

DCLG Consultation on proposed changes to National Planning Policy

Response from Medway Council

Introduction

The NPPF is a key driver for the delivery of well-planned, sustainable development and growth. The way it shapes plan-making and development control decisions will impact both the present and future generations. It is therefore vital that changes to the NPPF are well thought through and considered in an holistic manner.

Medway Council is working hard to deliver a new Local Plan to meet its objectively assessed needs for all matters and particularly in relation to our housing and employment needs. We are a regeneration authority and will shortly be announcing a development partner for Rochester Riverside – a brownfield site the Council, with assistance from HCA, has acquired, decontaminated and prepared for development, as well as bringing forward other brownfield sites within the Council's control for development, albeit that there are issues regarding contamination and flood defence that need to be addressed.

The work on the Local Plan will seek to address all matters including housing provision, but also seek to protect important heritage and landscape/ecological areas such as SSSI's, SPA's etc. It will also be aspirational and challenging and will seek to revitalise our town centres and provide for high quality employment areas, and to provide the necessary infrastructure to deliver sustainable communities and development. The aspiration must be to deliver high quality housing to meet the objectively assessed needs for Medway, with the necessary employment, education, leisure, health and transport facilities to provide balanced sustainable communities.

The Council supports the principle of meeting the housing needs for our area and also cheaper homes for first time buyers. It is also supportive of the principle of bringing forward appropriate brownfield sites for housing and to consider higher densities in appropriate locations.

However, the Council considers that the proposals put forward within the consultation document do raise issues that are of concern and in particular the following matters:

- Many of the suggested changes undermine the principles of a plan led system and seem designed to allow development to by pass the planning system and

to penalise planning authorities for the failure of developers to deliver housing, particularly where planning permission has actually be granted.

- The proposals fail to recognise that the main constraint is the capacity of the industry to build the required numbers. The recession resulted in the loss of a number of building companies, particularly those at the important mid range building between 10 – 50 units on the smaller sites but which provide for the majority of housing built. In addition there is a need to provide the necessary trades people to serve the required expansion of the building industry and there needs to be more links from the building industry to the education establishments providing for the trained employees of the future. Finally there is also a material shortage which needs to be addressed in order to avoid construction costs escalating and further reducing the affordability of housing.
- The proposals for starter homes are welcomed in principle, but applying the discount for only 5 years will impact on affordability in the future, while the proposals should not be at the expense of the supply of affordable housing for rent.
- The proposed approach towards allowing commercial and employment land to go for residential development could fundamentally undermine regeneration schemes where attracting the necessary employment and commercial investment necessary to provide balanced and sustainable communities can take many years.
- The proposals for increasing the supply of starter homes, without provision for the necessary infrastructure, by allowing exemption to CiL and S106 payments, will result in a serious infrastructure deficit putting increased pressure on school and health facilities as well as road networks and valuable open spaces, with the possible consequences of creating the deprived neighbourhoods of the future.

AFFORDABLE HOUSING

Q1 Do you have any comments or suggestions about the proposal to amend the definition of affordable housing in National Planning Policy to include a wider range of low cost home ownership options.

Medway Council recognises the Government's aspiration to increase home ownership, and supports the principle of increasing the supply and range of house purchase options. The overall imbalance in the UK housing market, and particularly the distorted markets of London and the South East, is the result of many factors. But prominent amongst these is the slow pace at which developers and housebuilders implement the planning permissions they have secured, or failure to implement those permissions at all, which means that houses planned for have for decades been delivered in insufficient numbers. Add to this the impact of the recession and the overall reduction in the number of house building companies and

particularly those providing housing within the important mid range sites of between 10-50 units and there is the key to addressing the delivery of housing to meet needs.

Medway Council is concerned that the proposal to offer a discount on the price of starter homes for only 5 years will result in the longer term reduction of the availability of affordable housing. The discount should therefore be provided in perpetuity and occupants should be subject to the normal affordable housing tests.

Linked to this, Medway Council is concerned that discounted starter homes, while an addition to the affordable housing provision should not be to the detriment of other types of affordable housing provision such as shared ownership and affordable rent,, which history shows can change and individual Local Authorities should be encouraged to use the most appropriate type/tenure to meet the needs of their particular area, which should and will have been objectively assessed. Furthermore, if the starter home discount initiative is going to be time limited then it should not be a replacement of other forms of affordable housing but in addition to ensure that there is no future reduction of affordable provision from what would normally be secured.

