

LOCAL DEVELOPMENT FRAMEWORK EXAMINATION MEDWAY COUNCIL

Date: 21 May 2013

Mr Brian McCutcheon
Planning Policy & Design Manager
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Dear Mr McCutcheon

Thank you for your letter of 3 May 2013. Inspectors examining development plans have consistently taken the view that the revocation of the Regional Strategies represents a significant change in circumstances. I note your reference to Annex D of the Planning Inspectorate's advice on the Framework, which lists key changes highlighted by the DCLG Impact Assessment. The text of the Assessment refers to levels of housing need and the perceived problems with a top-down approach, driven by Regional Spatial Strategies and states that: *At the forefront of local policies will be a requirement to assess and plan to meet the full range of current and future needs and demands in the context of the presumption in favour of sustainable development.* It would be difficult, in my view, to sustain an argument that the revocation of Regional Strategies and the publication of the Framework was not intended to be a significant change in government policy.

The Core Strategy, as currently drafted, understandably places considerable emphasis on conformity with the SEP, which is no longer a test of soundness and carries no weight in that regard. My comment regarding 'even greater weight' was intended to apply to the provisions of the Framework, as compared with the SEP. It was not intended to suggest that greater weight should be given to any one part of the Framework, than any other. It may be that the housing requirements set out in the SEP equate to the full, objectively assessed needs as required by the Framework. The difficulty I am faced with is that neither the Plan, nor the evidence base, provides a coherent explanation of how the SEP target reflects (or not) the full, objectively assessed needs. Your letter states in the last paragraph that the 'full, objectively assessed needs for market and affordable housing are set out in the 2010 North Kent SHMA', which you say has been produced in accordance with relevant guidance. However, earlier in the letter you identify what you consider to be a flaw in the methodology used (the double-counting point), although the SHMA itself does not, as far as I can see, explain this point. The paragraph to which you refer (6.79) deals with the backlog in 2001, not 2001 – 2006, which is where you say double-counting has occurred.

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Furthermore, it's not clear that a SHMA produced in accordance with the current guidance meets the NPPF requirements. For other purposes, I was recently reading the Birmingham Strategic Housing Market Assessment 2012 produced by Roger Tym and Partners. The introduction to the study explains the methodology and (paragraph 1.5) identifies that the Practice Guidance on SHMAs has not been revised to align with the new planning system. Paragraph 1.6 identifies the elements that a 'new' SHMA should address.

As stated in my previous letter, the Howmanyhomes.org toolkit has no official status. It has, however, been developed by a group of practitioners (including local authorities). Its use is not mandatory, but it does offer a consistent approach which has widespread support.

It is perhaps an unfortunate factor, but it is far from unusual, that changing circumstances have to be taken into account in the process of preparing a development plan, and during the examination process. Now that the Framework has been in place for over a year and the SEP has been revoked, I do not consider that the plan, as currently drafted, with its reliance on meeting SEP targets, could be found sound without a robust explanation of how the SEP figure relates to full, objectively assessed need. As far as I am aware, all other authorities with ongoing examinations relating to Local Plan strategies have been asked to consider the implications of latest household projections, albeit that they run only to 2021. If the projections suggest a lower growth in households, as is apparently the case for a number of authorities, the implications of that need to be considered.

In summary, I remain of the view that, following the revocation of the SEP, 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.

Laura Graham

Inspector

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