

**HEARING STATEMENT
MATTER 3: MEETING HOUSING NEEDS**

HALLAM LAND (ID: E157, E.20)

(Q3.1) How has the housing requirement for the Plan period been assessed? What evidence underpins the housing requirement and how has national policy been applied in setting it?; and

(Q3.3) The Council states a housing requirement of 1,636 dwellings per annum to 2041 (circa. 24,540 homes). Is this the Plan's minimum requirement? How it has been set and explain how flexibility and contingency in its delivery is provided.

- 1.1 Q3.1 and Q3.3 are taken together as they both relate to the derivation of the housing requirement.
- 1.2 National policy has not been appropriately applied to the setting of the housing requirement. The Council accepts that the Local Plan is unlikely to be adopted in 2026 (MLP/ED6). The NPPF (December 2024) requires the Local Plan to look ahead 15 years from the date of adoption. Assuming this occurs in 2027, the plan period should extend to 2041/42. The Council appears reluctant to address this issue and doing so materially suppresses the actual housing requirement. This is not only inconsistent with national policy, but also doesn't align with the Council's own vision and objectives for Medway.
- 1.3 Adequate flexibility and contingency have not been provided for in the Plan. Table 2 of the Housing Delivery Topic Paper (B22.5) demonstrates that, even with the existing (inappropriately defined) plan period, the Local Plan only plans for a surplus of 150 homes. This is concerning in the context of (1) reliance on sites with notably unresolved environmental and transport constraints and (2) unrealistic trajectory assumptions, particularly on those constrained sites. We refer to our Regulation 22 representations (MLP/ED16A, E.20, Infrastructure and Housing Delivery) which provides more detailed commentary on specific strategic allocations and which will be discussed in Phase 2 of the Examination.
- 1.4 In addition to the above, a buffer of 150 homes provides no meaningful protection against the delays that some strategic sites typically experience, including the delivery of upfront costly infrastructure and potentially complex landownership. A nominal buffer underpinned by an unrealistic trajectory provides very limited flexibility and contingency. In any event, appropriately defining the plan period wholly erodes this nominal buffer.
- 1.5 It is prudent that the Council now explores additional site opportunities that provide genuine contingency (having not effectively done so as part of its SA process). This would result in a more robust strategy and help to mitigate against the plausible risk of delay or failure of one or more strategic allocations.

(Q3.2) How does the Plan demonstrate that the housing requirement is realistic and deliverable in light of the constraints identified in the evidence base?

(Q3.6) Does the Plan clearly set out the expected, 'planned-for' sources of housing supply to meet the identified housing requirement;

(Q3.8) How does the Plan demonstrate that the housing trajectory is deliverable across the Plan period, including on strategic sites?; and

(Q3.10) How have identified constraints (environmental, highways, utilities, flood risk) been factored into site capacities and delivery timings? If they have not, why?

- 1.6 Hallam Land will consider Q3.2, Q3.6, Q3.8 and Q3.10 together as these four questions focus on the robustness of the housing supply. We anticipate that detailed site-specific discussion will fall within the remit of the Phase 2 Hearings and therefore constrain our views here to the consequences of those deficiencies only.
- 1.7 The housing requirement is neither realistic nor deliverable. Firstly, and as set out above, the Council relies on a nominal supply buffer which is wholly eroded when the plan period is amended to be consistent with national policy. Notwithstanding that, there is no flexibility or contingency to provide resilience should any allocation be subject to delays or fail to deliver.
- 1.8 Secondly, the Council relies on two strategic allocations (Hoo St Werburgh and Chattenden (Policy SA8, 5,300 homes) and Capstone Valley (Policy SA7, 3,958 homes) to deliver almost half of its housing requirement. Both sites are subject to unresolved environmental and transport constraints as detailed in our Regulation 22 representations (MLP/ED16A, E.20, HRA / Transport), with transport costs still unfunded and unlikely to be met by developer contributions. The Plan also relies on sites which are subject to EA objections (MLP/ED16A, E.15) as discussed in our representations to Matter 1 (Q1.6 / Q1.7). There therefore remains uncertainty regarding the principle of development, the impact on viability, and consequently the overall deliverability.
- 1.9 Notwithstanding these weaknesses, the housing trajectory front-loads housing delivery at Hoo St Werburgh and Chattenden (Policy SA8) and Capstone Valley (Policy SA7). The housing trajectory indicates that both allocations are capable of delivering first completions within the first year of the Local Plan (parcels HHH25/33), with Capstone Valley (parcel LW6) seemingly reaching annual delivery rates of 233dpa by year 2. This is unrealistic and undermines the robustness of the trajectory. We refer to our Regulation 19 (C1.2, E.157) and Regulation 22 representations (MLP/ED16A, E.20) which detail the flaws in the Council's overreliance on these particular sites. Lichfield's *Start to Finish* Insight Report¹ is widely cited within the development industry as being a reference guide for delivery trajectories: the Council's trajectories appear unreasonably optimistic in light of the Lichfields research. Whilst specific site allocations will be discussed during Phase 2 Hearings, the Plan's

¹ <https://lichfields.uk/content/insights/start-to-finish-3>, as referenced in our R.19 submissions ((C1.2, E.157)

fundamental reliance on these sites within the overall trajectory is pertinent to this Matter given that it underpins the overall deliverability of the Local Plan.

- 1.10 The combined effect of the nominal supply buffer and overreliance on sites with unresolved technical matters undermines the resilience of the Local Plan. Failure to address this could lead to inability to demonstrate a 5YHLS, failure of the Housing Delivery Test, and ultimately a Local Plan that fails to deliver its own vision and objectives. In that context, contingency land supply is required.