



Appendix 1

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Executive Summary

This is Medway Council's fourth Housing Delivery Test Action Plan (HDTAP). The Council has produced the action plan in response to the Housing Delivery Test (HDT) results published in January 2022 because delivery was below the 95% threshold. This is despite the highest rates of housing delivery in Medway's history in 2019/20 and 2020/21, at 1,130 and 1,082 new homes, respectively,

The HDT is a measure of the number of homes delivered in the preceding three years compared with the defined local housing need. It was introduced to encourage local authorities to take action to address the causes of low rates of housing delivery and it supports the government's target of delivering 300,000 new homes a year by the mid-2020s.

This action plan:

- Considers Medway's development context and reviews historic performance on housing delivery.
- Explains measures the Council has already adopted to monitor and encourage housing delivery.
- Reviews actions supporting delivery from the last plan and their impact
- Has gathered evidence on strategic sites with planning permission to understand the build out rate and the barriers that are preventing these homes being built (and at a quicker rate).
- Proposes measures to contribute to increasing the amount and speed of delivery of new housing.
- Sets out measures to continue monitoring housing delivery and understanding factors influencing delivery rates.
- Includes a timetable to review this plan.

The Council has recognised the importance of housing delivery for many years and works with stakeholders to encourage the delivery of homes. The Council is working corporately towards maximising regeneration and economic growth and this includes progressing the Local Plan and engaging with developers and landowners. The Council is also delivering sites through Medway Development Company (MDC) and via its Housing Team. The preparation of this action plan has been informed by the work the Planning Service has been undertaking on housing delivery and the preparation of the new Local Plan.

The action plan considers Medway's context. Regeneration and new infrastructure have contributed to significant change to the area. Much of the development potential is on brownfield sites and whilst successful at transforming the urban landscape, has taken longer to build out. The Council continues to promote regeneration and reuse of brownfield sites but has recognised the need to deliver greenfield sites outside the current Local Plan boundaries to meet the identified local housing need.

The report also considers how Medway will perform in future HDTs based on the housing trajectory published in the Council's Authority Monitoring Report (AMR) 2020/21. This shows that there is the potential to pass the HDT by 2025. However, this recognises the need to have a sustained increase in housing delivery to achieve this, as is currently proposed by developers. The early signs for 2021/22 is delivery will remain above 1,000 units so the significant increase seen in the last two monitoring years will be sustained. The trajectory in the last AMR did reflect a slowdown in the number of homes in the next couple of years to reflect the impact of Covid-19 and uncertainty about how that would affect delivery in the medium to long term. However, it is clear that the efforts to permit larger greenfield sites has left Medway well placed to continue delivering new homes, even if at a slower rate and this has contributed to a step change in the number of homes being delivered each year.

The report details progression of actions in the 2021 Action Plan, as well as other activities the Council has undertaken this year that will support housing delivery.

There is a detailed examination of areas of direct and indirect influence. It reviews the internal processes in the Planning service, covering both policy and development management. The report then looks at wider factors affecting housing supply and demand. It considers how the Council can encourage leadership, improve the attraction of Medway and other possible entrepreneurial actions it could take to promote the housing investment in the area.

In many of these areas, the Council has been proactive in taking steps that help promote housing delivery. There is much to be applauded and continued but we have also identified some areas with scope for improvement where the Council can take action to address under delivery of housing. These are included in section 4 of the report. Some actions will see immediate results. Others will take longer to show impact but are essential for medium to long term delivery.

Key conclusions from the analysis

There has been an increase in the number of planning permissions for dwellings in recent years, but this is still not at a high enough level to deliver the level of identified local housing need. The defined local housing need has increased significantly, and the Council has taken action to permit more schemes including larger schemes on greenfield sites. This is now having a positive effect on the number of new homes being built. This needs to be sustained to increase the rates of delivery and pass the HDT in coming years.

A key action is publication of the new Local Plan as it will provide the spatial strategy to meet the local housing need. There has been detailed work carried out on site assessment to demonstrate that development can be delivered, is viable and can come forward in a timely way to provide for a five-year housing land supply (5YHLS). This is shown in recent Strategic Land Availability Assessments (SLAA) and Brownfield Land Register.

The analysis shows that communication with stakeholders through ongoing engagement activities is an important part of Medway's influence over the delivery of housing.

There is a breadth of work happening across the Council that will have a positive impact on the delivery of housing including within the Planning service. The delivery of projects such as the Future Hoo HIF strategic infrastructure programme will ensure the Council can continue to meet its own regeneration aspirations and housing delivery whilst supporting the development sector to continue delivering in Medway.

1 Introduction

Background

- 1.1 This Action Plan has been prepared as the country tries to return to normal after two years of the Covid-19 pandemic but with a backdrop of rising prices, inflation and cost of living crisis and war in Ukraine. Although the action plan responds to past activities in the housing market, the situation over the last couple of years and anticipated conditions in the near future are significant for this work. This action plan considers some of the impacts on the housing market resulting from the Covid-19 pandemic including the strong demand for housing. It also aligns to the Council's plans to secure the economy and investment in infrastructure. There have been very recent significant policy announcements and proposed legislative changes, as part of the Queen's Speech, during the writing of this action plan as well as changes last year to policy with a revised National Planning Policy Framework in July 2021. Delivery of housing is still a key policy ambition of the government alongside their levelling up agenda.
- 1.2 The Housing Delivery Test sits within the context of the government's agenda to boost the supply of housing. The requirement on local planning authorities to produce an action plan arose from updates to national planning policy in 2018. The Council must report on its analysis of the reasons why rates of housebuilding have not met the levels of identified housing needs for the area, and set out actions to address these issues, with the aim of boosting the delivery of housing. This is the fourth action plan that the Council has produced.
- 1.3 The government had a highly publicised target of delivering 300,000 new homes per year by the mid-2020s and it was with that as a backdrop that the Housing Delivery Test (HDT) was introduced. The target required a significant boost in the number of homes to be built and an increase in the speed at which they were coming forward. The Letwin ['Independent Review of Build Out Rates'](#) was commissioned to investigate further the factors influencing housing delivery, particularly the delays between planning approvals and new homes being built. Discussions have continued on the topic of planning and housebuilding, with a consultation ['Planning for the future'](#) in August 2020. This was then followed by the [Levelling Up White Paper](#) in February 2022 which included a commitment to making changes to planning and has now been followed up by the [Levelling Up and Regeneration Bill](#). At the time of writing, the bill is in an early draft phase so the detail could be amended during its progress through parliament, secondary legislation will be required for some of the detail and further policy documents are expected.
- 1.4 The government has introduced a number of measures and reforms to the planning system intended to deliver more housing, improve housing affordability and remove barriers to development. Local planning authorities (LPAs) are challenged to be more

proactive in increasing the speed and quantity of housing supply to meet the identified housing needs of their local area. This forms part of a complex picture of interdependent issues relating to the supply and delivery of homes that will be explored as part of this action plan alongside issues outside of the Council's direct control. The Council recognises that the HDT is only one part of this complex range of factors that impact on housing development and sees this action plan as intrinsically linked to wider plans and programmes.

- 1.5 The [National Planning Policy Framework 2021](#) (NPPF) sets out that plan makers should maintain a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. The policy framework introduced the 'Housing Delivery Test' (HDT) in support of housing delivery. Further detail is provided in national [Planning Policy Guidance](#) (PPG). The HDT acts as a monitoring and performance tool to demonstrate whether local areas are building enough homes to meet their housing need.
- 1.6 The HDT results are published annually and have been published four times to date, in February 2019 and 2020 and January 2021 and 2022. It is a backward looking measure that compares the number of new homes delivered over the previous three years with the authority's housing requirement. Full details of the method of calculating the HDT are specified within the [Housing Delivery Test Rule Book](#) and the PPG. As the adopted housing requirement in Medway is more than five years old (through the Medway Local Plan 2003), the Council's HDT has been assessed against the minimum annual local housing need figure calculated using the 'standard method', as defined by government data.
- 1.7 A series of sanctions will apply when the test results show that housing delivery fell below the housing requirement in those three years, and this will depend on the level of shortfall. The sanctions apply in all years the HDT measurement
 - Below 95% - an action plan to be published within six months of the test results.
 - Below 85% - 20% buffer added to 5 year supply and an action plan.
 - Below 75% - a presumption in favour of sustainable development, a 20% buffer and an action plan.
- 1.8 Medway achieved a result of 67% in January 2021, up from 55% in the previous year and in the mid 40s in the first two years. This means that all measures will continue to be imposed. Therefore, Medway is required to create an action plan, apply a 20% buffer to the five year housing land supply and apply a presumption in favour of sustainable development when determining planning applications. This will apply until the next HDT measurement. The Head of Planning has provided training to members on the implications of the Presumption in Favour of Sustainable Development in relation to planning decisions.

