

STATEMENT OF COMMON GROUND

Introduction

At the Hearing into the Medway Council's Core Strategy, the Inspector requested that a Statement of Common Ground (SCG) covering housing-related statistics be prepared and submitted. This request was made due to the considerable number of figures, from various sources, being quoted during the Hearing. Paul Cronk (Senior Planner - Policy) of Medway Council, and Peter Court (Director, Peter Court Associates) on behalf of McCulloch Homes, were nominated to undertake this work.

In order to summarise the position of each of the parties, and to assist the Inspector in her decision-making, the following information sets out the key points on where the parties agree, and also where they agree to disagree.

The time-period of the Core Strategy

The Core Strategy covers the period 2006-2028.

Housing provision in the Core Strategy

The Council's housing provision is for 815 dwellings per annum (dpa) throughout the period of the Plan. This figure fully accords with the requirement set out in the South East Plan.

McCulloch Homes submitted that the housing provision should instead be 878 dpa (see Figure 110), since this figure had been identified in the North Kent Strategic Housing Market Assessment (February 2010).

Provision to date

There is no dispute between the parties over the actual housing completions during the first five years of the Plan period, which are as follow.

2006/07	591
2007/08	761
2008/09	914
2009/10	972
2010/11	657

Total 3895

Source : Core Strategy, Appendix C and AMR, December 2011, page 91.

The Council has since stated that the housing completion figure for 2011/12 is 809 dwellings.

Future Provision

The Council's Housing Trajectory of provision for the whole of the Plan period is also set out in Appendix C of the Core Strategy.

Both parties acknowledge that the trajectory shows that there will be a cumulative deficit in provision during the first ten years of the plan period (to 2016), but that a surplus is shown thereafter.

Forecasts of Housing Provision

The Council has produced Annual Monitoring Reports setting out, inter alia, forecasts of future housing provision. Those covering the early years of the plan period are as set out below.

Year.	AMRs : 2005 .	2006.	2007 .	2008	2009	2010.	Actual completions.
2006/7	954	630					591
2007/8	1497	916	647				761
2008/9	1337	1448	1031	1182			914
2009/10	1125	1156	1433	1048	1000		972
2010/11		870	1130	1543	577	591	657

Buffer provision

The NPPF now requires local authorities to provide either a 5% buffer against their 5 year housing land requirement or, where there has been a record of persistent under-delivery, a 20% buffer (NPPF, para 47).

There is no guidance in the NPPF as to over what period a judgment should be made as to whether a 5% or 20% buffer should be provided.

It is the view of McCulloch Homes that consideration should be given to a period sufficiently long so as to allow for fluctuations in the housing market and the economy, due to the cyclical nature of these. In this respect it was pointed out that, since 1991/2, provision of 815 dwellings has been achieved on just three occasions, in 1991/2; in 2008/9 and in 2009/10. The provision of 878 dwellings has, therefore, been achieved just twice. A buffer of 20% is, therefore, appropriate.

Whereas the Council would point out that the 815 dpa housing requirement figure is only recent and, therefore, wasn't applicable over the longer-term time period. The figure of 815 dpa has been exceeded twice in the six years of the plan period and that in this period it

has achieved 96% of its requirement. The Council considers that the buffer should therefore be only 5%.

A table of annual completions since 1981 is attached. The Council points out that there are in some instances slight discrepancies as Medway's AMR's contain the final annual completion figures, whereas the Kent County Council derived figures are sometimes provisional estimates.

The 5 year supply requirement

The Council considers that its five-year requirement should be 815×5 (4,075) less actual completions of 3,895). It also accepts that there is currently an under-provision from 2006-2011, namely 180 dwellings, which will need to be rectified. However, the Council points out that the latest AMR shows that of the 6,929 dwellings on large sites with planning permission, it has only phased 2,838 to come forward within the first 5-years.

