

Response to Medway Local Plan Development Strategy Consultation Document

Medway's consultation

- 01 Thank you for giving us this opportunity to comment on Medway Council's consultation on its Local Plan Development Strategy. With both Authorities out to consultation at the same time, albeit at different stages, there is an opportunity through the duty to co-operate mechanism to tackle common issues.
- 02 Medway Council are working towards six key milestones to successfully adopt a new Local Plan for Medway. There are:
- 1) Issues and options
 - 2) Development options
 - 3) Development strategy**
 - 4) Publication of draft plan
 - 5) Submission for independent examination
 - 6) Adoption
- 03 Medway started its Local Plan development strategy consultation on 16 March and comments have to be submitted in writing by 12pm on Monday 25 June 2018. This is the third milestone and a key stage as they pull together all the components for the plan that they intend to publish and then submit.
- 04 There are four scenarios:

| | Locational split | | | Summary | | Total given for scenario |
|--|------------------|----------------|-----------------|-----------|-------------------|--------------------------|
| | Urban sites: | Hoo Peninsula: | Suburban sites: | New Sites | Existing Pipeline | |
| Scenario 1 | 12,775 homes | 9,318 homes | 4,528 homes | 16,500 | 13,500 | 30,000 |
| Scenario 2: Investment in infrastructure to unlock growth | 12,775 homes | 11,750 homes | 3,179 homes | 17,500 | 13,500 | 31,000 |
| Scenario 3: Meeting government's target of local housing need of 37,000 homes | 14,194 homes | 12,162 homes | 6,276 homes | 22,500 | 13,500 | 36,000 |
| Scenario 4: Consideration of development within Lodge Hill SSSI | 12,775 homes | 10,357 homes | 4,108 homes | 17,000 | 13,500 | 30,500 |

Duty to Co-operate

- 05 The consultation document acknowledges that Gravesham and Medway share a housing market area. It notes that the Localism Act, 2011, places a legal duty on local planning authorities to cooperate in relation to strategic matters. It explains that Medway Council will engage with Gravesham Borough Council on their respective plans through the Duty to Cooperate and prepare a Statement of Common Ground to address cross-boundary development issues, including the supply of housing land.
- 06 Through the duty to co-operate, engagement to date on the supply of housing land has focused upon the need for Gravesham Council to demonstrate that it is unable to make sufficient provision to meet its own housing needs before Medway Council will consider accommodating any of Gravesham's unfulfilled needs. Gravesham considered that this position by Medway was entirely reasonable. Whilst residents and businesses generally accept a local need for housing, meeting the needs for other local authorities can be much harder to accept and so the considerations need to be transparent. However, circumstances are now changing due to proposed alterations to national policy, and so a slightly different approach to the duty to cooperate is likely to be required in the future. Three points in particular are of note.
- 07 Firstly in April, 2018, Gravesham Council published a document entitled "Site Allocations: Issues and Options" as part of its Regulation 18 Local Plan consultation. This identified that additional sites would need to be found for approximately 2,000 dwellings during the plan period up to 2028. It recognised that if Gravesham's housing needs are to be fully met within the Borough, it is likely that land for development would need to be released within the Green Belt. The actual amount, and potential location(s), is yet to be determined.
- 08 Secondly, the timetables for the preparation and adoption of the respective local plans are not in synchronisation. Medway aims to publish a draft plan in late 2018, with Submission for Examination in March 2019, and adoption in 2020. Gravesham is aiming for a second round of Regulation 18 consultation in 2019 and Submission in 2020. Consequently, the Medway Local Plan could be adopted before the housing supply position is confirmed in Gravesham. This would mean that the Medway Local Plan would have gone through the plan making process without considering the issues of meeting some of Gravesham' housing requirements.
- 09 Thirdly, the process of considering a neighbouring authority's request to meet some of its housing demand is changing as a result of proposed alterations to the NPPF. Given that the Government is proposing to adopt the revised NPPF in the summer of 2018, Gravesham Council considers that it should be taken into account in the preparation of both the Gravesham and Medway Local Plans.
- 10 The proposed amendments to the NPPF state that in future, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, plan making authorities should have fully examined all other reasonable options for meeting their identified need for development. Those options include whether the strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. This means that Gravesham cannot identify any land within the Green Belt for development (and hence whether there are any special

circumstances to justify amendments to the Green Belt boundary) before Medway has considered whether it could accommodate some of Gravesham's identified need. As stated above, that need amounts to 2,000 dwellings.

