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Our Ref:JAC/SG/9211/7828

20th March 2013

For the attention of Mrs Laura Graham
Inspector for the Medway Local Development
Framework Examination

Dear Ms.Graham

RE: REVOCATION OF THE SOUTH EAST PLAN: IMPLICATIONS FOR THE DRAFT CORE STRATEGY

I refer to your letter of the 7th March 2013 and wish to make representations in respect of the former revocation of the Regional Strategy for the South East which as you are aware will come into force on the 25th March 2013.

Our submissions are made on behalf of Mr David Ferrett, and Sounding Board Properties.

In short it is our view that it is essential that the Medway Core Strategy re-assesses real housing need.

The Framework states that (Paragraph 47 refers) to boost significantly the supply of housing, Local Planning Authority's should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively access needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.

It is evident that the Core Strategy at present only identifies an overall housing target of 815 dwellings per annum up to 2028.

Consideration of the North Kent Strategic housing Market Assessment 2009 shows an identified housing need of some 878 dwellings per annum. This is clearly a very significant difference and as a starting point therefore it can be expected that the current figure in the Draft Core Strategy will not be found to be sound. Moreover it is notable that the figures upon which the assessments for the current Core Strategy are based is now somewhat out of date. Indeed the North Kent SHMA was undertaken in 2009 and published on the 3rd February 2010. As a consequence it pre-dates the 2011 Census and cannot therefore be considered to meet objectively assessed needs.

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It is therefore clear that even on a quick assessment the Core Strategy could not be found sound on the basis of housing numbers as objectively assessed needs are not shown to be met.

Beyond this there is then the fact that there are major question marks over the significant allocation at Lodge Hill. In the absence of such an allocation it is clear that there will need to be a fresh look at housing sites across Medway Council's administrative area.

With a likely re-distribution of housing sites in the new Draft Local Plan, it will be necessary to also consider the location of employment sites, services, and general infrastructure. If that is to take place, all other parts of the Core Strategy will also need to be subject to review and the plan as it stands at present could be found sound in such circumstances.

This to an extent an over simplification of the position but I would welcome the opportunity to attend the next sessions, in particular one discussing the issue of revocation of the South East Plan.

Yours sincerely

A handwritten signature in black ink, which appears to read 'John Collins'. The signature is written in a cursive style with a large initial 'J'.

John Collins