



## Representations of Barratt Strategic

### Medway Council ref 04

#### Medway Council's Core Strategy – Examination in Public – response to the issues raised by the Inspector

##### **Matter 1 – The legal process and requirements**

- 1.1 Barratt Strategic only wish to comment on (e) – Is the CS in compliance with the RSS - the SEP.
- 1.2 In their previous reps Barratt Strategic questioned the need for the plan to merely look to replicate the SEP housing requirement. This was because the evidence base for the SEP is relatively old and subsequent studies in particular The North Kent SHMA (2009) indicated a need to accommodate a greater level of growth than that proposed in the SEP.
- 1.3 The NPPF has been adopted since Medway Council submitted their CS for examination. Paragraph 158 of the NPPF makes it clear that:-  
'Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.'
- 1.4 Paragraph 159 continues:-  
'Local planning authorities should have a clear understanding of housing needs in their area. They should:
  - prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
    - meets household and population projections, taking account of migration and demographic change;
    - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
    - caters for housing demand and the scale of housing supply necessary to meet this demand;
  - prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.'
- 1.5 Having regard to the above we believe a plan that only looks to accommodate 815dpa (17,930 over the plan period (2006-2028)) does not meet the housing requirements of the area which has been identified as 878 dpa (19,316 over the plan period) in the North Kent SHMA. The resultant shortfall (1,386 dwellings) is not insignificant, and in an area of growth, where the shortfall in

affordable housing is identified as a key sustainability issue under providing is in our opinion unjustified when there are alternative sustainable sites being promoted that could help address this situation. The CS has not therefore been positively prepared, is not justified or effective.