



Medway Core Strategy Plan Public Examination 2012

Matter 3: Housing Supply and Location

**HEARING SESSION:
13th JUNE 2012 (AM)**

**STATEMENT BY
MEDWAY COUNCIL**



Matter 3: Housing Supply and Location

Matter 3a: Will the strategy deliver the number of new homes required to meet the RS requirements/identified needs?

1. As indicated in the background papers LD03 – Deliverability of the Core Strategy and LD04 – The Basis for Housing and Employment Growth Targets, the proposed scale of housing development is considered to represent the best balance between identified needs and deliverability.
2. The deliverability paper points out that the already identified pipeline incorporates a sensible buffer and the strategy imposes no artificial ceiling or phasing restrictions that might affect delivery. There is therefore considerable inherent flexibility in the strategy.
3. The current economic downturn is an undoubted challenge to deliverability but, as the following tables show, progress to date is quite exceptional given the prevailing economic conditions. Performance relative to other areas demonstrates this quite clearly.
4. It should be noted that table 1 includes provisional figures for 2011/12 but table 2 does not as data is not yet available for the other areas.

Table 1: Completions against target – last 6 years

Year	2006/7	2007/8	2008/9	1009/10	2010/11	2011/12	Total
Target	815	815	815	815	815	815	4,890
Net Completions	591	761**	914	972	657	809*	4,704
Surplus/Deficit	-224	-54	-1	+157	-158	-6	-286
Units U/C	794	1,321	983	585	807	502*	

* Mature estimate subject to final checking

** Gross completions offset by demolition of flat block at Carpeaux Close, Chatham: 63 units not yet replaced

Table 2: Medway’s Relative Performance – 2006 - 2011

Authority	Chelmsford	Ashford	Milton Keynes	Medway
Target	3,500	3,405	8,750	4,075
Completions	2,348	1,592	8,510	3,895
% Performance	67%	47%	97%	96%

5. The key points are:
 - Annual production rates inevitably fluctuate but there is no underlying trend pointing to a downturn in production in Medway

- Although the number of units under construction is lower for 2011/12 it is known that some significant sites started after the formal survey and the affordable housing programme for 2012/13 currently stands at around 300 units, which is above the 25% target
 - On the available evidence Medway is very successfully bucking a national trend that has seen continuing declines in housing completions.
6. It is, of course, impossible to be certain as to what will happen over the next few years but the range of sites and market choice should actually improve as Lodge Hill comes on stream from 2014.
7. It is therefore the Council's considered view that the available evidence strongly suggests that the strategy will deliver the number of new homes required to meet local needs and the South East Plan based target.

Matter 3b: Are the locations identified for the supply of new housing the most appropriate when considered against all reasonable alternatives?

8. The Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA) tested all reasonable alternative strategic distribution options (Evidence Base document MC07). The Core Strategy Issues and Options Report (July 2009) considered the potential of 5 broad locations to accommodate growth outside of the existing urban boundaries.
9. These spatial alternatives were:
- Option 1: New settlement at Lodge Hill, Chattenden
 - Option 2: Expanded Hoo
 - Option 3: Capstone Urban Extension
 - Option 4: East of Rainham Urban Extension
 - Option 5: North of Rainham Urban Extension
10. The Sustainability Appraisal concluded that the new settlement at Lodge Hill, Chattenden would be the most sustainable of the 5 options as it would make the greatest contribution to sustainability in the long-term (it being a predominately brownfield site). Furthermore, no substantive evidence has been produced by any third party in respect of any of the other 4 options (or parts thereof) to demonstrate that they would be capable of delivering an equivalent quantum of development to that which will be secured by the Lodge Hill allocation.
11. Lodge Hill is the only strategic housing allocation being proposed within the Core Strategy. Much of the remaining housing requirement will be delivered on the large waterfront urban regeneration sites that exist along the River Medway. The development of these, and other brownfield sites will maintain the Council's long-term commitment to

supporting regeneration and the objectives for the Thames Gateway. Further details of how this has been achieved are set out in a Background Paper (LD08).

