#### Housing Note: UPDATE – Lower Rainham

# LPA Ref: MC/19/1566

## March 2020

Following on from the submission of planning application ref. MC/19/1566, new information has been published regarding the Council’s housing supply position. The updated evidence includes (in order of publication):

* Housing Delivery Test Action Plan (August 2019);
* Authority Monitoring Report (December 2019);
* Medway Strategic Land Availability Assessment (SLAA, December 2019);
* Housing Delivery Test 2019 Results (February 2020).

In addition:

* In November 2019 it was announced that the Council had been successful in its Housing Infrastructure Fund (HIF) bid;
* In the most recently published housing appeal decision involving the Council (decision letter dated 22 January 2020) (ref. MC/18/2047) the Inspector records the Council’s agreement that its housing land supply is “*just over 3 years*”. We are unaware of any housing-related developments that improve upon this extremely disappointing housing land supply position.

#### Housing Requirement

Updated affordability ratio figures (affecting the Standard Method) have been published by Central Government. Accordingly, the revised housing requirement for Medway is shown to be 1,693 dwellings per annum (dpa).

#### Housing Supply

The most recent housing appeal decision for Medway (ref. PP/A2280/W/19/3223080) was published on 22 January 2019: for 50 dwellings at Land east of Mierscourt Road, Rainham.

Paragraph 4 of the appeal decision states:

*“Both main parties were agreed that the Council could not demonstrate a five years supply of land for housing (5YHLS). However, I was not originally appraised of the extent of the shortfall. I therefore asked the two parties to agree the latest situation. The parties agreed that the Council could demonstrate just over 3 years supply of land for housing and this decision takes account of that agreement.”*

This agreement – unequivocally recorded in the decision letter – squarely contradicts and fundamentally calls into question the position previously presented in the Council’s AMR (December 2019). This had claimed a supply of 10,287 units over the period 2019/20 to 2023/24. This claim, since abandoned by the Council, had proven highly questionable in any event.

For present purposes only, the deliverability of the AMR 2019 claimed figure (which has never been accepted) may nonetheless be considered briefly here, and in the light of:

* Historic shortfall; and
* Future deliverability

## AMR 2019 - Historic Shortfall

The AMR 2019 records that Medway has an undersupply of 1,046 units in Year 1 of the Plan (2018/19) and suggests this will increase, by 434 units, in Year 2 (to be included in any 5YHLS position statement).

## AMR 2019 - Future Deliverability

Contrary to the (later, superseding) agreed position set out in the appeal decision of January 2020 (which, it is assumed, the Council confirms is the up-to-date position), the Council had previously asserted a 5YHLS in the AMR 2019.

### The Council also announced that it has been awarded HIF money. It suggests that this funding will ‘unlock’ the delivery of 10,000+ houses. The explanation for this claim has not been given. Noting however a recent consultation document that explains Medway’s HIF proposals (published 06 March 2020), and additionally, the timescales for similarly scaled HIF schemes, it is respectfully inconceivable that Medway may complete HIF-funded works before 2025, still less achieve their substantial completion. The extent of delivery is therefore far from certain on this basis alone, and the timescale previously offered up, is shown to be, upon any cursory analysis, wholly unrealistic.

Not least, the AMR 2019 wrongly includes, within the sites making up its claimed 5YHLS, sites that are HIF dependent. Following on from outline consideration undertaken of these sites, it is immediately clear that none benefit from extant planning permission (whether full or outline) and, moreover, none are shown to be ‘deliverable’ for the purposes of the NPPF. As such, these sites cannot properly be included in supply, as they have wrongly been. On this basis alone the Council’s approach adopted in the AMR is confirmed as flawed. Indeed, the Council’s (later, and superseding) agreement of “*just over 3 years*” supply supports this conclusion.

**SUMMARY**

Medway has a minimum housing requirement of 1,693dpa.

The Council’s own most recent and considered position is that it may demonstrate merely a housing land supply of “*just over 3 years*”. Upon separate analysis, we have no reason to properly find any higher supply figure.