

**From:** Ivan Kingsley Smith [mailto:ivan@ks-surveyors.co.uk]  
**Sent:** 25 May 2012 15:47  
**To:** ldfprogrammeofficer  
**Cc:** Nicholas Kingsley-Smith  
**Subject:** Medway Core Strategy

For the attention of the Medway Core Strategy Program Officer

Dear Madam

Please find attached the following submissions:

- 1 Bakersfield, Station Road, Rainham (housing) together with an attachment letter from House Builders Federation dated 24<sup>th</sup> May 2012
- 2 Rochester Bridgewood, Maidstone Road, Rochester (employment)
- 3 Mill Hill, Gillingham to be read in conjunction with the representation being filed to you directly by John Collins of DHA Planning (Gillingham Football Club)

As advised by you to Nicholas Kingsley Smith, it is acceptable to post three paper copies of each and this is hand.

Kindly acknowledge safe receipt.

Regards

Ivan Kingsley Smith, MRICS

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24 May 2012

Dear Mr Court

### **MEDWAY CORE STRATEGY**

As I explained to you over the phone, owing to resource constraints, the Home Builders Federation (HBF) was unfortunately unable to submit representations to the various drafts of the Medway Core Strategy. However, it was hoped that after the failure of the Council with its previous attempt to prepare a core strategy it would have adopted a more realistic approach to the provision of both housing and employment land opportunities. Having read the new document I have reservations as to whether the proposed strategy will enable this. This is unfortunate, especially as the Framework attaches considerable importance to local authorities taking a realistic approach to assessing their housing and other land use requirements (for example paragraphs 14, 17 – core planning principles, and 159). In view of the Government's expectations as to the role of planning in supporting economic growth I would have expected a more positive plan and one that created the type of conditions necessary to facilitate development.

I have had a look at the housing trajectory. The HBF is concerned to read that the Council does not expect to achieve its annual housing target in seven out of the first ten years of the plan (as set out in Appendix C and the housing trajectory) and that cumulatively, therefore, it will under-provide when compared against the annual average targets. Paragraph 47 of the Framework requires local plans to identify deliverable sites for the first five years, and developable sites to the remainder of the plan period. If the plan is unable to identify a sufficiency of sites for the first five years to underpin delivery of the plan's housing objectives then I suspect there is a significant risk of it being found unsound. In view of all the other challenges confronting the house building industry (finance, mortgage lending), failing to identify a sufficiency of sites will only add further difficulties and delay. This will have a very detrimental effect on the economy of the Medway Towns – and not just for the house building industry.

It is my view that unless substantial amendments are made to the Core Strategy, through the identification and allocation of additional deliverable and developable sites, housing delivery will be impaired and the local economy will suffer. The Council will also, in all probability, be confronted by the scenario of 'planning by appeal'. This is the opposite of what the new version of the plan-led system is seeking to achieve quite apart from being costly and generally unproductive for all concerned.

It is my understanding based on our conversation that landowners and developers are looking to promote land for development at the forthcoming examination. Judging by the information that you have provided for me and my reading of the core strategy, I am very concerned that the Council appears to rely upon sites that have failed to be delivered in the past and on others where there is uncertainty about the lead-in time and their viability. Instead, a range of new sites is needed as a matter of urgency. Hopefully, this will take place as a result of the forthcoming examination when the Inspector and participants will be able to scrutinise the composition of the land supply. The HBF hopes that the Inspector will recognise the inadequacies of the submitted Core Strategy – as did her predecessor – and propose amendments that will rectify the inadequacy of the Council's proposals for both housing and economic development.

Yours sincerely

**James Stevens**  
**Strategic Planner**

## **Promotion of land at Bakersfield, Station Road, Rainham**

### **Further submissions for Examination in Public of the Medway Core Strategy**

1. The Core Strategy significantly under-provides for new housing in the Rainham area during the plan period. In 2008, the population of the Rainham area was 40,989 (source CS Area Profiles 13, 14, 15 & 16).
2. Submissions have already been made in respect of the recognition of the potential of this 2.72 Ha site in Rainham to contribute towards the Council's housing supply in the CS period.
3. The CS anticipates that only 94 new dwellings will be provided in Rainham in the plan period (Table 10.13). This compares unfavourably to every other sub-area within Medway. All the capacity is said to come from "other sites". On closer scrutiny of the figures, it is immediately apparent that the capacity is limited to the first few years of the Core Strategy period, with Rainham not being anticipated to offer any further capacity for new housing after 2017. This is unrealistic and unsustainable and detrimental to the future economic growth of this town.
4. The sites which provide the capacity of 94 are all identified for delivery before 2017 (on the basis of Table 1 of the SLAA, January 2012 update). The sites are as follows:
  - a. Granary Road (site ref 0187) offers 7 x 3 bed houses and is expect to be developed by 2017;
  - b. Police Station (site ref 0456) offers 22 flats before 2017;
  - c. Pump Lane (site ref 0478) is identified to offer 19 dwellings in 2012-2017 but will in fact be completed in July 2012. The site has permission for 37 dwellings (26 private and 11 affordable). The affordable dwellings have been constructed for a housing association. 9 of the private dwellings have been constructed and sold to date (and should therefore be excluded from the SLAA);