One of the main reasons advanced by developers for stalling housing developments is viability, particularly in areas of low land values. The redefinition of affordable housing risks creating more situations where developers will seek to negotiate to remove affordable housing for rent, particularly social rent, from development schemes on grounds of viability and to protect or boost their profit margins. Amending national planning policy to redefine affordable housing needs to be accompanied by suitable measures to ensure robust and transparent viability tests. There also need to be safeguards to ensure that local planning authorities can seek provision of affordable rented property where local housing needs assessments demonstrate an unmet requirement for additional provision.

The proposals for increasing the supply of starter homes, without provision for the necessary infrastructure, by allowing exemption to CiL and S106 payments, will result in a serious infrastructure deficit putting increased pressure on school and health facilities as well as road networks and valuable open spaces, with the possible consequences of creating the deprived neighbourhoods of the future.

Q2. Do you have any views on the implications of the proposed change to the definition of affordable housing on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?

The redefinition of affordable housing will have a negative impact on the extent to which new developments provide for people who are unable to afford home ownership, and on future provision of homes at an affordable or social rent. The

number of households on council waiting lists remains a strong indicator of the continuing need for affordable rented housing – 1.37 million in England at 1 April 2014. In Kent and Medway, the waiting list of nearly 38,000 households was lower than the peak of 2013 but still 11% above the average of the last 20 years. There will be a higher proportion of vulnerable people in these households than in households generally, for example people with a long-term illness or disability and lone parents. At the same time, local authorities in North Kent are experiencing sustained pressure of households presenting as homeless, with a 17% increase in acceptances over 2007 levels compared with a 20% fall nationally, and 111% increase in total decision compared with a 26% fall nationally. We suggest that the Government needs to consider safeguards to ensure that the mix of types of affordable housing delivered by individual schemes is responsive to local need and pressures as well as to local aspiration.

INCREASING RESIDENTIAL DENSITY AROUND COMMUTER HUBS

Q3. Do you agree with the Government's definition of commuter hub? If not, what changes do you consider are required?

Q4. Do you have any further suggestions for proposals to support higher density development around commuter hubs through the planning system?

These questions need to be taken together. In principle Medway Council supports the rationale of increasing densities around commuter hubs. However there needs to be 2 provisos to this.

The first is that all sites are different. There are some sites where it is entirely appropriate to increase densities, such as commuter hubs within city or urban centres. But there are other commuter hubs where a more sensitive response is more appropriate such as in conservation areas or rural areas. It should be for Local planning Authorities through their Local plans to identify those hubs around which higher densities can be achieved and for that to be made clear through relevant policies in the Development Plan. The NPPF should therefore encourage higher densities around hubs in appropriate locations and for this to be made clear in Local Plans and relevant policies.

The second proviso is that the role and function of transport nodes should be considered holistically and not exclusively for their potential to support increased housing. Medway Council supports in principle the proposition that areas in the vicinity of nodes or hubs that are well served by public transport may successfully support higher housing densities. But areas around transport nodes also have potential to be sustainable commercial and employment uses or a mixed use. The Government's proposals appear exclusively to focus on potential for additional

housing. This is not likely to be the most sustainable approach and contradicts the principles underpinning paragraph 37 of the current NPPF. There may, for instance, be a clear rationale for office or mixed use development around public transport hubs, where this is a viable use, since public transport usage tends to be greater for high density employment uses than for residential use. We suggest that any adjustments to national planning policy should emphasise the opportunity, subject to supporting infrastructure, to increase both housing and employment uses in the vicinity of transport nodes or commuter hubs and that the detail in relation to this should be clarified in Local Plans and relevant policies.

Q5. Do you agree that the Government should not introduce a minimum level of residential densities in national policy for areas around commuter hubs? If not, why not?

Agree. Appropriate densities are contingent on the characteristics of an area and density should be led by sound urban design principles.

SUPPORTING NEW SETTLEMENTS, DEVELOPMENT ON BROWNFIELD LAND AND SMALL SITES AND DELIVERY OF HOUSING AGREES IN LOCAL PLANS

Q6. Do you consider that national planning policy should provide greater policy support for new settlements in meeting development needs? If not, why not?

