



## 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 3 – Housing supply and location**

a) Will the strategy deliver the number of new homes required to meet the RS requirements/ identified needs?

3.1 We do not believe the CS will deliver the number of new homes required to meet the RS. This is primarily because, as is evident from our reps on matter 2, we do not believe the CS will deliver the number of homes proposed at Lodge Hill Chattenden within the plan period. Given the fact Lodge Hill makes up over one third of Medway Council's housing supply after completions to date are taken into consideration (3895), any slippage in the delivery of Lodge Hill will have a significant impact on Medway Council's ability to deliver the RS housing requirement. It is therefore imperative in our opinion that a reserve site/ policy that triggers the release of alternative sustainable sites, is incorporated into the CS to provide for flexibility.

3.2 In addition to the above we do not believe the CS meets the identified needs of the area as set out in the North Kent SHMA (878 dpa (19,316 over the plan period)). As set out in our reps on matter 1 the difference between the RS requirement and that identified in the latter SHMA is some 1,386 dwellings. This is not an insignificant shortfall in an area identified for growth where there is an acute affordable housing need

3.3 In addition to the above there is also the issue of the deliverability of the other identified sites, which we comment upon below. What is in our opinion significant is the fact Medway Council indicate in their 2011 AMR that having delivered an average of 779 units a year over the past 5 years<sup>1</sup> they will all of a sudden be able to deliver in excess of 1000 units in 2015/16(+). There is no evidence that this is **realistic/achievable** and that the local market can actually accommodate this

b) Are the locations identified for the supply of new housing the most appropriate when considered against all reasonable alternatives?

3.4 Not only do we disagree with the council's appraisal of an extended Hoo (as set out in our response to question 95 of the CS Issues and Options consultation), we do not understand why, given the reps on the CS Issues and Options, the council did not then look at the merits of a smaller extended Hoo, or a smaller Capstone Urban Extension, smaller East of Rainham Urban Extension or a smaller North of Rainham Urban Extension to address the potential shortfall a reduced scale of growth at Lodge Hill would create. It is in our opinion entirely reasonable to have expected the council to do this in the circumstances, and the lack of any such assessment does in our opinion prejudice the credibility of the CS and calls into question whether the plan has been 'positively prepared'.

<sup>1</sup> 591 in 2006/7, 761 in 2007/8, 914 in 2008/9, 972 in 2009/10 and 657 in 2010/11 = 3895 in 5 years i.e. 779 pa.

- 3.5 As set out in our reps on the CS Issues and Options consultation, and borne out by our subsequent work we do not believe Lodge Hill will deliver any more than 2700 dwellings (say 3000 maximum) by the end of the plan period (2028). As such the council should have tested the merits of 3000 dwellings at Lodge Hill, and 1500 units in and around Hoo, St Werburgh, High Halstow and Cliffe Woods
- 3.6 A smaller extended Hoo would in our opinion facilitate a sustainable urban extension which could compliment the development at Lodge Hill whilst still respecting the character and distinctiveness of existing settlements.
- 3.7 There is no reason why an extended Hoo would conflict with the aims and objectives of policy CC6 of the SEP. Similarly we do not see why it would be difficult to assimilate an extended Hoo, especially a reduced extended Hoo, with existing communities. If taken forward in conjunction with a reduced Lodge Hill a reduced extended Hoo would in our opinion comply with policy KTG1 of the SEP.
- 3.8 In the context of the above, reducing the scale of development proposed at Lodge Hill and providing for a reduced extended Hoo could in our opinion help address the many ecological issues raised in connection with the development of Lodge Hill as currently proposed for 5000 dwellings + associated facilities. It could also facilitate a collaborative approach to be taken to local highway improvements and enhanced public transport links.
- 3.9 Having regard to the above we believe the council's assessment of the extended Hoo site is flawed. We do not believe the effects of a reduced extended Hoo, would be as severe or as negative as proposed by the council in the appraisal contained in the CS Issue and Options. Not only was the initial Sustainability Appraisal a lot less critical of the effects of development in this area (please refer to paragraphs 3.51 and 3.54 for instance), but we believe many of the issues identified by the council are capable of being addressed during the course of design process and thus are capable of mitigation.
- 3.10 In the context of the above we fail to see how the council can promote a policy that looks to secure the viability of rural settlements (CS31) yet at the same time does not look to make provision for any development in the likes of High Halstow, which falls within the extended Hoo area, and despite what is suggested in the SHLAA, is a sustainable location for a small urban extension – please see our reps on policy CS31 of the CS Publication Draft August 2011.
- 3.11 To conclude we believe the locations identified for the supply of new housing are not the most appropriate when considered against all reasonable alternatives, and that the CS is thus unsound/ has not been positively prepared.
- c) Is there a reasonable prospect that the identified sites are deliverable/developable during the plan period, particularly those sites that have been carried forward from the local plan?
- 3.12 We have already commented upon the deliverability of Lodge Hill in our response to matter 2b. As far as the deliverability of the other identified sites, are concerned, we made the point in our reps on the CS Publication

Document (para 2.23) that given the current state of the market many of the existing consents, and for that matter outstanding local plan allocations had not been taken up/ the consents were being renegotiated to accommodate an alternative mix that is less apartments orientated/ the scale of the S106 requirements were being reviewed.

- 3.13 This clearly has implications on the findings of the SHLAA and the Councils estimate of what can be **delivered** from these sites over the coming years.
- 3.14 This situation could, in addition, be exacerbated by the proposed changes to the triggers for and level of affordable housing provision, and changes to the renewable energy requirements, both of which will, we believe, reduce the level of windfalls and mean that many of the sites that are allocated but do not as yet have permission will be less viable. As such the level of development anticipated over the coming years may well be significantly less than the council anticipates. Again this will mean the housing land supply targets **will not** be met, which in our opinion means an additional strategic allocation and reserve sites should be identified now if the CS is to be **effective**.
- 3.15 In the context of the above we note that MC themselves recognise at paragraph 3.15 of their 'The Basis for Housing and Employment Growth Targets' Background Paper (2012) that: 'some key regeneration sites present delivery challenges and 815 will anyway require a sustained level of delivery well above the historic trend. Thus whilst MC in their Deliverability Background Paper (2012) refer in paragraph 3.3 to an identified pipeline of 20,918 representing a potential surplus of 1,346 it is clear from the Housing and Employment Growth Targets' Background Paper that the council themselves accept that despite what has been identified, not all this may come forward.
- 3.16 Having regard to the above we would also like to highlight the implications of the recently published NPPF in this regard. Given delivery rates over the past 5 years have fallen below the SEP requirement Medway could be said to have a 'record of persistent under delivery of housing', such that given paragraph 47 of the NPPF they should be identifying and updating annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. It is not clear from the CS and supporting documents that this is achievable and that the plan is therefore **effective** and **consistent with national policy**.