12. Consequently, the Council firmly believes that its comprehensive evidence base and sustainability appraisal demonstrate that the locations identified for the supply of new housing are indeed the most appropriate when considered against all reasonable alternatives.

Matter 3c: Is there a reasonable prospect that the identified sites are deliverable/developable during the plan period, particularly those sites that have been carried forward from the local plan?

13. There are a number of evidence base documents and other considerations that relate to this.

Strategic Land Availability Assessment

14. The Medway Strategic Land Availability Assessment (SLAA) assesses the suitability, availability and deliverability of sites to meet Medway's requirement for residential, employment, retail and other uses for at least 15 years. The original SLAA Report was produced in November 2010 (EB82); this was updated in May 2011 (EB83) and more recently in January 2012 (EB84).
15. Against Medway's 5-year housing requirement of 4,075 dwellings (815 units x 5), the Housing Trajectory in the January 2012 SLAA Update identified a potential supply of 4,627 dwellings for 2012 to 2017, 5,929 for 2017 to 2022 and 3,617 for 2022 to 2027 (see Table 5). The deficit of 458 dwellings at the end of the third period will be offset by a cumulative surplus over the whole period of 1,948 dwellings. A further 508 units have been phased for 2027-2028, which should come forward within the life of the Core Strategy. Consequently, a supply buffer exists in excess of the 5% advocated in the NPPF.

Land Allocations and Development Management Policies DPD

16. Specific site allocations will be identified within the forthcoming Land Allocations and Development Management Policies DPD, substantive work upon which will be undertaken immediately after the adoption of the Core Strategy. Further information on the content of this document can be found in the 'Scope of Land Allocations DPD' Background Paper (LD06).

Local Plan Allocations

17. The Core Strategy makes provision for 10 sites allocated in the Adopted Medway Local Plan (2003) to be carried forward into the Core Strategy (see Appendix 1 for full details). Nine of these allocations

make provision for a total of 321 dwellings. In addition, a further site at Cross Street/The Brook, Chatham is an allocation for 26 dwellings. However, this site has now been enlarged and planning permission has been granted for 118 dwellings. Only this, together with two other allocations, with a combined capacity for 62 dwellings, feature in the current 5 years housing land supply. The other 7 Local Plan Allocations are not scheduled until the 2020's but can come forward earlier if circumstances allow.

18. A further 5 sites, with an estimated capacity for 68 dwellings, are not carried forward from the Local Plan into the Core Strategy.

Delivery Rates

19. This aspect is dealt with under Matter 3a above.

Annual Monitoring Report

20. Medway's Housing Trajectory is updated each year as part of the production of the Annual Monitoring Report (AMR) and sets out the number of units expected to be completed over the remainder of the plan period up to 2028. The trajectory is based on sites with planning consent or where there is a high degree of certainty that a site will come forward for development. Phasing is agreed by a round table of officers with the most up to date intelligence about individual sites.
21. The effectiveness of this process is demonstrated by the extremely good record there is in relation to the estimates, compared to subsequent actual completions. Over the period of 2006-2012 the total housing delivery rate was only 46 dwellings below the estimated delivery rate figure of 4,750 dwellings (see Appendix 2).

Matter 3d: Will the needs of gypsy and traveller communities and travelling showpeople be met by Policy CS16? Does the Policy comply with the National Planning Policy for Traveller Sites (March 2012), including the requirement to set pitch and plot targets and to identify a five-year supply of deliverable sites and developable sites or broad locations for the later years of the plan period?