While Medway Council do not oppose this in principle and indeed are supporting a new sustainable community settlement at Lodge Hill on MOD owned land, such proposals should be tested as part of the options for a development strategy through the Local Plan process. We are currently at issues and options consultation (and are working with DCLG reps and PAS) and one of the options under discussion is a new sustainable settlement. In this respect the development strategy is at the heart of the Local Plan process and fundamental to local choices.

Even where housing land supply is challenging it is unlikely that in most cases a new settlement would be a “first choice” for developers outside of the plan process. This would appear to contradict para 157 of the NPPF.. Allowing this to be diluted by proposals outside of the Local Plan is the complete antithesis of the plan led process and works against coordination of sustainable, appropriate and timely infrastructure and transport provision (para 162 of NPPF in particular). There may be circumstances where a new settlement provides a sustainable solution but such decisions will profoundly affect the local area and should properly be considered through the Local Plan process. Indeed with Lodge Hill, this is referred to in our current adopted Local Plan and is an option being considered within work on the new

Local Plan.. The full implications of any proposed new settlement should be properly addressed through a Local Plan and weight should be added to this presumption in any revision to the NPPF.

Q7. Do you consider that it would be beneficial to strengthen policy on development of brownfield land for housing? If not, why not and are there any unintended impacts that we should take into account?

Medway Council supports the development of brownfield land but housing should not be at the expense of other land uses. A balance is needed to ensure sustainable communities with jobs, homes and community facilities within walking distance.

The fact that a site may be suitable for redevelopment does not automatically mean that any proposal that is put forward for that site would be acceptable. The proposal for granting permission in principle for new homes on suitable sites carries considerable risk of unsuitable and poor quality development by-passing normal planning evaluation and undermining the commitment to high quality design in paragraphs 56-66 of the NPPF.

Medway Council is strongly in favour of brownfield land being brought back into productive use: this is fundamental to regeneration schemes. What the most appropriate use is will vary according to the circumstances of the case. There is brownfield land that could be equally suitable for housing, commercial or mixed use. Some brownfield sites may be suitable for such uses but also possess other qualities, for example biodiversity, that deserve proper consideration. A presumption along the lines proposed could have unintended consequences such as housing being developed close to viable business sites and then the existing unneighbourly uses become under pressure to reduce operating hours or noise outputs which then impacts on the viability of the business. Also existing and ideal employment land will become under pressure to be converted to residential as landowners seek to capitalise on residential land values and this may result in existing good and viable businesses being lost.

It is suggested that the appropriate way of bringing forward brownfield sites be that for housing, commercial or a mixed use etc, should firstly be through the Local Plan process. Development briefs that accord with the local plan and have been subject to public consultation would then be a more effective tool for stimulating and delivering appropriate development on identified sites.

Q8. Do you consider that it would be beneficial to strengthen policy on development of small sites for housing? If not, why not? How could the change impact on the calculation of the local planning authorities' five-year land supply?

Medway Council, consistent with many other Council's have policies in the existing Local Plan that support appropriate development on small windfall sites. It would be reasonable within the current Local Plan process to identify similar policies encouraging appropriate and well designed proposals on such small windfall sites while protecting against unwanted development of back gardens.

In relation to small sites immediately adjacent to settlement boundaries, there is a concern that this could result in creeping urbanization and of the countryside and as such would require careful policy wording within the Local Plan process rather than changes to national policy.

Q9. Do you agree with the Government proposal to define a small site as a site of less than 10 units? If not, what other definition do you consider is appropriate, and why?

See answer to Q8, and the need to emphasise the need for a plan led system.

Cumulatively, small sites may contribute a substantial portion of housing supply. This can be positive and to be welcomed in the right circumstances, but it is important that small schemes also make an appropriate contribution towards infrastructure requirements so as to avoid a cumulative infrastructure deficit and to enable planning authorities and providers (including utilities) to plan for and negotiate timely provision.

Q10. Do you consider that national planning policy should set out that local planning authorities should put in place a specific positive local policy for assessing applications for development on small sites not allocated in the Local Plan?

