

Medway Core Strategy

Representations by Medway Magna Ltd

Matter 3 - Housing Supply and Location

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1: Introduction

- 1.1 Medway Magna have participated in all stages of the consultation process associated with the Medway Core Strategy. The Inspector will know that a previous attempt to produce a strategy failed and it was withdrawn in September 2007.
- 1.2 The Draft Core Strategy (DCS) as now proposed is identical in its provisions and shortcomings as the previous document. The DCS proposes a housing strategy that focuses almost exclusively on regeneration sites (a strategy that for the last 25 years has failed) and is not supported by the evidence base upon which it purports to rely.
- 1.3 The principal objection that Medway Magna raise in respect of the DCS housing strategy is that there is every indication that the locations proposed will not deliver the required number of dwellings in the Plan period.
- 1.4 This written submission should be read in conjunction with the submission by Medway Magna in respect of Matter 2 - Spatial Vision.

2: Housing Policy

- 2.1 The National Planning Policy Framework (NPPF), at paragraph 47, asks Local Planning Authorities (LPAs) to use their evidence base to boost significantly the supply of housing and to ensure that their Plan meets the full objectively assessed needs for market and affordable housing. The second bullet point in the paragraph requires LPAs to identify and update annually a supply of specific and deliverable sites, sufficient to provide five years worth of housing against their housing requirements.
- 2.2 One problem with the DCS is that none of the sites in the council's Strategic Land Availability Assessment (SLAA) have been tested to ascertain whether or not they are truly deliverable. While paragraph 1.3. of the DCS states that Medway has a healthy supply of housing sites, there is no accompanying document that informs the DCS on their deliverability.
- 2.3 This response (below) suggests that a simple table is produced that recasts the information in paragraph 3.8 of the State of Medway Housing Report to give greater clarity on the policy source, status and location of the relied on sources of housing supply. Only when this is done will it be clear whether the DCS is consistent or not with paragraph 47 of the NPPF.
- 2.4 The annual level of housing provision aimed for is 815 and the DCS, at paragraph 3.15, states that this will be challenging. The key components of housing supply are stated to be the large waterfront regeneration sites (a failed policy) and Lodge Hill (doubtful delivery).
- 2.5 It is surprising to find therefore, the Housing Trajectory showing dwelling completions for 2015/16 - 17/18, running at an average of 1173 dpa.

2.6 The DCS states at paragraph 5.7, that housing delivery will continue with the heavy emphasis on regeneration sites and as a consequence unnecessary greenfield developments will not be allowed. This approach is flawed, for two reasons. Firstly, there has not been a heavy emphasis on housing provision from previously developed land, the split between pdl and greenfield sites has been about 50/50 for the last 4 - 5 years (see below).

2.7 Secondly, it is quite clear from the evidence of recent performance, that greenfield sites will continue to be required and that the stance of the DCS as stated in paragraph 5.7 is contrary to the presumption in favour of sustainable development, set out in the NPPF (para 14).

2.8 To assist LPAs in incorporating the presumption in favour and regarded as a golden thread running through both plan making and decision taking, the Planning Inspectorate have helpfully provided a model policy that gives effect to embracing, in plans, the presumption requirement in the NPPF. It reads as follows:

“When considering development proposals, the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which means that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the council will grant permission unless material considerations indicate otherwise - taking into account whether:

- **Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
- **Specific policies in that Framework indicate that development should be restricted.”**

2.9 Failure to embrace and give effect to the presumption in favour of sustainable development renders the DCS inconsistent with National Policy and therefore unsound.