The purposes of this document

- 1.9 The Council will use this action plan to assess the causes of under delivery of housing in the previous three years and identify actions to increase delivery in future years, as set out in the NPPF and following guidance in the PPG.
- 1.10 The Council has positively engaged in the process of preparing a HDT action plan, seeking to use targeted research to identify effective measures to improve the delivery of housing. Medway Council officers have engaged with Planning Advisory Service (PAS) guidance and workshops to help prepare the first two action plans and workshops more recently to understand the implications of failing to meet the 75% HDT threshold that means presumption in favour of sustainable development applies when determining planning applications. This has ensured a robust and comprehensive approach. The Head of Planning has given training to members of the Planning Committee and officers on this issue. The Council has also continued to promote the delivery of housing as a key issue for Medway. This is demonstrated through the Council's lead on development and regeneration schemes, its marketing and inward investment work, and engagement with the wider development sector. This helps to maintain high levels of engagement with senior members and managers.
- 1.11 The Council recognises that this is an ongoing process that will evolve especially in light of other activities such as publication of the new Local Plan, and further updates to government policy. There will be subsequent versions of the action plan and they will respond to actions within this plan as they are implemented and monitored. The evidence presented here is not a final or complete picture and will be built upon in future action plans. The HDT action plan should not be seen as a 'stand-alone' document, but rather linked to wider ambitions, plans and programmes in Medway.
- 1.12 This action plan:
- Considers Medway's development context and reviews historic performance on housing delivery including potential root causes of under delivery against housing targets
 - Explains measures the Council has already adopted to monitor and encourage housing delivery
 - Reviews actions supporting delivery from the last action plan and their impact
 - Has gathered evidence on strategic sites with planning permission to understand the build out rate and the barriers that are preventing these homes being built (and at a quicker rate)

- Proposes measures to contribute to increasing the amount and speed of delivery of new housing
- Sets out measures to continue monitoring housing delivery and understanding factors influencing delivery rates.
- Includes a timetable to review this plan.

This is in line with [Planning Practice Guidance](#) which states that the action plan should “identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.”

Preparation of the action plan

- 1.13 Medway Council has recognised the importance of housing delivery for many years and a priority within the corporate [Council Plan 2021 to 2022](#) is ‘maximising regeneration and economic growth’ with a key outcome being ‘delivering new homes to meet the needs of Medway’s residents’. This identifies actions including progression of the Local Plan; working with landowners and developers to enable housing development, and the delivery of Housing Infrastructure Fund Bid. The Council is working corporately towards these outcomes and progress is monitored through the delivery of service plans. These ambitions are being realised, with Council owned sites in Chatham, Gillingham and Strood providing for new homes and regenerating our town centres.
- 1.14 The preparation of this action plan has been informed by work the Planning service has been undertaking on housing delivery and the preparation of the new Local Plan, in particular assessing sites suitable for the allocation of housing within the draft plan. It has made use of the development monitoring process that is reported annually in the [Authority Monitoring Report](#) (AMR). The annual AMR work includes the phasing of housing trajectories which is informed by discussions with developers on their planned delivery rates. This was carried out last year in the context of Covid-19 lockdowns, and the Council sought specific information from developers on any anticipated impacts on the timing and phasing of housing delivery. At the time of preparing this report, information is being collated for the next AMR by way of site survey and contact has been made with developers on all sites with permission for 10 or more dwellings and will be used in the AMR to be published in December 2022. This work informs the trajectory of housing delivery and is also used to assess reasons for under delivery.
- 1.15 To gain a better understanding of what barriers might be acting to deter/delay housing delivery within Medway, officers have been engaging with individual site developers in addition to ongoing discussion between the Head of Planning and developers of large

sites. Ongoing monitoring of the implementation of planning consents has helped identify site specific issues that create barriers to development.

1.16 The Council has looked at its internal processes in the Planning Service, covering both policy and development management. This report then looks at wider factors affecting housing supply and demand. It considers how the Council can encourage leadership, improve the attraction of Medway and other possible entrepreneurial actions it could take. Guidance from the Planning Advisory Service has supported this process. Publications such as [Start to Finish](#) have also provided insight and areas to be considered.

2 The Housing Market and Recent Delivery

Context

- 2.1 Medway has changed significantly over the past few decades, with regeneration and new infrastructure contributing to the development of a modern city. It is a diverse and complex area. Medway is one of the largest urban areas in the south east and has an extensive rural hinterland with a third of the area designated as international or national importance for the environment, which present significant constraints on development. The urban area extends close to the borough boundaries and strategic infrastructure is under significant pressure. Much of the development potential is on brownfield sites, which although successful in transforming the urban landscape, has taken longer to build out. The area has been recovering from economic downturns over past decades and there is a positive attitude to Medway's growth ambitions. The Council is leading on the redevelopment of several urban regeneration sites. Although rates of housebuilding are below the level of identified housing need, there was a dramatic increase in the recent years in the net number of homes delivered from 647 in 2018/19 to 1,130 in 2019/20 and 1,082 in 2020/21. This signals a change in the progression of sites in Medway and the Council is confident that the increased level of delivery will be sustained in 2021/22.
- 2.2 There are a complex range of factors that influence housing delivery, which are acknowledged in government policy documents and guidance. The Letwin ['Independent Review of Build Out Rates'](#) is primarily focused on large sites of 1,000-15,000 units and although this may not seem immediately relevant to the sites that are currently being delivered in Medway, it does consider a range of factors that will influence build out rates. These are factors that Medway is aware can affect the delivery of sites of all sizes and the analysis will give context to some of the larger sites that will come forward in the future. The Council has also reviewed Lichfield's' paper [Start to Finish](#) which provides analysis on build out rates and factors that might affect the pace of delivery.
- 2.3 The housing market is complex and housebuilding rates are influenced by a wide range of factors. The Council acknowledges that there are areas, such as access to development finance and mortgage rates, rising costs of materials and supply chain issues where it has no influence. This action plan therefore focuses on those factors where the Council can have an impact. These include assessing internal work on planning policy and development management, and corporate work in regeneration, development and place making.

Past performance on housing delivery

2.4 The latest HDT measurement was published in January 2022 (2021 series) and showed that rates of housebuilding delivered in Medway in the preceding three years were 67% of the defined housing requirement, calculated using the method in the Housing Delivery Test Rule Book.

	2018-19	2019-20	2020-21	Total	Percentage result
Number of homes required	1,672	1,550	1,111	4,332	67%
Number of homes delivered	647	1,181	1,067	2,895	

Table 1 Medway's data taken from the published measurement

2.5 There was a significant increase in the number of homes delivered in 2019-20 compared with the preceding two years and this was sustained in 2020-21 and they are the highest levels of delivery Medway has had since its inception in 1998. It looks as though the increase will be sustained in 2021-22, but survey work is ongoing so it is not possible to confirm exact figures at this stage. There is likely to be a number of reasons for the increase but it is significant that this coincides with the early phases of delivery of a number of sites outside the current local plan boundaries. Greenfield sites such as Street Farm, Hoo, Walnut Tree Farm, Hoo, land west of Elm Avenue, Chattenden, land at Town Road, Cliffe Woods and land south of Stoke Road, Hoo all completed their first units within two years of being identified for monitoring purposes. The strong delivery of these sites shows market confidence in delivering sites on the Hoo Peninsula. Delivery of brownfield sites such as Colonial House, Chatham, Kitchener Barracks, Chatham, Chatham Waters, and Temple Waterfront, Strood have continued, but at a slower pace and they also initially took longer to commence from the point of being identified.

2.6 As Government has promoted its agenda to boost housebuilding, it has introduced reforms to the planning system, and the white paper has been followed by the Levelling Up and Regeneration Bill published the day of the Queen's Speech, which includes proposed amendments to the planning system. A couple of years ago there was a long-awaited announcement on the method for calculating local housing need, following consultation, and this saw the 'standard method' confirmed. In the preceding ten years, the Council had seen significantly different levels of defined housing need. This created uncertainty and the increases were dramatic. When the Council submitted its draft Core Strategy for examination in 2012, the housing target was 815 homes a year. At the start of the new Local Plan process, the Council commissioned

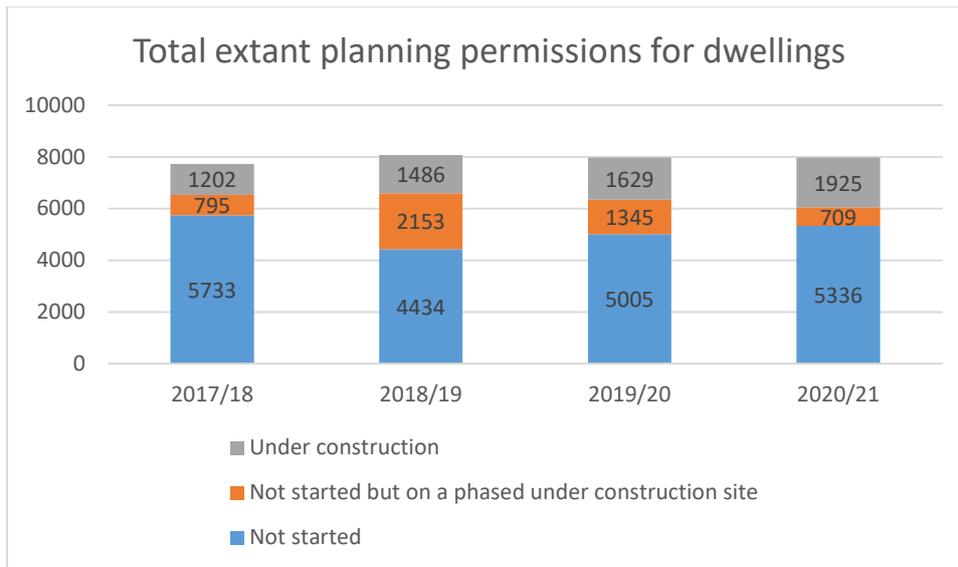
an assessment of housing needs in 2014 that concluded an annual need for 1,000 dwellings. It increased with the introduction of the standard method and it is now 1,675 dwellings per year needed to meet the five-year housing land supply but increases to 2,010 when a buffer of 20% is added due to past under delivery identified by the HDT. There are slight variations each year as the standard method uses the affordability ratio and the calculation of need is adjusted in line with this and it marginally affects the overall number. The affordability ratio worsened this year which means the number of homes needed has increased and it is expected to be similar next year. The new Bill has proposed changes to five-year housing land supply for authorities with upto date plans, but it is too early to know exactly what amendments will be made the legislation as it progresses through parliament, and it is likely it will take a considerable amount of time for associated secondary legislation and policy to be issued. The Council commissioned an [assessment of Local Housing Need](#) as part of the evidence base for the new Local Plan.