Medway Council already has within its current Local Plan policies which relate to consideration of such windfall sites and will take forward the principle of such similar policies within the current Local Plan work

ENSURING HOUSING IS DELIVERED ON LAND ALLOCATED IN PLANS

Q11. We would welcome your views on how best to implement the housing delivery test, and in particular:

- **What do you consider should be the baseline against which to monitor delivery of new housing?**
- **What should constitute significant under-delivery, and over what time period?**

- **What steps do you think should be taken in response to significant under-delivery?**
- **How do you see this approach working when the housing policies in the Local Plan are not up-to-date?**

It is Medway Council's view that the suggested sanctions against planning authorities would be counter-productive. The Government's declared aim is to accelerate delivery, particularly of new housing. Tools such as planning performance agreements already provide mechanisms to expedite the processing of planning applications and negotiation of s.106 agreements. Medway uses planning performance agreements very effectively and is well used and appreciated by the development industry (examples can be provided). Responses to the PPA's used by developers in Medway has been excellent and there is an acknowledgement that they provide certainty of timescales, build in response times and allow dedication of resources for both parties, who then move forward in partnership.

Medway also has regular meetings with developers at various levels. Developers of major or controversial schemes usually engage pre application with members via a presentation. As part of the question and answer session members will ask about delivery if a scheme were to be consented. This recognises that it is outside of the control of the LPA to require/control delivery other than to grant consent but encourages developers if they get permission to get on and build.

The Chairman of our Planning Committee and the Head of Planning try to meet annually with major developers to ascertain what they think of the planning service and to identify areas of improvement. In addition the question is asked as to what would assist developers to get on and build. This has resulted in some changes and actions to assist and this includes re looking at the wording and requirements of conditions but also allowing for developers to pay up front for assessments of matters such as ecology and archaeology pre application to enable surveys to be undertaken within certain times of the year – particularly bird and other ecology surveys. This can help speed up commencement of development on site.

Where schemes have already been consented, the leverage available to planning authorities to secure delivery is relatively limited. Paragraph 29 of the consultation document refers to discussions Government is having with housebuilders and others about what steps should be taken to drive faster build-out of schemes.

Identifying additional sites is not necessarily a solution. If sites are already in sustainable locations, well served by infrastructure and with clear prospects of delivery, it would be unusual for these not already to be allocated or identified in local plans, unless there are other weighty objections to their inclusion. Besides fulfilling all these tests, there would need to be demonstrable and tangible evidence of greater commitment to build out such sites to have confidence that these would

progress when other consented schemes have not. This is essentially the Local Plan process. To move outside of this makes it impossible to plan proactively and with certainty for supporting infrastructure.

The penalties for not having an up to date Local Plan in terms of lost appeals and associated costs is punitive enough.

A 2 year review period is far too short. A typical recession event, as recently experienced, is at least a 5 year event. Two years is barely sufficient to get planning permission, S106, commence site and any off site infrastructure prepared, and then actually built and market houses especially on medium and larger sites.

Medway Council suggests that the Government's efforts should focus primarily on how to boost both the capacity and the performance of the development and construction sectors, and look at what additional tools might assist planning functions in local authorities to ensure consented schemes progress and that landowners and developers bring forward sustainable proposals on allocated sites.

In addition Medway Council would recommend that consideration be given to allowing Local Authorities the choice of whether to stick with S106 agreements or to implement CiL. This is based on evidence ascertained to support the Communities and Local Government Committee report into the operation of the National Planning Policy Framework, which advised that CiL was not necessarily delivering the infrastructure necessary to serve developments. In this respect if a LPA chose to stick with CiL then the current requirement of limiting to 5 payments should be removed. This will enable S106's to deliver the infrastructure directly related to the development and if supported by a requirement for Council's to keep updated Developer Contributions guides, will provide the certainty that developers require.

Q12. What would be the impact of a housing delivery test on development activity?

A housing delivery test would not encourage housebuilders or land owners to build more houses as there is no reward for them.

The main outcome would be to put Councils and decision makers in councils under pressure (as well as putting pressure on already scarce resources) and result in poor decision making with resulting poor developments and impact on already stretched infrastructure including schools and health facilities. In turn that would put increased pressure on politicians and the communities.

While housebuilding needs to be increased it needs to be done in a way that creates excellent places to live. It is not right to have a period of panic housebuilding where

good design and place making goes out of the window and creates the slums of tomorrow.

What is required is to facilitate partnership working between the development industry and Local Authorities, based on good practices from around the country, up to date Local Plans and encouraging further the use of Planning Performance Agreements (as set out above) on the basis of partnership working.

SUPPORTING DELIVERY OF STARTER HOMES

Q13. What evidence would you suggest could be used to justify retention of land for commercial or similar use? Should there be a fixed time limit on land retention for commercial use?