3: Supply, Location and Deliverability

- 3.1 The DCS relies on a mishmash of source documents that supposedly illustrate that it can rely on, in the words of paragraph 5.1, an “abundant supply” of brownfield land to exploit, to secure housing delivery and that all in all, the sources of supply result in a potential surplus of 2,988 dwelling for the Plan period (para 3.9 State of Medway Report: Housing, updated January 2012).
- 3.2 Paragraph 3.8 of this document is confusing. For example 396 dwellings are to come from Medway Local Plan 2003 Allocations. However, Rochester Riverside, a Local Plan allocation and site no 0515 in the SLAA, is listed as contributing 2,000 dwellings and has planning permission. So far as para 3.8 in the State of Medway Reports is concerned is RR’s contribution confined to the SLAA source or is it included in the 6,926 site with planning permission, or is it included in both?
- 3.3 Prior to the Examination, it would be helpful to have a Table that lists the 6,926 large sites and the 9416 SLAA sites (which includes Lodge Hill), upon which the council rely to deliver the housing component of the Core Strategy. While the DCS is not a document to examine individual sites, it is necessary to assess the potential delivery from the principal sites to ensure the DCS is effective. This is important because the DCS states at paragraph 5.7, Medway Council will continue a housing delivery strategy that places a heavy emphasis on regeneration.
- 3.4 The Spatial Strategy Background Paper 2012, lists a number of sites, at paragraph 3.2. Some of these appear to be the subject of Development Briefs and presumably contribute to the 9,416 SLAA sites.

3.5 The heavy emphasis on previously developed land, referred to at paragraph 5.7 of the DCS, is misleading, when reference is had to the following Table 2 from the 2011 Annual Monitoring Report Vol 1.

Year	Percent units on PDL	Units on PDL
2006/07	91%	538
2007/08	37%	408
2008/09	51%	524
2009/10	63%	622
2010/11	49%	322

3.6 The Table shows that the number of dwellings built on previously developed land over the five years to 2010/11, has been 58%. The figure for 2009/10 was 49%. This hardly indicates a “heavy emphasis” on previously developed land. For the last four years, greenfield sites have on average contributed about 50% of housing delivery.

3.7 The Annual Monitoring Report goes on to say that with greenfield sites being built out and the number of regeneration sites such as Rochester Riverside becoming available (it has been available for 10 years), it is expected that the figure will exceed 60% in future years.

3.8 The only greenfield site of any size, contemplated by the DCS, is at Lodge Hill, though the greenfield/pdl split is unclear. It is important therefore to consider how many dwellings will come forward from regeneration sites, particularly in the next five years.

- 3.9 Given that Lodge Hill will make little or no contribution over the five year period (see Medway Magna submission on Core Vision), it is unlikely that anything like 815 dwellings will be completed annually up to 2017. If no significant greenfield sites become available, the actual figure could be around half of what is required.
- 3.10 This simple analysis demonstrates that an over reliance on regeneration sites leaves the DCS dangerously exposed in terms of housing delivery, which impacts on the whole strategy set out in paragraph 5.1 of the DCS. The figures in the Housing Trajectory, of 1,369 dpa in 2016/17 onwards to 2020/22, look wholly unrealistic.
- 3.11 A particular problem with regeneration sites is viability. Information obtained under the Freedom of Information Act shows overall costs associated with Rochester Riverside, in respect of land acquisition by compulsory purchase and private treaty, remediation and site preparation and servicing, to be in the order of £85.5m . Pre-recession, the number of dwellings proposed on the site was increased from 450 to 2,000 but still without any final disposal to a developer.
- 3.12 It is essential therefore that the Model Policy, in respect of giving effect to the presumption in favour of development is included in a revised Core Strategy so that decisions can be taken having regard to that policy, on potential development sites that come forward for development.

4: Conclusions

- 4.1 The Regeneration Strategy that has failed in the past and is heavily relied on for future development will not deliver the requisite level of housing.
- 4.2 It is unclear just what status and what potential regeneration sites from various source documents will contribute to housing provision. The locations therefore, (including Lodge Hill), are not the most appropriate and need to be augmented by greenfield sites adjacent to the urban area.
- 4.3 This is necessary because it is clear from the council's own evidence base that identified sites (and these need to be listed), have no reasonable prospect of coming forward to meet the identified dwelling requirement in the necessary time frame.