- d. Station Road (site ref 0544) offers 5 flats and benefits from planning permission;
  - e. Samson Place (site ref 0793) offers 35 private dwellings. 7 have been built and occupied and therefore cannot count towards future supply. Most of the remainder have been reserved with construction due to be completed in May 2013;
  - f. Queens Court (site ref 0808) has consent for 32 units. Permission was refused in January 2012 for 40 units (i.e. a net increase of 8). The site can therefore only offer 8 at the most units in the plan period.
5. In fact, it is likely that much of the identified capacity will be taken up within the next 2 years. That means that in the later stages of the plan period, the Council has identified no new housing provision in Rainham. Rainham is currently a relatively vibrant town, and a popular place to live for families. Its future vitality will be inhibited if the CS endorses an overly restrictive approach to development.
6. The justification for low housing numbers at paragraph 10.63 of the CS is that the area is built up with little previously developed land. However, that justification ignores the need to identify land to meet the housing needs of the local population. The number of affordable houses that will be delivered for the Rainham area will be extremely low too with sites of 15 units or less (or larger than 0.5 hectares) yielding none (policy CS14). This is unsustainable and contrary to the intent of national policy.
7. The Bakersfield site (SLAA reference 0775) is a suitable site for new family housing in Rainham. As noted in the previous submission, it “fails” the proximity test simply because of the consolidation of local GP practices away from the site. It is within 800m easy flat walking distance of the mainline rail station and is directly on a bus route. Via Finwell Road, Bakersfield is 650 metre walking distance of Riverside Primary School and Nursery, and a shorter walking distance to convenience shops in Station Road.

8. The only other purported reason for excluding the site in the SLAA was that it is “Greenfield”. The site has housing to the immediate north and south and therefore there is no sensible landscape objection to its development. The CS does not propose any additional landscape protection washing over the site. Further, it is at least partly previously developed, there having been a tram line over the site and the site having been used for the extraction of brickearth. The result of the latter operations is that no top soil remains and the agricultural value of the land is vastly diminished to the extent that none of the site is Grade 1 agricultural land; no more than 10% of the site can be considered Grade 2 agricultural land; and no more than 35% grade 3A. The most recent assessment (in 2009) concluded that climate change may result in the need to downgrade the classification of the land. It is in any event outside the “fruit belt” identified in the CS.
9. The CS requires an annual housing supply of 815 houses for the plan period. Appendix C of the Submission CS identifies a consistent cumulative deficit for the 5 year period 06/07 to 10/11. Indeed the cumulative deficit continues for the following 5 years. Paragraph 47 of the NPPF requires a 20% buffer in circumstances of persistent under delivery, not a 5% buffer. The CS as drafted therefore fails to meet the national policy requirement in terms of housing land supply. This concern is expressed and shared by the Home Builders Federation in the attached letter. In any event, it appears from the North Kent SHMA (February 2012) that the 815 figure itself may in fact represent a shortfall (that document appears to identify a need for 878 dwellings per annum). In both cases, it is clear that the CS underprovides for housing, and that point is particularly stark in Rainham.
10. Bakersfield has considerable potential to meet the housing needs of Rainham beyond the current supply, which is likely to be exhausted within 2 years. The site is immediately available for development. The justification advanced for Rainham making such an insignificant contribution to the Council’s housing land supply does not, upon proper scrutiny, apply to this site. The CS should not endorse an overly restrictive approach and unrealistic approach to new housing provision in Rainham. This site is not subject to any further restriction

in the CS (in terms of landscape or other designation) and therefore its potential should be recognised.

11. Policy CS30 must include “Provision of at least 100 newly identified houses in a sustainable location, preferably on brownfield land and not in the Fruit Belt, to maintain the vitality and the viability of Rainham micro economy and which offers the otherwise absent provision of affordable housing.”
12. As additional bullet point for Policy CS13, “a site in Rainham of 100+ houses to ensure delivery of private as well as affordable housing”.