22. Prior to publication of the NPPF and associated 'Planning Policy for Traveller Sites' the Council's intended approach to meeting the needs of Gypsies and Travellers and Travelling Showpeople was:
 - Provide an appropriate but overarching policy covering each category or group, incorporating criteria to guide subsequent work and to provide an objective basis for the determination of planning applications in the short term
 - Refresh the last GTAA pitch assessment and allocate specific sites in the forthcoming land allocations DPD

- Also consider, at that stage, whether further supporting policies were justified.
23. In the event the new national policy requires a modified response. Specifically:
- Not only must a 5 year supply be identified but also sites or broad locations that will meet needs over up to another 10 years (15 in total)
 - Needs assessments should, preferably, be carried out on a sub regional basis and serious consideration should be given to joint plans with partner authorities
 - Overall provision policies need to be supported by more detailed policies covering a range of issues set out in the policy document.
24. However it should also be noted that paragraph 10 states *“Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria based policies should be included to provide a basis for decisions in case applications nevertheless come forward.”*
25. On this basis the Council considers that a broad criteria based policy is still appropriate for core strategies and with more detailed policies and allocations being included in a separate DPD. This being the case it follows that Policy CS16 is still in conformity with national policy but the Council will need to reconsider how it undertakes and applies subsequent work.
26. To this end the Council has already commenced discussions with other Kent authorities to seek to agree a collaborative approach to needs assessments and their early preparation and consider the potential for a subject specific joint DPD. The next meeting to progress this takes place on 20th June.
27. The Council would take this opportunity to emphasise that the Core Strategy is intended to be a high level document. As such it provides a proper context for more detailed policies in other documents and for site allocations that need to be defined on a proposals map.
28. It therefore considers that Policy CS16 strikes the right balance – setting a strategic framework but also making clear that allocations are a matter for a subsequent DPD. It is also of the view that the 5 and 15-year pitch targets can and should be set in that later DPD. This will allow the most up to date information to be taken into account and provision made having regard to a broader geographical area in accordance with the new national policy.

APPENDIX 1: Local Plan Allocations

Allocated Local Plan sites carried forward in the Submission Draft Core Strategy (as listed in Table 5 3 of the Submission Core Strategy):

HLS Site Reference	Address	Comments	Number of dwellings	Estimated year of delivery (AMR 2010/11)
GL150	Amherst Hill, Brompton	2011 site sold to housebuilder and application expected June 2012	34	2015/16
GL181	Medway House, 277 Gillingham Road, Gillingham	Building currently under utilised and suitable for conversion	12	2025/26
ME254	Strood Riverside, Canal Road, Strood	Within Strood Riverside Development Brief area and now part of larger site	104	2021/23
ME342	Mercury Close, Borstal	Previous planning permission now lapsed	5	2021/22
ME375	Commissioners Road, Strood	Within Strood Riverside Development Brief area and as per ME254	100	2021/23
ME386	328-338 & 342-344 High Street Rochester	Within the Star Hill to Sun Pier THI area	15	2025/26
ME407	Grays Garage, High Street, Chatham	Recent enquires re redevelopment	28	2016/17
ME409	Former Laundry, Hilda Road, Chatham	Recent refusal. New application pending for 15 units	5	2021/22
ME410	Cooks Wharf, Off High Street, Rochester	Within the Star Hill to Sun Pier THI area	18	2025/26
Total			321	

Matter 3: Housing Supply and Location

<i>ME383</i>	<i>Cross Street and The Brook Chatham</i>	<i>Enlarged site now has planning consent for 118 dwellings</i>	<i>118 (allocated 26)</i>	<i>2015/17</i>
--------------	---	---	---------------------------	----------------

Allocated Sites in the Local Plan not carried forward into the Core Strategy:

HLS Site Reference	Address	Number of dwellings
GL152	East of Gillingham Golf Course, Gillingham	8
GL135	Borough Road, Gillingham	25
GL159	89 Ingram Road, Gillingham	5
ME004	West of Vixen Close, Lordswood	15
MC005	352-356 Luton Road, Chatham	15
		68

APPENDIX 2: Housing Estimates

Forecast Completions against Actual Completions:

	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2006/12 Total
Requirement	815	818	815	815	815	815	4898
Actual Completions	591	761	914	972	657	809 <i>(draft)</i>	4704
Previous Years Estimated Completions	630	647	1182	1000	591	700	4750
Difference between estimate and actual	-39	+114	-268	-28	+66	+109	-46

This information has been taken from the published Annual Monitoring Reports (AMRs), which can be found on the Councils website.