This part of the Government's proposals is particularly problematic, notably in the context of regeneration, and appears to rely on rather slender evidence extrapolated into very broad assumptions. National policy intervention to set limits on local determination of sites' potential for commercial uses would, we suggest, require a stronger justification based on more thorough research and robust evidence about the status and distribution of commercial land across England than is referenced here.

It is crucial, of course, that local planning authorities take a realistic view about the prospects for development coming forward on any particular site, especially as what is fit for industrial and commercial purposes may change over time. The pace of technological change and innovation can make it hard to predict future requirements. However, we would caution against giving too much weight to land values to influence decision-making. With few exceptions, land values are heavily weighted in favour of residential rather than commercial uses. The consultation document states that "appropriate consideration" should be given to trends in land values for commercial and employment uses, against land values for other uses including residential. The implication is that higher value uses should determine the outcome: but this would simply widen the existing disparity between commercial and residential values, adding fuel to the fire of an already distorted market.

Our main concern about this proposed measure is the extremely damaging implications it could have for regeneration initiatives, as well as undermining local decision-making and the Local Plan process. Regeneration schemes and programmes can take decades to be realised in full. The Thames Gateway initiative (of which Medway is part) is a case in point. We are about twenty years into what could be a 70 year endeavour. Our goal, and that of regeneration schemes more generally, is sustainable economic-led growth – in other words, progress in delivering uplift in skills and attainment, employment and wealth-generating enterprise as well as new homes and facilities in sustainable communities. It is not

unusual for commercial investment to lag behind residential development, whether that comprises commercial developers building speculatively or companies investing in their own bespoke premises. Regeneration can also involve re-inventing a place, implementing a fresh vision and seeking to attract and grow new industries and markets.

Regeneration therefore requires a patient approach and local decision-makers need the flexibility to pursue a strategy responsive to local circumstances and ambitions. The starting point in terms of local evidence is ideally an up-to-date Local Plan; but other strategy documents may be relevant in setting out the rationale for an authority's overall approach towards commercial and employment uses to balance and support growth. The proposal that commercial sites should be protected for as little as three years before being released for Starter Homes takes far too short-term a view both of commercial property markets and of the dynamics of regeneration schemes. The existing paragraph 22 of the NPPF already provides an adequate framework for regular review of land allocations. We advocate that there should be no fixed time limit on retention of land for commercial or employment uses. It should be a matter for local determination (a) to ensure that sufficient commercial sites are identified and available for business investment, at the same time as (b) releasing for other uses sites which, even taking the long-term view advocated above, are unlikely to be delivered in a timescale that would justify their protection for those purposes.

Q14. Do you consider that the starter homes exception site policy should be extended to unviable or underused retail, leisure and non-residential institutional brownfield land?

Sites falling under this description may offer much broader potential for an area's future development or re-development than simply as a location for starter homes. This will vary from case to case and suggests that a blanket exceptions sites policy would not necessarily serve to support sustainable development.

We suggest that same broad principle should apply to under-used retail, leisure and non-residential institutional brownfield land as we advocate above should be taken with commercial sites (in response to Q13 above): in other words, looking at long-term potential and opportunities as well as at short-term pressures.

The Government should also clarify the definition and determination of "unviable".

It might be more appropriate for national guidance to give stronger encouragement to positive policies for beneficial re-use of underused retail, leisure and non-residential institutional brownfield land, including particular consideration as to whether they would be suitable for starter homes.

Q15. Do you support the proposal to strengthen the starter homes exception site policy? If not, why not?

The consistent experience across Medway is that concerns on the part of existing residents about new development proposals are more often than not as much about the impact on local infrastructure – transport, schools, local amenities and health facilities – as they are about the merits or otherwise of the developments themselves. This reinforces the point that for new development to integrate successfully into the fabric of existing communities, it must pull its weight in terms of supporting infrastructure.

Medway Council remains concerned that the Government's expectation that starter home developments be exempted from contributing towards infrastructure, such as via a CIL charging scheme, will result in or exacerbate deficits in transport, community and other infrastructure and facilities. Broadening the exceptions site approach would increase that risk and the negative consequences for the sustainability of new development. We suggest that a more precautionary approach should be taken toward classification of exceptions sites; that this should be more a matter for local determination than national guidance; and that development on exceptions sites should make an appropriate contribution towards local infrastructure.