2.7 The following table shows the number of dwellings under construction and those with planning permission but not yet started upto the end of 2020/21.

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Extant permissions not started (net)	5491	6494	6170	6587	6350	6045
Extant permissions under construction (net)	760	805	1202	1486	1629	1925
Total	6251	7299	7372	8073	7979	7970

Table 2: number of dwellings under construction and not started at end of monitoring year 2019/20

2.8 There are some sites that fall into both categories, for example, when the site is phased and not all phases are under construction. There are about twenty large sites that have units in both categories including Rochester Riverside, land north of Peninsula Way, Kitchener Barracks and former Chatham Golf Centre. The chart below includes an additional category of units that are not started but are on a site, or part of a site, that is under construction (and only includes parts of a site that have an implementable consent.)

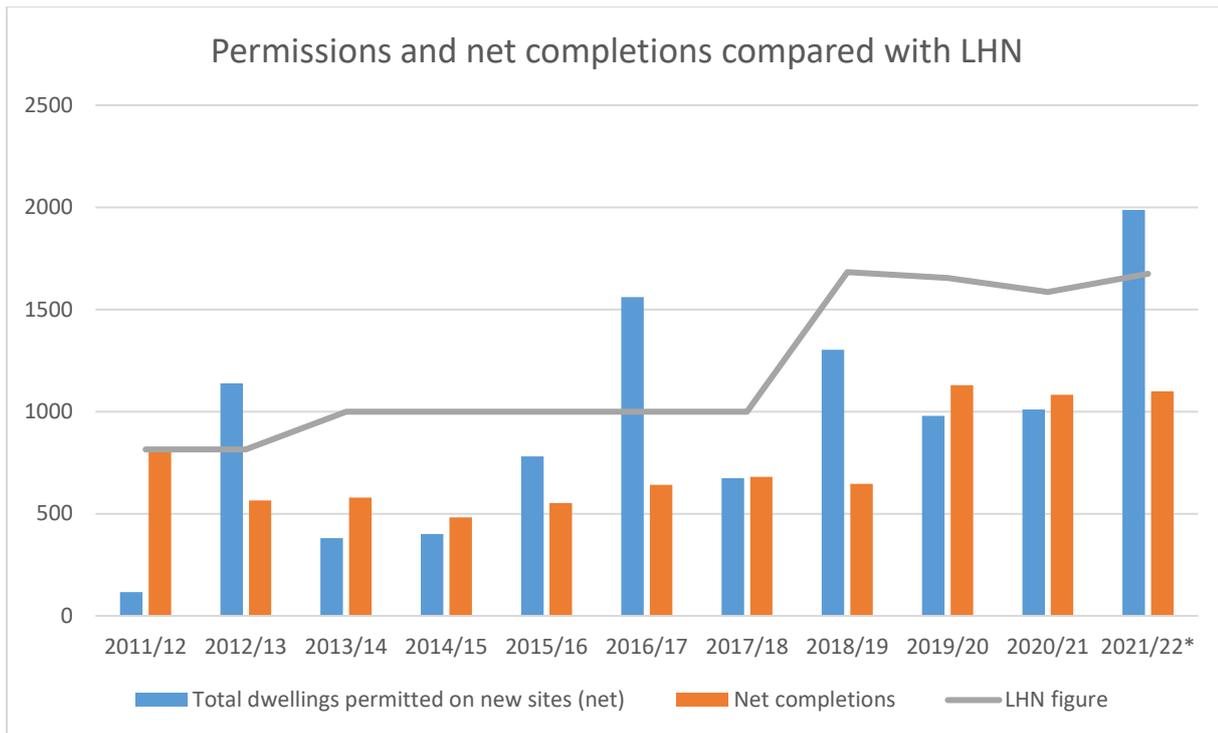


2.9 As shown in the graph above, for 2020/21, this subcategory is 9% of all extant permitted dwellings and 13% of not started extant permitted dwellings. In 2018/19, there was a significant increase in the number of units in the subcategory but it has dropped back over the last two years to the 2017/18 level. However, the number of starts of units under construction is the highest it has been in the last four years. This could reflect the ongoing trend of increased delivery in Medway. It was expected that there would be a dip in completions about six months after sites shut down during the first national lockdown but there was also a delay on starts so this could also reflect sites getting back to full speed.

	2012/ 2013	2013/ 2014	2014/ 2015	2015/ 2016	2016/ 2017	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	2021/ 2022*
No of permissions on new sites	68	77	91	81	109	114	104	116	102	133
Large /Wind fall dwellings (net)	1069	277	294	694	1447	543	1217	846	912	1886
Small dwellings (net)	70	103	107	87	113	132	86	134	99	102
Total dwellings permitted on new sites (net)	1139	380	401	781	1560	675	1303	980	1,011	1,988

Table 3 new permissions *2021/22 data is provisional

2.10 On average, the number of new homes being permitted has increased in the last five years totalling 5,957* dwellings compared with 4,261 in the preceding five years. However, there have not been enough permissions granted to meet the current high level of local housing need. Some of these new permissions will be on sites that have had a consent in the past or is being reconfigured but this is to be expected. It inevitably takes some time to increase the pipeline in response to the increased level of LHN. The graph below shows the number of newly permitted dwellings each year compared with net completions and the local housing need at the time (including provisional figures.)



2.11 There is progress on key regeneration sites but there is also growth in smaller urban sites and in suburban and rural locations. In advance of the new Local Plan and the challenges set by Government to boost housebuilding, the Council has granted planning permission for several greenfield sites, outside the current Local Plan development boundaries, to increase housing land supply (see Map 1.) The impact of the Council’s actions can be seen in the statistics for projected development. Monitoring shows an increase in the supply of land on greenfield sites in Medway in recent years, that should provide for a wider market mix and see development come forward more quickly.

2.12 Early indicators for 2021/22, suggest that the delivery of housebuilding in Medway is similar to the record levels of delivery seen in the past two years. Energy Performance Certificates (EPC) show all new lodgements to have received a certificate. This is not the same measure that the Council use, but it often closely reflects our housing completion figures. In 2020/21, it showed 1,112 new lodgements compared with the AMR net housing completion figure of 1,082 dwellings. This year, for 2021/22, they show 1,217 certificates being received for new lodgements. There should be caution over this figure as some years show a greater variance between the two and this year that is likely to be the case. The EPC data is also of limited use because it only gives a figure for the whole local authority and not specific sites or wards so cannot be cross checked against our data. However, it is an early sign that the increase in housing delivery in Medway will be sustained across three years so will have a positive effect on next year’s HDT result.

External influences

- 2.13 There have been a series of unprecedented events in the last few years that are all considered exceptional and will have had an impact on the delivery of housing but are outside the Council's control. The Brexit vote resulted in a period of uncertainty until the withdrawal agreement was finally settled and Britain stopped being a member of the European Union. Once the transition period ended, there were supply chain issues that were not resolved before the Covid-19 pandemic started shortly after. These issues have been ongoing as the world has grappled with the pandemic and associated lockdowns both nationally and internationally. The blocking of the Suez Canal caused further disruption. China is still imposing Covid-zero lockdowns, and this is also causing disruption to supply chains. Inflation was increasing with the rising cost of oil and gas and the invasion of Ukraine has exacerbated this situation. This has resulted in the highest inflation seen in 40 years and nationally there is a cost-of-living crisis. It is likely that Ukraine will be unable to export easily, if at all, which will cause international food shortages and impacts on the supply of materials. The Bank of England has started to raise interest rates which have been at historically low levels since the financial crash in 2008. This does not cover the scale of influences and changes that will have impacted the supply of housing or by how much but it does give an idea of the pressures that the sector will have faced.
- 2.14 Developers have reported that conditions for delivering their projects is difficult at this time and this will have been caused by wider national and global issues. They have cited supply chain issues, skilled worker shortages and increased costs. They are having problems in securing contracts to build schemes. Some have needed to redesign schemes, refinance, and seek new approvals from their backers. As a result, schemes will have been put on hold or delayed and this will effect the overall delivery of homes.
- 2.15 These issues have not dampened the housing market so far but there are recent signs that growth might have started to slow. House price increases have been significant since the end of the first Covid-19 lockdown, partly influenced by reductions in stamp duty in 2020/21, a desire by buyers to seek more space for working from home and amenity space. It is too early to know yet how much increases in the cost of living and interest rates will impact the housing market. A slow down has been predicted at a number of junctures but has not yet materialised, although it has been reported that growth in construction has slowed in recent months. The rate of delivery in Medway has been its highest since its inception, despite the challenging circumstances the development industry has faced over the last few years.