McCulloch Homes accepts the methodology, but believes that this should be based on an annual requirement of 878 dpa. In these circumstances, the requirement is $878 \times 5 + 180$, totalling 4,570. The Council considers that the SHMA figure of 878 dpa is inappropriate as it covers a different time period (2001-2026) to that for the Core Strategy or the South East Plan. During the early part of which, different overall housing requirement figures were applicable.

Table 1

Kent: Dwelling Completions (net) all sites

Source: KCC Housing Information Audit

	Ashford	Canterbury	Dartford	Dover	Gravesham	Maidstone	Medway	Sevenoaks	Shepway	Swale	Thanet	Tonbridge & Malling	Tunbridge Wells	Kent and Medway	KCC area	1 year % change
All sites																
1981/82	574	381	78	143	56	354	561	80	155	150	93	414	284	3,323	2,762	
1982/83	728	636	100	304	309	839	748	378	375	213	497	570	258	5,955	5,207	
1983/84	385	574	202	359	211	289	869	183	456	295	320	677	269	5,089	4,220	
1984/85	538	904	287	413	372	541	1108	764	587	656	320	559	676	7,725	6,617	
1985/86	415	572	313	337	335	595	956	623	404	540	434	502	349	6,375	5,419	
1986/87	349	704	165	337	351	1247	1041	505	572	859	720	750	235	7,835	6,794	
1987/88	297	430	198	173	46	591	754	370	408	911	357	645	387	5,567	4,813	
1988/89	1125	1000	714	896	514	1719	1906	251	1316	1129	642	507	761	12,480	10,574	
1989/90	510	562	493	473	491	499	1330	501	485	597	474	510	886	7,811	6,481	
1990/91	479	142	304	443	62	376	377	188	145	341	856	323	255	4,291	3,914	
1991/92	374	510	1042	546	111	339	825	294	239	439	400	317	406	5,842	5,017	28.18 1991/01
1992/93	286	205	344	325	182	333	769	130	727	407	594	371	191	4,864	4,095	-18.38 Kent
1993/94	318	314	390	301	227	336	669	227	292	432	495	347	182	4,530	3,861	-5.71 S Plan
1994/95	760	506	418	284	185	599	562	142	321	308	327	495	382	5,289	4,727	22.43
1995/96	579	383	221	363	178	401	628	231	305	511	234	450	292	4,776	4,148	-12.25
1996/97	396	521	246	222	59	398	609	477	278	293	244	304	311	4,357	3,749	-9.62
1997/98	467	489	556	204	95	444	702	439	281	321	366	417	317	5,098	4,396	17.26
1998/99	707	610	368	276	103	262	698	-14	486	705	268	414	308	5,191	4,493	2.21
1999/00	725	540	182	212	81	755	719	285	513	576	286	346	274	5,494	4,775	6.28
2000/01	941	615	86	23	61	416	678	183	354	654	297	273	247	4,828	4,150	-13.09
2001/02	753	501	322	459	137	722	603	199	410	659	367	337	222	5,691	5,088	22.60 2001/16
2002/03	726	305	646	177	137	444	676	143	400	568	334	589	376	5,521	4,845	-4.78 KMSP
2003/04	910	377	622	284	209	381	735	186	369	570	416	378	331	5,768	5,033	3.88 S Plan
2004/05	962	775	625	329	464	816	646	224	376	375	441	977	377	7,387	6,741	33.94
2005/06	590	532	184	434	274	758	530	468	753	854	365	734	259	6,735	6,205	-7.95
2006/07	359	638	659	327	305	714	591	141	146	835	651	850	515	6,731	6,140	-1.05 2006/07
2007/08	566	1284	603	342	235	992	761	261	402	767	606	839	517	8,175	7,414	20.75 SE Plan
2008/09	536	965	610	269	436	441	914	290	562	494	726	889	411	7,543	6,629	-10.59
2009/10	501	305	152	262	187	581	972	213	180	709	520	372	104	5,058	4,086	-38.36
2010/11	555	361	362	201	185	649	657	281	132	433	889	351	315	5,371	4,714	15.37
Annual Averages to 2010/11																
5yr ave	503	711	477	280	270	675	779	237	284	648	678	660	372	6,576	5,797	