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**Regeneration and Policy**

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**Date:** 29 February 2016

Via email only to

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Dear Catherine,

Thank you for giving us this opportunity to comment on the Medway Local Plan Issues and Options Consultation. There are three specific issues upon which the Council wants to comment.

**Proportionate evidence**

As you are aware, the National Planning Policy Framework (NPPF) advises 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. The NPPF also advises that 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.

The Council values and appreciates Medway Council's approach to informed and evidence-led strategic planning and its provision of a comprehensive and up-to-date evidence base for housing, economy and retail, as provided by the Strategic Housing and Economic Needs Assessment (SHENA), which was jointly commissioned with this Council.

**Aim of the Local Plan**

Whilst the Consultation document states that the Council is embarking on the plan preparation process with the intention meeting its objectively assessed needs identified for its administrative area, it makes no reference to the needs of the wider housing market area. National Planning Practice Guidance on "Local Plans" advise that the "Local Plan should aim to meet the objectively assessed development and infrastructure needs of the area, including unmet needs of neighbouring areas where this is consistent with policies in the National Planning Policy Framework as a whole".

On 5 June, 2015, Gravesham Council wrote to Medway Council, to explain that due to the constraints of the Green Belt, it may not be possible to identify sufficient land in its boundaries to fully meet its objectively assessed housing need. It went on to state that the opportunity should now be taken to explore whether Medway could help to meet some of Gravesham's housing need and to enter preliminary discussions to this end. Medway agreed to begin discussions and a meeting has been arranged for mid-March 2016.

The document should more accurately state that Medway is embarking on the plan preparation process with the intention, together with Gravesham, of meeting the objectively assessed need

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identified for their joint housing market area. This would meet the Duty to Co-operate requirements, take a co-ordinated approach to housing provision and ensure that strategic issues are effectively addressed in plan preparation without committing the Council to meeting a specific housing number from the outset.

We have highlighted those parts of the consultation document related to this issue in an appendix to this letter.

### **All reasonable alternatives considered as part of Development Strategy**

The Council understand that the document is not a detailed plan, but rather seeks to engage local people, developers and wider stakeholders in assessing what are the best choices for a development strategy for Medway over the next 20 years. To ensure that this is effective, all reasonable alternatives should be considered as part of the development strategy options.

Paragraph 52 of the NPPF recognises that local planning authorities may plan for the supply of new homes through larger scale developments such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. In CLG's recent consultation on proposed changes to national planning policy, the Government is now proposing to strengthen this policy to provide a more supportive approach for new settlements. It considers that local planning authorities should take a proactive approach to planning for new settlements where they can meet sustainable development objectives, including taking account of the need to provide an adequate supply of new homes.

In considering its development strategy options, Medway Council recognises that it is expected to see a significant level of growth over the plan period that is likely to be amongst the highest seen. One of the options put forward for delivering this growth is the concept of freestanding settlements. Indeed, it states that in previous iterations of planning policy for Medway, the provision of a new settlement at Lodge Hill was central to the area's development strategy. This had a capacity of 5,000 dwellings and it remains an option, depending on the outcome of a public inquiry to be held later in 2016 / 2017.

The Council also considers that there may be scope for further freestanding settlements on the Hoo Peninsula as well as scope for smaller freestanding settlements, planned as "garden villages" to accommodate up to 2,000 houses. However, having embraced the concept of new settlements and garden villages, the report overlooks the possibility of larger scale garden cities.

The original Garden City concept envisages settlement of no more than 32,000 people, surrounded by farmland with further growth accommodated in other, linked but separate settlements. Given that the Council is considering the possibilities of new settlements ranging from 2,000 to 5,000 dwellings as well as the expansion of existing settlements on the Hoo Peninsula, there appears to be an opportunity to explore the concept of a Garden City with linked settlements.

In April, 2014, the Government invited local authorities to submit proposals for the development of Garden Cities at or above the 15,000 homes level. This roughly coincides with the original limit of 32,000 people referred to above. Furthermore, Ebbsfleet is being developed as a garden city with a capacity of up to 15,000 dwellings and options for development of a new settlement with this capacity could be explored in Medway.

Shelter's proposal to the Wolfson prize was for an initial 15,000 home settlement at Stoke Harbour and whilst we recognise that this isn't supported locally, it would appear to be a reasonable alternative for further consideration

[https://england.shelter.org.uk/data/assets/pdf\\_file/0006/840660/Wolfson\\_MMXIV\\_Garden\\_City\\_Shelter.pdf](https://england.shelter.org.uk/data/assets/pdf_file/0006/840660/Wolfson_MMXIV_Garden_City_Shelter.pdf)

Such an option might provide an opportunity for helping to meet some of need identified for the housing market area, potentially including a component of Gravesham's need.

The Council looks forward to ongoing duty to cooperate discussions at both officer and member level as Medway's Local Plan develops.

Kind regards

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## **Appendix**

### **Housing**

In paragraph 6.1 on the Issues and Options Consultation Document, it is acknowledged that Medway cannot prepare its local plan in isolation but must consider the wider context, to ensure that its policies align with strategic plans and are co-ordinated with those of neighbouring areas.

Paragraph 6.9, notes that the Council is engaged in on-going work with neighbouring planning authorities on cross-boundary matters through the Duty to Cooperate. It then seeks to ensure, in paragraph 6.10, that strategic issues are effectively addressed in the preparation of the new Local Plan.

In paragraph 7.8, it is stated that the Government requires local planning authorities to determine the objectively assessed needs for housing in their strategic housing market areas.

Paragraph 7.9 refers to the Strategic Housing and Economic Needs Assessment (SHENA) and its findings that Medway has complex relationships with a number of neighbouring boroughs and that these could be seen as a basis for a housing market area extending outside the Medway area. However, it does not acknowledge that the SHENA identifies one of these neighbouring boroughs as Gravesham.

Although:

- Medway's acknowledgement that the wider context must be considered in its plan making;
- The Government's requirement for local planning authorities to determine objectively assessed needs for their housing market areas;
- The findings of the SHENA that Medway and Gravesham share a common housing market area and;
- The request from Gravesham that the Councils jointly explore the possibility of some of its housing need being met in Medway,

Paragraph 7.10, states that the Council is embarking on the plan preparation process with the intention meeting its objectively assessed needs identified for its administrative area. It makes no reference to the wider housing market area.