Housing market conditions

- 2.16 Government guidance and PAS advice on the preparation of the HDT action plan directs councils to look at wider factors that contribute to housing supply and demand. These include factors specific to Medway, but also national factors. This section firstly considers factors driving supply, and then looks at areas influencing demand locally.
- 2.17 The [Medway local housing needs assessment 2021](#) is part of the evidence base for the new Local Plan. It has assessed the specific characteristics of housing need in Medway, including the need for affordable housing and specialist accommodation.
- 2.18 Evidence from the development and property sectors gathered through meetings is that the property market in Medway has been buoyant over the last year, after the first lockdown. This is against the backdrop of the Covid-19 pandemic, the UK leaving the European Union and inflationary pressures. Work on the Local Plan viability assessment confirms that the market is perceived to be strong and it is a highly desirable place to develop housing. This is supported by an increase in the number of new homes delivered between 2019 and 2021 and it is anticipated this was sustained in 2021-22. There are a number of new developers entering the Medway market as well as existing developers continuing to develop sites. Some developers are reporting very strong demand for their products with lots of units selling off plan and on some smaller sites the whole development being fully sold half way through the build.
- 2.19 The housing affordability ratio in Medway, as of March 2022 was 8.72, meaning that the average property in Medway costs nearly nine times the average annual salary. This is an increase from last year, meaning homes in Medway are more expensive than they were. The change is a result in a decrease in average earnings, combined with an increase in house prices. Housing in Medway has a similar affordability ratio to the national ratio (9.05), but more affordable than across Kent (11.16). NLP's report into build out rates in the housing market, '[Start to Finish](#)' uses housing affordability ratios to define higher demand areas and link this to stronger markets. It concludes that 'stronger local markets have higher annual delivery rates.' It recognises that this is a broad brush measure but it is a key part of assessing local housing need using the government's standard method so worth consideration. It also recognises that higher demand areas generally have larger sites so this could be the influencing factor.
- 2.20 Although Medway has a buoyant market, average sales values are lower than England, Kent and the south-east. Prices in Medway are just below the average paid in England, £286,590 compared with £297,524. This compares with £354,720 for Kent and £384,966 in the south-east. The UK House Price Index, based on sales data from HM Land Registry, shows an increase in average house prices in England of 9.9% in

March 2022 compared with the previous year. This is similar to the previous year's increase of 8.6% from March 2020 to March 2021 but both years are a significant jump from the 2.5% increase in the preceding year. The increase in Medway has been higher than the average increases in England at 11.5% this year but lower than Kent at 12.6% and the south-east at 11.7%. There are marked variations in residential property prices across Medway so for developers it is possible to achieve higher values in certain areas within Medway and also in other areas in Kent. The increase in values has been greater for detached and semi-detached houses compared with terraced houses and flats and maisonettes and this could be the trend seen during the pandemic of people wanting more space to allow for home working and personal outdoor space.

2.21 The value of land should reflect the lower sales values that can be achieved locally. Again, there is a marked variation in land values across Medway. The viability of sites can be part of the discussions at application stage and as noted, there has been work on a viability assessment undertaken for the Local Plan. There could be over inflated land values but other factors such as high cost of materials and shortages of skilled workers can push up construction costs. However, on some measures, the lower house prices in Medway are considered a positive factor in supporting the housing market as properties are attractive to both local residents and those looking to move to a more affordable area.

Housing Delivery Test projections

2.22 The [NPPF](#) requires local planning authorities (LPAs) to apply a presumption in favour of sustainable development to decision making if the development plan policies are out of date unless there are other material considerations to outweigh this. It also requires LPAs to apply this if their delivery falls below 75%. This can change in future years if the level of delivery increases to the level of need identified and the increase is sustained, as the measurement is based on three years of delivery.

2.23 Work is ongoing to deliver the new Local Plan and once adopted, decision taking will be made in accordance with the new, up-to-date, policies. As the HDT looks back, it will still apply the presumption in favour of sustainable development if delivery falls below 75%, regardless of the status of the Local Plan. Therefore, it is crucial to increase the rate of delivery to ensure the Council can deliver development that meets local needs in accordance with the policies it adopts and the overall spatial strategy set out in the Local Plan.

2.24 It is useful to project how Medway will perform in the HDT in the years to come. The following delivery predictions are based on the housing trajectory set out in the latest AMR with the calculations adjusted in line the [Housing Delivery Test Rule Book](#). The housing trajectory includes all sites with planning permission (not started/under

construction), as well as Strategic Land Availability Assessment (SLAA) sites and a figure for windfalls. The delivery figure has been adjusted by five months in the most recently published HDT measurement to account for the closure of sites in the first pandemic lockdown and the disruption this caused to the house building industry.

2019	2020	2021	2022	2023	2024	2025	2026
46%	55%	67%	84%	87%	86%	98%	108%
1st action plan and 20% buffer	2nd action plan and 20% buffer	Action plan, 20% buffer and presumption in favour of sustainable development	Action plan and 20% buffer	Action plan and 20% buffer	Action plan and 20% buffer	No imposed measures	No imposed measures

Publication year (November – February)	Year 1	Year 2	Year 3	Total number of homes required	Year 1	Year 2	Year 3	Total number of homes delivered	Result
2019	1322	1334	1672	4328	661	669	647	1977	46%
2020	1334	1672	1550	4556	669	647	1181	2497	55%
2021	1672	1550	1111	4333	647	1181	1067	2895	67%
2022	1550	1111	1675	4336	1181	1067	1396	3644	84%
2023	1111	1675	2010	4796	1067	1396	1729	4192	87%
2024	1675	2010	2010	5695	1396	1729	1798	4923	86%
2025	2010	2010	2010	6030	1729	1798	2409	5936	98%
2026	2010	2010	2010	6030	1798	24409	2281	6488	108%

Tables 4&5 - The above two tables include the results published in the HDT measurement 2018-2020. It also includes projections on delivery based on the housing trajectory in the AMR 2020/21 adjusted as per the HDT rulebook and including a 20% buffer. From 2019 onwards, the number of homes required is based on the minimum annual LHN which is calculated with a base date of 1st April each year and the calculation uses the affordability ratio of the previous calendar year. This means the number of homes required will change slightly in each financial year. The LHN may be subject to change in coming years with adoption of the local plan and its annual housing targets.

2.25 The projected results do show that Medway will pass the HDT in 2025 if it delivers the number of homes set out in the current housing trajectory. This is two years later than projected in last year's action plan. Although Medway achieved its highest delivery in 2019/20, with a massive jump from 647 to 1,181 units, the trajectory was reviewed, in line with monitoring processes, and this has meant projected delivery has been

pushed back. This was mainly due to the Covid-19 pandemic which made it difficult to assess future delivery, both for the Council and developers. In 2020/21, Medway saw its second highest year of delivery, only just behind the previous year but this was lower than the level in the trajectory. The projection will be updated later in the year when a final net completion figure is available, so the delivery is based on the housing trajectory in the 2021 AMR. It is likely to be a similar picture this year, in that, the delivery will be strong, but not as high as predicted so the projection will change. The HDT result is normally based on the previous three years housing delivery so the increases in the number of homes being delivered needs to be sustained and exceeded. The five-month adjustment to the HDT measurement means that three years of delivery has been compared against 2 years and 7 months of local housing need. This reflects the disruption of the pandemic and Medway was likely to have performed even better if the pandemic had not happened, but this would have been assessed against a full three years of delivery. The entire adjustment will remain for the 2022 measurement and then will reduce in 2023, with no adjustment in 2024. It is also worth noting that last year's measurement includes one year of lower delivery figures and the 2022 measurement is expected to include three years of delivering in excess of 1,000 units per year.

- 2.26 The impacts resulting from the Covid-19 pandemic and other exceptional and unprecedented events are issues that will affect the housing market nationally and all local planning authorities will need to plan how to manage the gap in housing delivery. Even though there are measures local authorities could introduce to support the sector in the recovery, it is not wholly within their control. The government will need to introduce measures to support the development sector if it continues to aspire to 300,000 new homes per year by the middle of this decade, as it has been done previously. Reductions to stamp duty were introduced in 2020, extended into the following spring with a reduction in the qualifying amount applying from July to September 2021. There is some continuing support for first time buyers with Help to Buy Equity loans but only until October 2022, brought forward from March 2023. Lifetime ISAs also continue until October 2022 but Help to Buy ISAs have already been withdrawn. The government has launched 'First Homes' as a new affordable housing product and they are initially becoming available as part of a government backed early delivery programme that runs until March 2023 with more expected through the planning system.
- 2.27 The housing trajectory will be reviewed as part of existing work programmes including annual monitoring and evidence base work for the new Local Plan. This will include consideration of the impacts of exceptional events that could not have been predicted before the trajectory was formulated. Developers and landowners of large and strategic sites have been asked to provide up-to-date estimates of their expected housing delivery as part of the annual monitoring of permitted sites.

3 Root Cause Analysis

Planning Policy and Development Management Processes

- 3.1 This is a wide ranging section of the action plan. The analysis includes consideration of the factors that have contributed to housing delivery rates in past years in Medway, and what is anticipated in coming years. We review the actions taken within the Planning service to support housebuilding, and wider considerations of supply and demand factors. The Council has started its work on the HDT action plan with a review of its Planning service to assess areas impacting on rates of housing delivery.