Q16. Should starter homes form a significant element of any housing component within mixed use developments and converted unlet commercial units?

Conversion of commercial or other premises into residential use has to be regarded as irreversible. For this reason, careful consideration needs to be given to the impact such conversions might have, for instance on the street scene and future permitted activities in town centres. We concur with the proposition that there is potential for housing to play a greater role in town centre regeneration, and in principle starter homes might form an element of that. But we suggest that, in addition to our comments on Q13 about safeguarding longer-term commercial potential, housing proposals in mixed use developments should stand on their own merits and that wider planning considerations should not be set aside in favour of starter homes.

Q17. Should rural exception sites be used to deliver starter homes in rural areas? If so, should local planning authorities have the flexibility to require local connection tests?

No. As mentioned previously the fundamental flaw with starter homes is that without the subsidy being in perpetuity this policy would just be building housing in the

countryside. On these sites there should be a local connection and income requirements and the discount should be in perpetuity.

Q18. Are there any other policy approaches to delivering starter homes in rural areas that you would support?

No

Q19. Should local communities have the opportunity to allocate sites for small scale starter home developments in their Green Belt through neighbourhood plans?

Yes as this would be subject to independent examination and a referendum. One option could be to allow neighbourhood plans to make small amendments to Green Belt boundaries to allow the development of such sites. Again, neighbourhood plans should be able to include local connection and income restrictions where this can be justified.

Q20. Should planning policy be amended to allow redevelopment of brownfield sites for starter homes through a more flexible approach to assessing the impact on openness?

In principle Medway Council would support the development of previously developed land (rather than brownfield sites) located in the green belt provided they do not harm the openness of the Green Belt and are suitably located in terms of facilities and transport. As such, this is best dealt with through the Local Plan process.

TRANSITIONAL ARRANGEMENTS

Q21. We would welcome your views on our proposed transitional arrangements.

The six to twelve months proposed to review affordable policy is totally inadequate. To get it drafted, a sustainability appraisal undertaken, consulted upon, published and submitted is a minimum of 2 years. In relation to Medway and many other Authorities who are progressing Local Plans the timeline should be linked to the Local Plan timetable.

GENERAL QUESTIONS

Q22. What are your views on the assumptions and data sources set out in this document to estimate the impact of the proposed changes? Is there any other evidence which you think we need to consider?

There are two areas in particular where the evidence base and assumptions seem less than robust:

- Paragraph 54 refers to the 2010 National Land Use Database. These data are now significantly out of date and do not provide a reliable basis on which to estimate the impact of the proposed policy changes.
- The Equalities Statement accompanying the consultation document states on p.5, under the heading of 'Broadening the affordable housing definition', that "New affordable housing built through section 106 planning obligations only adds a small contribution to the overall affordable housing stock in England". This will vary from area to area. At a national level, out of 66,640 affordable homes of all types provided in 2014-15, 14,370 (22%) were provided through s.106 obligations¹. For North Kent, 217 out of 685 affordable homes in 2014/15 (32%) were provided through s.106 obligations²; for Dartford the figure was 85% and for Medway the figure is similar. Even at national level, 22% is not a small contribution, and these data show that for some sub-regions and individual authorities the contribution to affordable housing provision through s.106 obligations is significant. We suggest therefore a much more nuanced analysis is required to understand the differential impact that the proposed broadening of the affordable homes definition might have at local level.

The proposal to include starter homes within the definition of affordable housing is expected to seriously reduce the provision of other forms of affordable housing. This puts housing providers in a difficult position to accommodate homeless persons and those members of the community who need the support of an affordable rent or social rent property.

The consultation does not estimate the impact of the proposals on the housing stock in social rent for affordable rent nor does it discuss the impact on members of the community who need this support. One of the unintended consequences could be an increase in homelessness and residents in temporary accommodation.

Q23. Have you any other views on the implications of our proposed changes to national planning policy on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?

Similar to the point above it is very likely that those who rely on the social/affordable

¹ DCLG, Table 1000: Additional affordable homes provided by type of scheme, England; social rent, affordable rent and affordable home ownership (all s.106 nil grant).

² Live Table 1011: Additional Affordable Housing Supply 2014-15; detailed breakdown by Local Authority: aggregation of data for Dartford, Gravesham, Medway and Swale.

rent sector will be detrimentally impacted by the proposed starter home initiative.

Dave Harris
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On behalf of Medway Council

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