

Finally, our High Streets are dying because too many estate agents, nail bars and hairdressers have taken over. We need to bring back our local shops.

Comments from: Rita Hunt [REDACTED] on behalf of herself, Friends of Rede Common and Medway Local Access Forum.