Medway Local Plan

- 3.2 The Council is preparing a new Local Plan. Progress has been delayed, but a comprehensive evidence base has been collated and there has been ongoing work on site assessment and the development strategy. The preparation of the plan will address the significant uplift in housing needs and consider the range and mix of housing needs to ensure that there is a balanced housing offer to meet the communities' needs. Detailed work has been carried out on site assessment to demonstrate that development can be delivered, is viable and can come forward in a timely way to provide for a five-year housing land supply (5YHLS). This has included identifying key constraints and means of mitigation where appropriate, such as through the provision of infrastructure.
- 3.3 The context of the increased housing needs for 1675 homes a year is fundamental to the production of the plan and the direction taken to growth. The Council has carried out comprehensive iterative assessments of potential housing land availability and suitability and collated a wide evidence base to ensure that the proposed development strategy can be delivered and effectively meet the area's growth needs. A technical evidence base is being developed and has included a number of key work streams that will inform the plan. The assessments most relevant to this action plan include the [Local Housing Needs Assessment](#), [Strategic Land Availability Assessment \(SLAA\)](#), [Strategic Transport Assessment \(STA\)](#), [Infrastructure Delivery Plan \(IDP\)](#), and [Viability Assessment \(VA\)](#). They will help inform the allocation of housing over the period as well as policies relating to the types and mix of housing being promoted, and the threshold and level at which affordable housing is required.
- 3.4 The plan will demonstrate the long term strategy for development in Medway and it will give certainty to developers on preferred housing locations and phasing. The Local Plan is critical to securing the delivery of housing in Medway, and the Council sees the new allocations for residential development as making one of the largest contributions to boosting housebuilding in Medway.

- 3.5 In advance of a plan being in place and given the government's emphasis on the planned system, the delays in Medway's local plan preparation may have impacted on delivery rates in recent years due to its complexity.

Strategic Land Availability Assessment

- 3.6 This is a key tool in providing for housing land, and the Council has considered the widest range of potential sites for development. The first SLAA was published in November 2010, with eight subsequent reviews and reports, the latest being published in December 2019. These were supported by 'call for sites' exercises in 2008/2009 and 2014 for residential development. Since then the Council accepted new sites until the end of the Regulation 18 Development Strategy consultation in 2018. Further updates have been sought from developers and site promoters in Spring 2020.
- 3.7 This assessment forms part of the evidence base for the Local Plan and gives the Council a good understanding of the land available for development. The iterative process has provided for a comprehensive and robust review of potential development land. The information collected through this work has informed the site selection process for the draft Local Plan, together with the Sustainability Appraisal and Habitat Regulations Assessment.
- 3.8 The Medway SLAA 2019 assessment found an increased supply of potential development land that is suitable, available, and achievable, an increase of 282% compared with the 2018 assessment. This was at a scale to meet the scale and range of growth needs identified for the new Local Plan period. It reflected the certainty provided by the successful HIF bid to overcome transport and environmental constraints, supporting potential growth at sites on the Hoo Peninsula; plus delivering an urban regeneration agenda brought about by further investment from the Council and its development company, Medway Development Company (MDC).

Brownfield Land Register

- 3.9 The regeneration of brownfield sites forms the core of Medway's development strategy. The Council supports the effective use of land that has been previously developed to promote sustainable development and meet the wider objectives of ambitions for Medway's growth. As well as seeking investment to bring forward key regeneration sites, the Council promotes greater awareness of the availability of brownfield sites for development.
- 3.10 The Council was a pilot authority for the introduction of the Brownfield Land Register, promoting its regeneration ambitions. The purpose of the register is to encourage use of previously developed land, and help boost the supply of housing. The register is updated annually, and the current register published in January 2022, has sites listed

with a minimum number of homes to be delivered at 2,178. This is a decrease on 2021's 2,298 but this is still at an increased level when compared with 2019's 783. Of these, a minimum of 879 dwellings had permission and 159 were pending a decision at the time of publication and these form part of the development pipeline (see Map 3 for the split of all sites by land use in the pipeline). There are another 1,140 without permission that will be included within the trajectory of sites to be allocated within the new Local Plan. These are in addition to the large sites in Medway's regeneration programme which are not included within the register.

- 3.11 The Council has not implemented the Permission in Principle in connection with the Brownfield Land Register. This reflects knowledge of heritage and environmental impacts that are often key considerations in bringing forward such sites. The Council will keep this position under review, but it is not considered that this decision has impacted significantly on build rates in Medway in recent years.

Stalled and dormant sites

- 3.12 The Planning Service has a dedicated Implementation Officer whose role includes following up on unimplemented planning consents. This acknowledges that there are consents for about 8,000 homes in Medway where development has not yet started or is under construction. The Council targeted work to assess if there are aspects of the planning system that it can review to encourage development to come forward. There are a few notable stalled sites but these are generally restricted by matters that fall outside planning control. There has been ongoing dialogue with the developers of these sites to investigate whether there is anything that can be done to assist them in restarting the development. There has been progress on some sites, applications to alter the layout and number of units on other sites but a few other sites where progression seems to have stalled. There are also a few sites that were unable to make use of the extension of time to implement their planning consent before end April 2021.
- 3.13 Developers are also being contacted individually for dormant sites and invited to enter into a dialogue about how to progress the site. This has been met with a mixed response with some willing to share information and others not responding to contact.
- 3.14 For many the issues are not planning related. For small to medium sized sites it is often because the developer needs to secure finance or complete other projects first to enable cash flow. Some permissions have been in the pipeline for a long time but this is a minority.
- 3.15 More support for SMEs including peer support could help them find ways of overcoming some of these issues. The Council could also look at ways to help the landowners of these sites to promote them more effectively.

3.16 In general, it is acknowledged that stalled and dormant sites have had a likely impact on delivery rates in Medway in recent years, which has not been accounted for in the level of permissions granted.

Development briefs

3.17 Development briefs and masterplans can be useful tools to boost market confidence and promote development opportunities. Medway has a well established urban regeneration programme and much of the development has taken place on brownfield sites such as Gillingham Waterfront and Temple Marsh, and is coming forward on sites such as Rochester Riverside. The Council recognises that regeneration sites can be complex to develop. The Council supports measures that can de-risk sites and provide greater certainty to the market. It has led on the preparation of supplementary planning documents to promote available development opportunities and set out additional guidance on design.

3.18 Strood Waterfront was an allocation in the 2003 Local Plan but has yet to be developed. The Council has taken on the role in bringing forward this site for development. A development brief was adopted in 2018 and promotes growth opportunities on strategic sites in Strood, which could transform the centre and waterfront site. The Council has now delivered key infrastructure improvements, such as flood defence works to enable development, and is now working towards bringing the site forward for development.

3.19 In June 2018, the Council also adopted the Chatham Interface Land development brief to update guidance on a key regeneration site that sits on the boundary of Chatham Historic Dockyard and Chatham Maritime. This promotes opportunities for residential led mixed use development. The Council is working on bringing forward this site with Homes England.

3.20 Town centre masterplans for Strood, Chatham and Gillingham to identify and encourage re-development in response to structural changes in retail were adopted in December 2019. These will support ongoing regeneration of these areas and will also help increase the attractiveness of the area to developers.

3.21 The Council intends to increase the number of development briefs produced linked to allocations in the new Local Plan. Further work is now ongoing in Chatham as part of Historic England's Heritage Action Zone programme. The Council is also preparing a Hoo Development Framework to support a proposed strategic growth allocation on the Hoo Peninsula in the new Local Plan. The Framework will set out a strategic masterplan and key principles to guide growth. It is acknowledged that such strategies do not necessarily, on their own, speed up the delivery of large sites, but do provide certainty in development coming forward. The work involves engagement with the

development sector, service providers, local communities and wider stakeholders to address key issues to provide for sustainable and viable development. The Council is involved in a government supported design codes project in Chatham which will engage with developers and also provide more certainty to them for this area and supports key town centre strategies.

Efficient decision taking in development management

3.22 Timely decision making on determining planning applications for housing is part of the wider process of maintaining housing supply. Service performance is reported to Planning Committee quarterly and includes benchmarking against similar unitary authorities. During the last year, the report has shown that determination of planning applications has exceeded government targets for major and minor planning applications, both of which include housing development applications. The service is also above national average for determination of major and minor applications

3.23 The authority uses Planning Extension Agreements (PEAs) in negotiation with applicants to ensure that better quality outcomes can be reached within timescales agreed by both parties. This means that some applications do take longer than the statutory time frame, but Medway has a good record in determining applications within an agreed timescale.

3.24 Medway Council's development management function is not seen as a barrier to development taking place in a timely manner.

Pre application service and presentation to members

3.25 The Planning Service provides a comprehensive chargeable pre-application advice service. The charges are used to ensure that the process is as successful as possible. Pre-application meetings could involve a number of officers, depending on the scale and nature of the development proposed, and the Council promotes a development team approach so a meeting can include the development management case officer, urban design, landscape and/or heritage officers, and officers from other services such as highways and environmental protection. Developers and agents have recognised that this enhances discussions prior to submission of their applications and should lead to better outcomes, and that the process could address potential issues before the application is submitted and therefore support a smoother process in determining the proposal.

3.26 As part of the service, developers can choose, on significant or complex proposals, to deliver a presentation on their proposal to members early in the planning process, as encouraged by the NPPF. A presentation to members allows the applicant team to engage with elected members early so they can answer any questions, amend the

scheme and supply any extra information needed. It also gives members a better understanding of the scheme in preparation for Planning Committee with the aim of leading to fewer applications deferred or refused by the committee. Feedback from both developers and members is very positive. The Council continued to offer this service during the time of the Covid restrictions, through remote meetings. These have now returned to physical meetings.

3.27 Engagement by members in Medway's planning service is positive and is not seen as a potential contributor to lower housing delivery test results.