- 11 Consequently, the current approach to the duty to co-operate, referred to above, is likely to be overtaken. There will be no longer any requirement for Gravesham to identify the balance of unmet need for Medway to consider. Indeed, it is not allowed to do so. It is a matter for Medway to look at its overall housing land provision and to determine whether any of it can be allocated to meet some or all of Gravesham's needs.
- 12 As a result, there is no reason why that consideration by Medway cannot be undertaken immediately and the results taken into account in the Draft Plan to be published in late 2018. Gravesham Council therefore requests that both Councils immediately embark on the preparation of a Statement of Common Ground under the duty to co-operate, in order that it is completed and its results taken into account before the publication of Medway's Draft Plan later this year.
- 13 The consultation document notes that Gravesham Council has sought flexibility within the Medway Plan to meet the wider housing market area's needs, should excess residential land be identified during the plan preparation process. This remains Gravesham's position and the following paragraphs demonstrate that excess residential land has been identified by Medway Council.
- 14 Three of Medway's four scenarios identify a surplus of sites over the SHENA Objectively Assessed Housing Need. This could make a contribution to meeting some of Gravesham's housing need without having to identify additional sites. The surpluses are as follows:
 - Scenario 1 +487;
 - Scenario 2 +1,570;
 - Scenario 4 +1,106
- 15 Scenario 4 acknowledges that the Lodge Hill proposal for 2,000 dwellings would be part of a wider strategic development of the Hoo rural town. However, it is only combined with scenario 1. It would be logical to combine Lodge Hill with scenarios 2 and 3 as well, given that they also include the proposed Hoo rural town. If scenario 1 included Lodge Hill without removing land at Capstone Valley and Lower Stoke, the surplus would rise by 2,000 to a total of 2,487, the surplus for scenario 2 would rise to 3,570 and the current deficit of 1,182 in scenario 3, could be changed to a surplus of 818 dwellings.
- 16 The surpluses are identified in the consultation document as "buffers to allow for flexibility in the strategy". This can be interpreted in two ways. It could allow for replacement sites for those which do not come forward as expected. Alternatively, flexibility in the strategy could mean an integrated strategy which includes a contribution to meeting some of Gravesham's housing need. Gravesham Council would support the latter interpretation but also considers that the plan could accommodate both interpretations.

- 17 If the surplus land were to be earmarked under the duty to cooperate to meet some of Gravesham's development needs, additional sites could be identified on a contingency basis should any of the identified sites fail to materialise. This is because each option excludes sites which have been identified as potential allocations, as follows:
- Scenario 1 excludes land to the east of Rainham and at Lodge Hill;
 - Scenario 2 excludes land at Lodge Hill, Capstone Valley, east of Rainham and north of Rainham;
 - Scenario 3 excludes land at Lodge Hill: and
 - Scenario 4 excludes land to the east of Rainham and part of the Capstone Valley
- 18 When the Development Strategy was considered by Medway's Cabinet on 16th March, 2018, the report contained a map for each scenario which identified the sites to be included in them. The Key listed them as Potential Site Allocations. Taking Scenario 2 as an example, sites were excluded at Rainham and Capstone Valley which had been included as potential allocations in other scenarios. According to the Strategic Land Availability Assessment of 2017, these sites comprised a total of 116 hectares (rounded).
- 19 Consequently, there are three sources of land which could make a significant contribution to meeting some of Gravesham's housing need: surpluses already identified in three of the scenarios; the additional provision of 2,000 dwellings to each of those scenarios by the inclusion of Lodge Hill; and land identified as potential site allocations at Capstone Valley and Rainham. Sufficient land could also be identified to provide a "buffer" if required.
- 20 A further scenario is proposed below by Gravesham Council, which would also have sufficient capacity to make a contribution to meeting Gravesham's housing need.

Other Comments

- 21 **Transport** – Any development (with employment) on the scale being talked about in the consultation document will naturally give rise to significant questions about the impact on transport networks (road and rail) in North Kent. In particular development on the Hoo Peninsula will feed trips onto the highway and rail networks that pass through Gravesham with potential significant implications. The Council is aware that Medway has ongoing technical work in this area, and that one of the key issues will be the modal split that can be achieved, hence for example the HIF bid for the Isle of Grain Branch.
- 22 Another key study in this will be the results of the transport modelling work currently being undertaken by Highways England for the Lower Thames Crossing.
- 23 **Employment** – it is important that the scale of housing provision and provision of jobs in the vicinity is matched give the potential implications for the transport network if significant additional long distance trips need to be catered for.
- 24 **Vision** - Whilst the proposed town at Hoo St Werburgh has been included in all the scenarios, it is surprising that it has not been included in the Vision.

