



Representations by Barratt Strategic

Medway Council ref 04

Medway Council's Core Strategy – Examination in Public – Additional Written Submissions on Matters to be debated during the course of the Resumed Hearing on Matter 3 - Housing Supply and Location

The outstanding matters to be debated on the 20th June are, we understand, the SHLAA and the issue of housing land supply/ the 5 year supply relative to the requirements of the NPPF.

Having regard to the issues raised in our reps of Dec 2010 on the CS Pre Publication draft, issues raised in our reps of Oct 2011 on the CS Publication Draft, and our reps on matters 1, 2, 3 and 5, and the debate thus far at the EIP we would like to highlight the following:

- 1) The housing numbers in the SEP are not a maximum – paras 7.6, 7.7, 7.8 and 7.12 and policy H3 refer;
- 2) The NPPF looks to 'boost significantly' the supply of housing – para 47;
- 3) The SHMA identifies a significantly greater need than the SEP – the NPPF stresses the need to 'meet in full' the objectively assessed evidence base. No evidence has been put forward as to why this can not be achieved;
- 4) Whilst we have questioned the scale of development that can be delivered at Lodge Hill within the plan period given various factors – up front infrastructure, ecological mitigation, and the dynamics of the housing industry, points supported by others, including the HBF (see letter of 24th May to Peter Court), the deliverability of this strategic allocation all told is now debatable given the evidence submitted during the debate on matter 5 by the RSPB;
- 5) There is then the issue of the Housing land supply identified in the SHLAA.

In our evidence we question the scale of growth identified in the SHLAA, as do others, including Land Securities (the promoters of Lodge Hill) in their reps on Paragraph 5.10. They say 'Land Securities considers that the Council's assessment on having a 'very healthy supply' of housing may be overly optimistic.'

We share that view. In many instances the SHLAA relies on old LP allocations to deliver, when they have not thus far, and looks to the extant consents to deliver what was originally proposed within the allocated timescales when many are looking to renegotiate/ delay delivery for good reason.

Given para 6.12 of the SHLAA (Nov 2010) we remain of the view that the SHLAA does not realistically test a sites deliverability as 'a detailed assessment of the economic viability of the sites' was not tested given 'time, complexity and cost constraints'

In addition to the above we would like to highlight the fact that if one looks at the AMR's Medway Council have produced over the years it is clear the LPA have consistently promoted high levels of delivery, especially in the latter part of the 5 year period, only then to recalibrate their assessment the next year in the light of changing market conditions. The table below shows this situation graphically and is we believe more informative than the table included in appendix 2 of the Councils response on matter 3.

	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16
AMR 2005	892	954	1497	1337	1125						
AMR 2006	562	630	916	1448	1156	870					
AMR 2007		591	647	1031	1433	1130	1390				
AMR 2008			761	1182	1048	1543	1260	937			
AMR 2009				914	1000	577	1104	1374	1685		
AMR 2010					972	591	634	632	1392	1349	
AMR 2011						657	700	676	726	758	1055

Appendix C of the CS makes it clear that Medway Council have not thus far met the SEP requirement, let alone the higher requirement identified by the SHMA. In addition, it is clear that they will not meet the requirement until post 2016/17, and only then if the sites identified in the SHLAA and Lodge Hill are delivering as predicted.

Even if, as some allege, windfalls/ the waterside regeneration sites provide more and can thus accommodate the shortfall (a view we do not concur with), the housing needs identified by the SHMA, in terms of unit mix would not be met/ policy CS15 (bullet point 6) would be prejudiced, and one has to ask whether this strategy prejudices future employment land supply, and thus in the long term will lead to the need to release greenfield employment sites.

In the context of the above, we note that Medway Council themselves have promoted very mixed messages about the level of supply. On the one hand they suggest in the CS (para 5.10) that they have ample supply to meet the SEP requirement and more; whilst, in the SA (Dec 2011) they suggest at para 4.11 that 'some key regeneration sites are difficult in terms of delivery', a sentiment reiterated in para 3.15 of the Housing Background Paper. Either the supply is suitable, available and achievable or it is not. Medway need to clarify this point/ likewise policy CS13 needs to be amended to make it clear that just because a site has been excluded from the SHLAA thus far that does not necessarily exclude it from inclusion in the site allocations DPD/ as a future development site.

Given the LPA's past failure to deliver and the continued inability to deliver, we would suggest the LPA fall within the category of an authority with a 'record of persistent under delivery' and that the CS should, given para 47 of the NPPF, be looking to provide for a 5 year supply + 20%.

Having regard to all of the above we remain of the view that the plan should provide for a contingency to meet this potential under delivery.

We have suggested either a policy as per Tandridge DC CS – see para 2.21 of Oct 2011 reps, or an alternative policy approach linked to under delivery – see para 2.10 of reps on matter 2. The alternative is to allocate an additional strategic site through the CS (such as the reduced extended Hoo we have been promoting), and to promote a more positive approach to alternative, sustainable, greenfield releases as per the NPPF.

Whilst the LPA would need to undertake additional SA work and further consultation, if an additional strategic allocation were felt necessary, these matters are in our opinion capable of being addressed through main modifications, and would facilitate a flexible, positively planned CS.