Encouraging the use of Planning Performance Agreements

3.28 The Planning Service has increased the use of Planning Performance Agreements (PPAs) over the last few years and there is an established process in place. PPAs provide for a quality assured managed programme for determining planning applications. They provide greater certainty on timetables, and the take up is very strong from developers of major schemes.

3.29 The model template created by Medway has been successful and a number of authorities, both within Kent and beyond, have adopted it. Developers have recognised the benefits of using PPAs and this is reflected in the number entered into each year. They receive a priority service and the fees are reinvested in staffing the development management teams or paying for consultants on specialist issues. There has been a slight decrease in the number of PPAs signed in the last year. The extended use of PPAs continues to be explored with the possibility of introducing them for specific consent types such as discharging of conditions. The use of PPAs is considered to have had a positive impact on housing delivery. Although there has been a slight decrease in the number signed in the last year, it is not significant enough to affect the delivery of housing applications progress as this stage.

Planning conditions

3.30 A few stakeholders have cited the discharge of conditions as a source of delay in our processes. The median amount of time to determine discharge of condition applications, for applications decided between April 2020 and March 2021, was 7.14 weeks. Research using the data standard template has shown that conditions can take a lengthy time to discharge after the original planning permission is granted with some being considerably longer than the average. It is unusual for the discharge of all conditions to be submitted as one application and this is also the case for precommencement conditions. This may be due to the differing condition requirements and their timing. It is also clear that commencement often starts on site prior to all precommencement conditions being discharged.

- 3.31 The Council recognises that this has potential to impact on housing delivery rates. It has discussed this matter with developers to understand specific concerns and gather information on examples of best practice in other LPAs. It has also looked at internal processes. PPAs include wording of recommended conditions being agreed with developers in advance of determination of their application. Other areas of exploration with developers are encouraging more details to be submitted upfront (if there are positive pre application discussions) and approving a palette of materials, therefore avoiding delay if certain materials are unavailable.
- 3.32 In 2019, all conditions were reviewed as part of an upgrade to our development management software and this included adding phasing to relevant conditions. Officers are expected to include sub-phasing on relevant cases. They also send a list of suggested precommencement conditions to the applicant for agreement prior to making a recommendation. This gives the applicant the opportunity to submit and agree the information with the application and remove the need to add the condition. Monitoring the performance of conditions and reviewing the processes for discharging conditions could be a way to address some of these delays. The Council will continue to keep this area under review as part of this action plan, and in service planning for operational improvements.
- 3.33 Developers have identified problems securing materials and equipment as being a possible area for delay and the eight weeks to determine these applications as too long because the availability of the approved materials may have changed within that time. If they need to source alternative materials, there is the potential need to submit further discharge of condition applications which will add to the delay. The Council has advised developers to submit a palette of materials for discharge to give them greater flexibility when ordering materials. Officers are also advising applicants earlier in the process of the acceptability of materials, especially when the discharge of conditions application has a number of different conditions to be discharge of varying complexity. This is seen to have a positive contribution to delivery rates.

Developer Contributions

- 3.34 Contributions are collected from developers to ensure that impacts on services and infrastructure are effectively mitigated to deliver sustainable development. The Council has not adopted the Community Infrastructure Levy and collects contributions through use of section 106 (S106) agreements. An [updated guide](#) was adopted in May 2018, after consultation, with this updated on an annual basis to reflect inflation. Triggers are agreed on a case-by-case basis and do not require all contributions on commencement or first occupation.
- 3.35 A further review will be based upon the latest Infrastructure Delivery Plan . The guide is comprehensive and provides standard templates for agreements. This provides

certainty relating to the cost of infrastructure for new developments, which developers can consider at the start of the process of securing land and developing plans. It also helps with efficient decision taking.

- 3.36 The median number of weeks to determine a planning application with a S106 was 44 weeks in 2021/22 which is broadly unchanged from 2020/21 at 43 weeks. The planning decision is issued within a few days of the S106 being signed. The time taken to determine the application post committee was 15 weeks in 2021/22 compared with 23 weeks in 2020/21 and 14 weeks in 2019/20. There can be problems getting the S106 agreed between legal teams which may explain the delay after committee. PPAs have timelines for S106 clearance and preliminary work can commence in advance of the decision being issued.
- 3.37 Lengthy delays in determining section 106 agreements may have some impact on the delivery of housing. The Council has just adopted some new procedures designed to improve the process, so it maybe too soon to see a positive impact on the determination periods of applications and the length of time taken to determine applications with a S106 was broadly similar last year compared to the previous year and prior to the pandemic. The Council continues to review the S106 process to ensure it is as efficient as possible, bearing in mind the process is complex with multiple parties involved. However, the Council is also reliant on the applicant's legal team to progress matters efficiently. The situation will be monitored in the coming year.

Planning Protocol

- 3.38 The Planning Protocol encourages collaborative working between all those delivering growth in Kent and Medway. The main aim is to deliver an environment for quality and sustainable growth in Kent and Medway to meet employment and housing needs. The protocol has four commitments which promote collaborative working between developers and local authorities. These are ensuring appropriate resources are available to deliver an efficient, high-quality planning service; promote training opportunities; communicate effectively; and increase certainty and consistency. There is scope to encourage more stakeholders to commit to the Planning Protocol.

Resourcing the Planning Service

- 3.39 Medway has had a number of senior planners in development management retire during the 18 months, as well as some others moving to new roles in the public and private sector. It has proved challenging to recruit staff of the same level of experience compared to those that have been lost. The service had a number of capable, but less experienced, planners who have been promoted into senior roles in order to build their skills so they can manage more complex applications in future years and manage the current pressures on mid sized schemes. In addition, a number of them are being

sponsored through university. It will take time for the benefits to be fully realised. The service plans to recruit some more graduate planners as well.

- 3.40 Medway looks to improve the skills and opportunities for progression for existing staff. Training staff to become planning officers takes time and is done through the apprenticeship levy so generally needs to be available locally. There is some frustration that new local courses that can be accessed using the apprenticeship levy are not being accredited by the RTPI quickly enough.

Housing Delivery Analysis: Site, Developer and Housing Typologies

- 3.41 There is an increasing diversity in developers building houses in Medway but still a reliance on volume housebuilders. Nearly 45% of completions last year were from volume housebuilders but this is thought to be similar to the national picture. In recent years Medway has been particularly reliant for significant development on a small number of volume housebuilders, in particular Countryside (St Mary's Island, Horsted Park, Rochester Riverside), Bellway (south of Ratcliffe Highway, Hoo), Redrow (Temple Waterfront, Strood, Mierscourt Road, Rainham), and Berkeley (Victory Pier, Gillingham) but this has diversified.
- 3.42 Last year 31% of new dwellings in Medway was delivered by these four developers, a reduction from 42% the previous year. However, over the last few years there has been an increase in interest in Medway with a number of other volume housebuilders and small and medium enterprise's (SME's) entering the market. This includes Persimmon, McCulloch Homes, Taylor Wimpey, Abbey Homes, Peel, TopHat, Leander Homes, Jones Homes, Quinn Estates, Linden Homes and Esquire Developments. Some of these sites are now under construction or complete

Empty Homes

- 3.43 Medway has a higher proportion of empty homes than other Kent authorities. In 2020, there were a total of 1,573 long term vacant properties. Long term is defined as vacant for 6 months or more. These homes will be vacant for a multitude of reasons, although often they are left when the owner dies and either there is no direct inheritance or those that inherit do not use or sell the property. This can often lead to them needing renovation or being left derelict. They are generally 2- or 3-bedroom dwellings with quite a few being in the terraced housing stock in Gillingham but there are some semi-detached houses and flats as well. They may be lower value homes that are costly to renovate so not viable for the owners to pursue.
- 3.44 For derelict units, section 215 notices are used to require the owner to tidy up the land and improve the external appearance of the building, but this does not guarantee the property coming back into use. The Council has a dedicated Empty Homes and

Derelict Buildings Officer who has developed a [Derelict and Empty Homes Strategy](#) that was adopted in April 2022 year.

