

**Representations by Barratt Strategic****Medway Council ref 04****Medway Council's Core Strategy – Examination in Public – response to the issues raised by the Inspector****Matter 2 – Spatial Vision**

- a) Does the CS present a clear spatial vision for the Borough? Has it been positively prepared and will it deliver sustainable development in accordance with national and regional policy or identified needs?
- 2.1 The spatial vision appears to be centred upon the regeneration and growth of the main urban regeneration areas, the development of Lodge Hill (Chattenden), and the preservation of the rural areas. One of the things the CS fails to have regard to/promote is the continued vitality of the rural areas and the associated preservation of rural services. This appears to conflict with the aims and objectives of policy CS31 and paragraph 10.69 for example, and can in part only be achieved by the council acknowledging the role of residential development in maintaining vibrant rural communities. Small scale rural development can actively assist in maintaining rural services and thus the sustainability of rural settlements. The lack of any acknowledgment of the need for sustainable small scale growth in the rural settlements is such that we believe the plan to be contrary to the aims and objectives of the NPPF and the presumption in favour of sustainable development.
- 2.2 In addition to the above we believe there to be a fundamental contradiction between the spatial vision and spatial objectives.
- 2.3 Whilst the vision promotes the delivery of 17,930 over the plan period (2006-2028) i.e. 815dpa, spatial objective 9 looks to 'ensure there is sufficient housing to meet people's needs....' As per our reps on matter 1 the North Kent SHMA identifies a requirement for 878 dpa (19,316 over the plan period). We fail to see how the plan can be said to be positively prepared when this apparent anomaly has not been addressed
- b) Is the Plan founded on a robust and credible evidence base? Is it flexible and able to be monitored? What are the trigger points/actions to be taken if monitoring indicates that targets are not being met?
- 2.4 Whilst Medway Council have, within their evidence base a SHMA that is in our opinion both up to date and credible, the CS does not appear to be founded on the recommendations of that evidence base, nor a clear explanation provided within the SA as to why the recommendations of the SHMA have been ignored.
- 2.5 Turning to the SHLAA (Jan 2012), whilst this may be up to date, we do not necessarily believe it to be credible. Table 1 (p28) of the SHLAA suggests that Lodge Hill Chattenden will deliver the following:-

SLAA Ref	Site Name	Site Source	Mixed Use	2012- 17	2017-22	2022-27	2027-28	Total 2011-2028	2028/29 +	Site Total
0050	Lodge Hill	Medway LP 2003	Yes	975	1500	1500	300	4275	725	5000

- 2.6 The inspector will no doubt be aware that the outline application for Lodge Hill was submitted in November 2011 (MC/11/2516 refers), and is as yet undetermined. Indeed it is the subject of a holding objection for the Highways Agency, and a formal objection from Natural England. In addition Southern Water have highlighted potential capacity constraints at the Whitewall Creek WWTW that may have implications on occupancy levels that can be accommodated at Lodge Hill before major infrastructure works need to be undertaken. Copies of all three reports are attached for information.
- 2.7 Based upon the above there can be no guarantee that planning permission will be issued imminently. As such, and as subsequent infrastructure works and reserved matters will need to be resolved before works can commence on site, we do not believe any completions are likely to occur until 2014 at the earliest. Thus the site's ability to deliver 675 units by April 2016 is in our opinion totally unrealistic. Even taking the work undertaken for Land Securities (the promoters of Lodge Hill) by CB Richard Ellis which suggests with 6 house builders delivering 50dpa the site could only deliver 600 units by 2016. As per our reports on the CS Publication Draft (August 2011), we believe, given the site's location, current market conditions, and the build rates that have been recorded by national house builders in their most recent trading reports that delivery rates are more likely to be circa 28- 33dpa (including affordable units). On this basis and assuming 6 outlets (which again may be overly optimistic in the current market), Lodge Hill Chattenden would in our opinion only deliver the following at best :-

SLAA Ref	Site Name	Site Source	Mixed Use	2011/12-2015/16	2016/17-2020/21	2021/22-2025/26	2026/27-2027/28	Total 2011-2028	2028/29 +	Site Total
0050	Lodge Hill	Medway LP 2003	Yes	396	990	990	396	2772	2228	5000

- 2.8 We believe our position on delivery rates to be supported by the work undertaken by Buchanan's in 2005 (Housing Delivery on Strategic Sites) that was submitted to the East of England Regional Spatial Strategy EIP; the work undertaken by Hampshire CC on delivery rates in Hampshire and independent research by the University of Glasgow on Factors Affecting Housing Build-out Rates undertaken for CLG's Housing Markets and Planning Analysis Expert Panel (Feb 08). All three reports were referred to in our previous representations and can be made available to the inspector if she feels they would assist.
- 2.9 In the context of the above we continue to believe that the delivery rates proposed at Chattenden and the resultant housing land supply requirement has not been fully justified, that the CS is not effective as it will not deliver what it says it will, and that the plan is not, as per para 182 of the NPPF 'positively prepared'.
- 2.10 There is no flexibility within the plan to deal with the situation that may arise if, as we suspect, Lodge Hill does not deliver as planned. We believe that the CS should encompass either a reserve site to be released if delivery rates at Lodge Hill/ across the district as a whole fall 30% below what they should be. Thus said policy could suggest that if less than 680 units have been

completed at Lodge Hill by April 2017 (i.e. are 30% down on what they should be according to the LPA) a reserve site/s accommodating the shortfall (295 units or more if the shortfall is greater) should be released. Alternatively said policy could suggest that if deliver rates across the borough as a whole fall below 8,000 units by April 2017 (i.e. circa 10% down on what they should be) a reserve sites accommodating the shortfall (965 units or more if the shortfall is greater) should be released. In this context the Site Allocations DPD could be charged with identifying potential reserve sites should the need to release then occur. Perhaps in this way the council could also look at how maintaining the vitality of the villages and the introduction of neighbourhood planning could be bought into play to provide for the needs of the villages.

Alternatively, as suggested in our reps on the CS Publication Draft August 2011 (para 2.21), the council could look to allocate an additional strategic allocation (an extended Hoo)

- 2.11 For the record the inspector should also note that the findings of the Jan 2012 SHLAA do not tally with the December 2011 AMR, which at Appendix 2 (p168) suggests that Lodge Hill Chattenden will deliver the following:-

SLAA Ref	Site Name	Site Source	Mixed Use	2011/12-2015/16	2016/17-2020/21	2021/22-2025/26	2026/27-2027/28	Total 2011-2028	2028/29 +	Site Total
0050	Lodge Hill	Medway LP 2003	Yes	675	1500	1500	600	4275	725	5000

- 2.12 Clearly this contradiction needs to be resolved.