- 25 **Lodge Hill** - Given that the town at Hoo is a component of all the scenarios, it is surprising that Lodge Hill has been excluded from all but one of those scenarios. Given its close proximity to Hoo and Chattenden, it should logically be considered as an integral part of the Hoo town concept.
- 26 **Buffer Sites** - The levels of the “buffer” for each scenario appear to be entirely random with no evidence cited to justify such an allowance. If, for example, a buffer of 487 is appropriate for scenario 1, why would it not also apply to scenarios 2 and 4, given that the overall housing need is the same for each scenario?
- 27 **Meeting the Government’s Housing Need Target** - Having decided to include scenario 3, Meeting the Government’s Proposed Calculation of Local Housing Need, the scenario fails to meet the required level of growth, showing a shortfall of 1,182 dwellings. The scenario should have included sufficient sites to meet the full need and the implications of doing so should have been explored.
- 28 If Lodge Hill is included in the scenario, the Government’s housing need target would have been met. If Lodge Hill is not viable, either alternative sites would need to be found but if this approach is explored and found wanting, Medway Council might need to conclude that the 37,143 dwellings cannot be provided by 2035.
- 29 The consultation document states that this level of housing need (37,143 homes) is incredibly challenging and would require a radical change in how development is delivered. However, it does not put forward any indication of what might constitute such a radical change. One possibility might be a Hoo town brought forward by a Development Corporation. As part of this, the optimal settlement size for such a delivery mechanism would be considered and the possibility of development continuing beyond 2035.
- 30 Alternatively, Medway Council could look again at the revised local housing need given that the 2035 figure in scenario 3 is not, in fact, entirely the Government’s calculation as the standard methodology currently only provides data for 2016-2026. Medway’s calculation has projected forward the Government’s annual OAN to 2025 and Gravehsam suggests for a number of reasons, carrying forward this annual requirement up to 2035 can be challenged.
- 31 It appears that Medway has not simply applied the Government’s annual housing need figure of 1,665 dwellings to the 23 year local plan period as this would have resulted in a total of 38,295 dwellings instead of the 37,143 that has been adopted. Instead, it appears to have allowed for the SHENA figure of 1,281 dwellings per annum from 2012 to 2015 and 1,665 per annum from 2016 to 2035.
- 32 It is suggested that Medway should consider a further scenario which only applies the Government’s annual requirement from 2016 to 2026 and applies the SHENA requirement for the remainder of the plan period. The reasons for doing so are set out as follows:
- The Government has only identified an annual housing need for each local authority up to 2026. The need post 2026 has not been calculated by the Government;
 - The SHENA has identified housing needs up to 2035;

- New ONS 2016 based population projections published in late May suggest an increase of 40,500 persons for 2016-2035 compared with 51,000 from the 2014 based;
 - Medway Council has concerns with the Government's methodology and its application given that Medway is comparatively, one of the most affordable areas in the South East;
 - The rate of annual growth in Medway's population has slowed in recent years from the peaks shown between 2012 and 2014. Rates of growth in 2016, were under 60% of the level seen in 2012.
 - Migration trends have been very volatile in recent years. There is also some uncertainty on assumptions informing national projections of migration, particularly after the UK exits the European Union;
 - Mid-year population estimates are published annually and household projections are produced every two years. Consequently, data is continually changing and will do so many times up to 2035. This raises the possibility that housing need projections over such a long period could become substantially out of date;
 - The Medway Local Plan is programmed for adoption in 2020. The draft NPPF requires local plans to be reviewed within 5 years of adoption. Consequently, there is sufficient time available to amend the post-2026 housing requirement, if necessary, based on updated information and updated Government calculations based on the standard methodology;
 - The Government has not yet published its response to the consultation on the standard method;
 - The Government's advice that local planning authorities use the standard method where emerging plans have not yet been submitted for Examination before Spring 2018, would still have been followed for the period up to 2026, to which the Government's figures apply.
- 33 It is therefore proposed that Medway Council consider a fifth scenario, based upon a housing need of 1,281 dwellings per annum from 2012 to 2015, 1,665 dwellings per annum from 2016 to 2026 and 1,281 dwellings per annum from 2027 to 2035, giving an overall requirement of 33, 687 dwellings. The post 2026 figures would be the subject of a post adoption local plan review.
- 34 If the same sites were to be included as in scenario 3, excluding Lodge Hill, a supply of 35,961 dwellings would meet the 33,687 requirement with a surplus of 2,274. This would increase to 4,274 if Lodge Hill came forward.

Green Belt

- 35 The Development Strategy Consultation booklet appears to suggest by the wording (page 2) "... and by our important environmental assets. Our Special Protection Areas, Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty and Green Belt bring both environmental advantages and constraints" that Green Belt is an environmental constraint. Green Belt is a spatial/social policy constraint.

36 The Consultation booklet advises that (page 5) that “we will continue to resist inappropriate development in the Green Belt to the west of the Medway”. This is also Gravesham Borough Council’s approach, but we do need to flag that our April 2018 consultation includes an option to develop land to the west of Strood. Depending on the outcome of duty to co-operate discussions and our Member decisions on growth, this could, in due course, be selected as an area of growth which would require safeguarding or allocation.

Conclusion

37 In summary the Borough Council:

- welcomes the consultation and ongoing duty to co-operate discussions on issues of mutual interest;
- finds that the logic of the scenario’s is not always clear but there does appear to be scope to take some of Gravesham’s housing requirement;
- identifies that there are specific series of issues in relation in particular to housing, employment, Green Belt and transport that need to be further addressed;
- commits to discussing these in detail through the duty to co-operate process in the context of the proposed changes to the NPPF.

22 June 2018