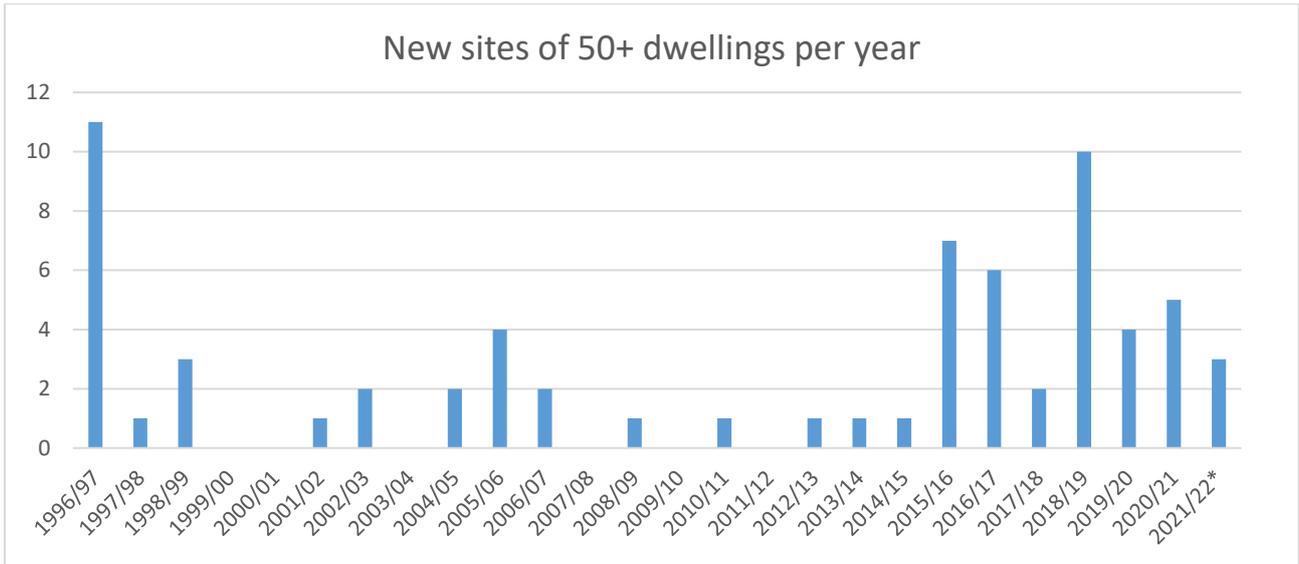
Delivery of large 1,000+ unit sites

- 3.45 Evidence from the data standard template is that larger sites for Medway have been historically slow to commence or deliver. Most notable are the strategic brownfield regeneration sites at St Mary's Island and Rochester Riverside, both complex sites with heavy contamination.
- 3.46 St Mary's Island is nearly complete and is the largest site to deliver in Medway's 20 year history and seen as a success of Medway's regeneration. The site was first identified in 1988 with an application submitted five years later. The development proposals were sponsored by the regional development agency and led by a masterplan. Permission was granted in 1996. The site can deliver 1,760 homes with 1,629 complete by end of March 2021. The site needed major remediation work at the outset as it was former defence land with heavy contamination. There were years, after the 2008 financial crisis, when the site did not deliver any new homes. Although it has taken many years for St Mary's Island to get this far it has been a major contributor to Medway's housing and a regeneration success which has resulted in a high quality and desirable area of housing.
- 3.47 Rochester Riverside was first identified as a key regeneration site in 1988. There were 73 units built in 2012 but the remainder of the site started in 2018, following the recession and review of plans. With 1,473 homes to build it could take 20 years to see all those houses built, using NLP's suggested figures as a guide. However, the developers are predicting a quicker build out than this with completion by 2029/30. This responds to the high level of demand for this award winning development. The Council secured funding from central government to carry out decontamination and site preparation works, including flood defences, which has now de-risked the site. The current scheme is a joint venture with Countryside and Hyde Property Group in collaboration with the Council and Homes England. There were 90 homes under construction with 316 complete at the end of March 2021. Phase 1 & 2 are due to complete September 2021 and phase 3 has started. Reserved matters applications for part of phase 4 was approved in August 2021 and phase 7 was approved in May 2022.
- 3.48 Both these sites are on brownfield land and this will have been a factor in their delivery. However, both are key regeneration sites with high quality development. In the longer term, Medway Council plans to allocate additional sites of this or similar size as part of its forthcoming local plan, and such sites are expected to be a key means of addressing housing need in Medway in a sustainable manner. As their sample of sites is so small in Medway, the build out rate of such sites will be of limited

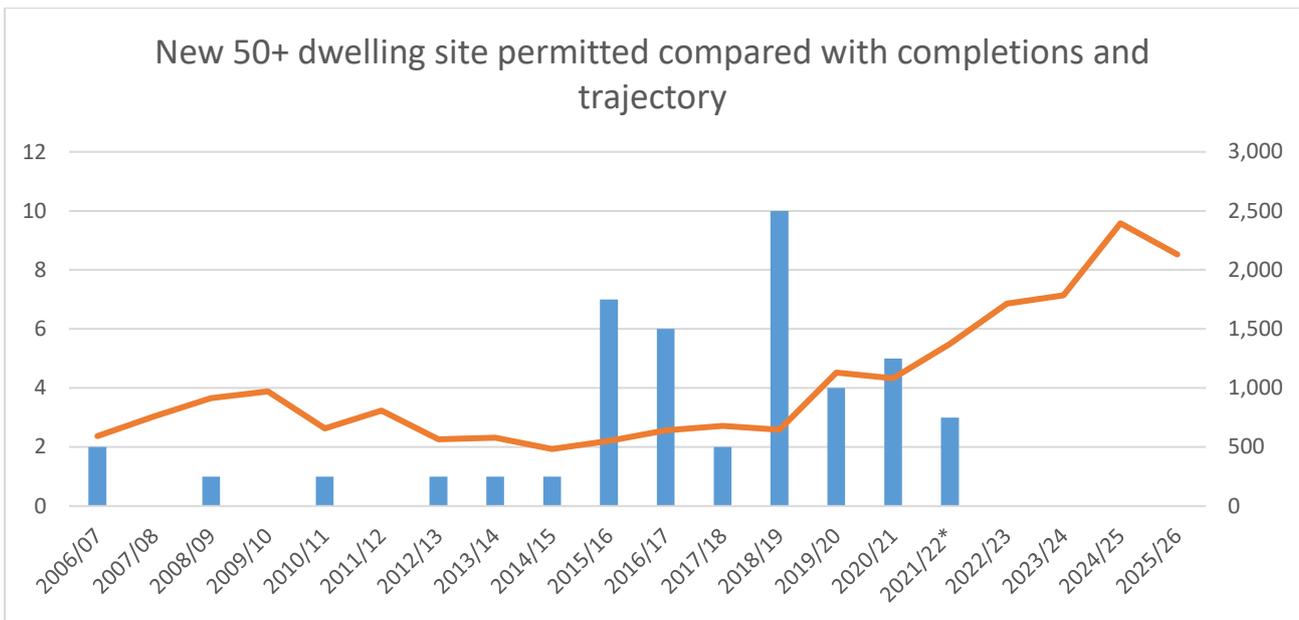
use and evidence from research such as NLPs 'Start to Finish' will be referred to when detailing a trajectory of development for the new Local Plan.

Delivery of medium-sized 50+ unit sites

- 3.49 Medium sites play an important role in the delivery of new homes and this has been the case in Medway. The majority of development in Medway over the last five years has been delivered on sites over 50 dwellings, which could encompass both volume housebuilders and larger SMEs. Excluding delivery at St Mary's Island, delivery on such sites has accounted for approximately half of delivery in Medway in recent years.
- 3.50 Many of these sites have been on brownfield land and play an important role in helping Medway meet its regeneration aspirations. Small and medium sites generally come forward more quickly with shorter lead-in times. However, larger sites deliver more dwellings per year than smaller sites.
- 3.51 Earlier discussion focuses on the increase in development coming from larger and greenfield sites that the Council has permitted outside the Local Plan boundaries to increase the pipeline of sites and this is starting to give positive results. However, the Council recognises that there is a need for a good mix of sites to meet the identified LHN. Traditionally, Medway has had a lot of small and medium size sites with many being brownfield sites. Over half of all sites are small sites of 0-4 units. As is probably expected, the quantity of sites then falls as the capacity of the sites get larger. The larger sites will deliver a greater quantum of units overall but this will happen over a longer period of time and some large sites will not deliver at the same time as each other. The small to medium sites will be able to deliver alongside the larger sites and this will help increase delivery rates. There will be a variety of sites available for allocation to support this approach. Work on the local plan will look at the mix of sites, alongside work on viability, to help inform the trajectory.
- 3.52 The following chart shows newly permitted sites of 50 or more dwellings per year as identified by annual monitoring. It demonstrates that a significant number of these larger sites were identified in the run up to the last Local Plan. There is then a long period of time where only small numbers of new large sites were identified in each year. This is followed by the last few years where on average the number of new larger sites permitted has increased significantly.



3.53 In the last seven years there have been 37 new sites with 50 or more units permitted which compares with preceding seven years when only five new larger sites were permitted. This has happened because the Council has taken positive steps to address the shortfall in the number of new homes being permitted including making difficult decisions about the types of sites that are suitable for development. Many of these sites are starting to deliver and this was reflected in the monitoring data for 2019-20 and 2021-22 with Medway's highest rates of delivery at 1,130 units and 1,082 units respectively. The early indications for the current round of monitoring is that there will be similar levels of delivery for 2021-22. The trajectory was adjusted in 2021 to reflect a reduced rate of delivery that was expected due to Covid-19 and will be reviewed as part of work on the Local Plan.



Role of SME developers

- 3.54 The number of SMEs within the Medway market has reduced in recent years and they are being forced out of business for many reasons. They have cited the increase in local housing need requirements in the south east as a possible factor. The need to deliver large amounts of housing has led to local plan policies focussing on strategic sites and new settlements which do not suit their business model. They have a different operating model to the volume housebuilders who have greater control of the market. As an example, during the Covid-19 pandemic it has been reported that Tier 1 developers received supplies ahead of other developers which is one of the areas that severely affected the ability of sites to continue operating efficiently. SMEs build out their sites quickly upon approval because this supports their business model. The Council recognises that SMEs play an important role in the supply of new homes and will help facilitate the delivery of a diverse mix of sites. Local SMEs are promoting a small sites policy for consideration in Local Plans and Medway officers are in discussions about this.
- 3.55 Local SMEs have stated they think if government and planning authorities were to require parts of big sites were allocated to them or require partnership working between volume housebuilders and SMEs on large sites, that the quality and rate of delivery would go up. Both the Letwin review and NLPs 'Start to Finish' research recognise that having multiple outlets on sites will on average have a positive impact on build out rates. This has proved challenging to facilitate locally due to technical and legal issues. The new Local Plan is considering a policy to support housing mix and require this on sites over a defined threshold of units or the need to produce development frameworks for these sites to specify how development should come forward.

