

LOCAL DEVELOPMENT FRAMEWORK EXAMINATION MEDWAY COUNCIL

Date: 18 April 2013

Mr Brian McCutcheon
Planning Policy & Design Manager
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

Dear Mr McCutcheon

Re: Revocation of the South East Plan and new household projections

I note the conclusion in your statement dated 20 March that the impending revocation of the South East Plan (SEP) has been fully anticipated and reflected in the Core Strategy. Although the likelihood of revocation was discussed at the hearings in 2012, the actual revocation of the SEP removes the requirement for the Plan to be in conformity with the SEP. This constitutes a significant change in circumstances which, with specific reference to housing, implies that even greater weight should be attached to meeting the full, objectively assessed needs for market and affordable housing in the housing market area required by the National Planning Policy Framework (the Framework). Paragraphs 3.13 – 3.15 of the Plan indicates that the proposed annual requirement of 815 dwellings per annum will be carried forward from the SEP because 'a higher figure is unlikely to be deliverable and a lower figure would not meet the future levels of need in Medway.....'. The North Kent Strategic Housing Market Assessment (SHMA) 2010 suggests that the annual housing requirement for Medway 2008 – 2026 is 878 dwellings which is significantly higher than the SEP target. However, it is not entirely clear to me whether or not this figure reflects the Framework requirement (paragraph 47) to identify the full, objectively assessed needs for market and affordable housing and the requirement (paragraph 50) to 'plan for a mix of housing based on current and future demographic trends.....'.

The SHMA is based on Kent County Council household (2008) projections. As I am sure you will be aware, the latest national statistics on the projected number of households in England and its local authority districts to 2021 were published on 9 April 2013. The main points are summarised in the link below along with the detailed report:

[https://www.gov.uk/government/publications/household-interim-projections-2011-to-2021-in-england.](https://www.gov.uk/government/publications/household-interim-projections-2011-to-2021-in-england)

**Gun Wharf, Dock Road,
Chatham, Kent, ME4 4TR
Tel: 01634 333880 Fax: 01634 332862
Adam Waters, Programme Officer
ldfprogrammeofficer@medway.gov.uk**

LOCAL DEVELOPMENT FRAMEWORK EXAMINATION MEDWAY COUNCIL

The “Choice of Assumptions in Forecasting Housing Requirements” available via <http://www.howmanyhomes.org>. advises that LPAs should use official projections. Although this website does not have the status of official guidance it has been prepared by and has the support of a range of practitioners. On the face of it, the figure for housing need derived from the SHMA appears to be out of date and may not fully reflect the requirements of the Framework or current good practice guidance.

In the circumstances I consider that you need to carry out an appraisal of whether the strategy for the provision of new housing in the submission draft Core Strategy is fully compliant with the requirements of the Framework. As a first step you will need to determine what the full, objectively assessed needs are for market and affordable housing. Bearing in mind the Framework’s reference to determining this across the housing market area (HMA) you will need to work with the other authorities in the HMA (although I note there is some ambiguity about what the relevant HMA is). Once the outcome of this work is known you will need to consider whether it requires a revised/amended strategy. In any event, I consider that you will need to draft main modifications to the Plan to reflect the revocation of the SEP and to demonstrate that the Plan accords with the Framework.

I would also like to take this opportunity to ask what progress has been made in relation to my request (23 January 2013) that you draft modifications relating to gypsy and traveller policy.

I look forward to your response,

Laura Graham

Inspector

**Gun Wharf, Dock Road,
Chatham, Kent, ME4 4TR
Tel: 01634 333880 Fax: 01634 332862
Adam Waters, Programme Officer
ldfprogrammeofficer@medway.gov.uk**