Diversity of housing types and market segmentation

- 3.56 Development in recent years in Medway has provided for choice for different markets, including suburban estate housing and waterfront apartments. The current pipeline (see Map 2) shows most permissions for flatted developments are in the urban core with housing developments tending to be on the periphery and on the peninsula. This reflects the types of sites coming forward and the Council's action on permitting developments outside the current Local Plan boundaries to ensure more housing is delivery.
- 3.57 Last year Medway predominately delivered two bed properties on fully built out sites but there was a fair distribution across other sizes of dwelling. The Council recognises that there is a need to provide housing to meet the needs of local residents. Policies relating to housing delivery and the diversity of types will form part of the new Local Plan. This will be informed by the updated local housing needs assessment undertaken in 2021. The local plan will look at providing land for custom and self build housing as well. In considering strategic allocations in the plan, the Council will look at delivery rates and the potential number of sales outlets that could be achieved to

provide for market segmentation to boost delivery rates and meet a mix of housing needs. The large sites that could be allocated on Hoo as part of the spatial strategy for the new local plan will also provide a wide mix of housing.

Table 4: Completions (gross) on large sites by property type and number of bedrooms 2019/20 Please note, this table only shows sites which have been completely built out; it does not include sites where completions have occurred with the remainder still under construction

Number of bedrooms	Houses	Flats
One	0	39
Two	26	32
Three	38	1
Four or more	19	1
Total	83	73
Total % split	53%	47%

Table 5 Affordable Completions (gross by property type and number of bedrooms 2019/20

Number of bedrooms	Houses/Bungalows	Flats
One	0	55
Two	33	82
Three	27	17
Four or more	2	0
Total	62	154
Total % split	29%	71%

- 3.58 There are increasingly different types of housing being offered in Medway. The houses at the Kitchener Barracks site are a modular build product being delivered alongside the refurbishment of the barracks. The site is being developed by Top Hat and Latis Homes. This is a flagship scheme for them that will showcase the quality of their product. They have engaged with the Council to promote and develop their scheme and how their products may be used on other sites. Top Hat partnered with Medway Development Company to deliver 20 modular units on the White Road Community Centre site.
- 3.59 The Chatham Waters development will see 193 flats built for the private rented sector (PRS), alongside flats delivered for market housing and further phases of housing. The PRS scheme completed in August 2021. The conclusions of the Letwin review suggest that these are different markets so these should sell at the same time as each other. In terms of delivery, both being blocks of flats means they will be delivered in one tranche, and if they sell together then it may encourage later phases to come forward more quickly. The Council will monitor the delivery to assess the level of interest in this housing product.

- 3.60 There has also been an increase in the diversity of sites being delivered in Medway. In 2015/16, 7% of consented development in the housing pipeline was on greenfield sites. For 2020/21, it was at 68% of future development of homes in Medway planned on greenfield sites. This demonstrates that the Council has granted planning permission for a number of greenfield sites, outside of current Local Plan development boundaries, to increase housing land supply. These will have been difficult decisions taken by the Planning Committee but the increase in delivery numbers is beginning to be seen, as evidenced by Medway's recent increase in delivery performance.
- 3.61 The Council has a self-build and custom housebuilding register where members of the public can register an interest in building their own home in Medway. There are three schemes that could deliver 14 units specifically for self-build units with one site now having four complete and one under construction when recently surveyed. Encouraging the delivery of more self-build plots in suitable and sustainable locations will be included within policies of the new Local Plan. Neighbourhood plans in Medway are also considering opportunities for self-build and local needs housing.

Role of Affordable housing

- 3.62 Last year, 2020/21, saw gross completions of affordable housing at 216 units which is 19% of the number of gross housing completions, a decrease on last year's 27%. The level achieved varies on an annual basis. It is recognised that affordable housing can accelerate the delivery of housing and that it is a distinctly separate market to standard market housing. It can also be used to support development during a recession by providing a useful injection of cash when the units are transferred.
- 3.63 The Letwin '[Independent Review of Build Out Rates](#)' highlights sites with a higher proportion of affordable housing will deliver more quickly. NLPs '[Start to Finish](#)' report draws a similar conclusion. Medway will be considering the level to set affordable housing requirements as part of the viability assessment work for the Local Plan. This will need to be balanced to provide the level of affordable housing that Medway needs but ensuring that sites are still viable and therefore deliverable.
- 3.64 In past discussions, housing associations have raised concerns about the difficulty in delivering the affordable housing that had been negotiated as part of a S106 where the registered provider had not been included within that discussion. This could be that the terms are difficult for them to meet but also that the housing mix might not be right, especially if there is a time delay in implementing the consent. This then leads to a need to renegotiate the terms of the S106 which will introduce delays.
- 3.65 Some providers have also raised the issue of the number of units that are available for affordable housing on some smaller sites. For the smallest sites that meet the threshold this could be just six units for affordable housing and multiples of these sites

become harder to manage both at build out and occupation. Therefore, a number of providers would prefer larger sites where more affordable housing will be delivered or to use commuted sums from section 106s to build out their own sites.

- 3.66 Developers in Medway, particularly SMEs, are now reporting that affordable housing providers will not take units from smaller sites when the total number of affordable units is less than 50. This has the potential to cause delays on all sites delivering less than 200 homes and even stall delivery. Medway has a lot of sites below this threshold so this could have an impact on delivery rates. This is an issue that needs to be addressed by DLUHC.
- 3.67 The government introduced the First Homes policy last year with an early delivery programme. Medway Development Company successfully bid for funding from this programme and will be delivering first homes at their Garrison Point and Chatham Waterfront schemes. The homes will be discounted by at least 30% of market value, capped at a cost of £250,000 outside London. Developers, particularly SMEs, say it is unclear what impact this will have on the market at this stage. The new local plan will include first homes in its policies. This is an area that will need to be monitored.

Leadership, Entrepreneurism and Attraction

3.68 It is seen that market interest is higher in attractive areas where people want to live. Therefore, it is important that the Council works constructively with partners, businesses, and communities to promote Medway as providing a good quality of life to residents and investors. The Council has taken a leading role in place making and has led on many urban regeneration schemes and continues to work with Homes England to bring forward development.

Medway 2037 and Regeneration

3.69 Medway 2037 Regeneration Strategy Refresh sets out the regeneration aims and objectives for Medway across eight priority areas – Destination and placemaking; Inward Investment; Innovation; Business accommodation and digital connectivity; Sector growth; Improving employability. It is being refreshed to align with the Council's Covid-19 recovery plans, Climate Change Action Plan and wider changes and opportunities.

3.70 The Regeneration service will lead on delivery of the Medway 2035 vision and RDP. They have secured investment in infrastructure to enable and promote development to deliver the Council's regeneration ambitions. Through the South East Local Enterprise Partnership's (SELEP) Local Growth Fund, national government is investing £40million in Medway's regeneration. This includes Strood Town Centre and Waterfront, Chatham Placemaking and Waterfront, Innovation Park Medway, Rochester Riverside, Medway City Estate, and Greenspace projects including Command of the Heights. They have also secured government funding through the Housing Infrastructure Fund and Future High Streets Fund. The Council is also active in securing funding and delivering projects through the Levelling Up Fund and the UK Shared Prosperity Fund.

3.71 SELEP have allocated Medway up to £1.99million of Getting Building Funding (GBF) to create a learning skills and employment hub. The skills hub will be run by Medway Adult Education to help adults to retrain, upskill and get employment opportunities. It will be situated on the first floor of the former shopping centre, Britton Farm in Gillingham. The final funding will be announced later in the year. In addition to this, the ground floor has been converted into offices in partnership with Kent and Medway NHS and Social Care Partnership Team and Medway Development Company will build 44 affordable homes in the old loading bay of the site.

Future Hoo Housing Infrastructure Fund programme

3.72 The Council identified lack of infrastructure capacity as a significant constraint to growth and has worked on securing resources to upgrade key services and infrastructure to support sustainable growth. It was announced in November 2019 the

Council had been successful in its bid to the Ministry for Housing, Communities and Local Government (MHCLG) for £170 million from the Housing Infrastructure Fund. The Council is using the funding to invest in major improvements to transport infrastructure and developing a strategic environmental management package to ensure the protection of areas of international and national importance for wildlife. This will enable further development in this area that could help to meet Medway's growth needs over the next 20 years. This potential growth could also be an important part of our development strategy for the new Local Plan.

3.73 The Planning and Regeneration teams have been working together on a development framework to guide how growth could come forward. This proposes a rural town based around Hoo St Werburgh and potential expansion of other villages. A brochure introducing the proposals, which set out the scale, ambitions, and principles for growth was published in the spring of 2020. Consultation on the Future Hoo HIF proposals started in January 2021. Further work is being carried out on a draft Hoo development framework which will be published for consultation later in 2022.

3.74 . The Council's Future Hoo delivery team is making good progress in hitting key milestones in the programme design and delivery. There is also ongoing preparation work to secure planning permissions for road, rail and environmental investments with a planning application being approved for a country park to support environmental improvements and increased growth on the peninsula.

High Street bids

3.75 Vibrant and successful town centres are an important part of a wider 'offer' to attract development and people to Medway. The Council has been awarded up to £1.6million of government funding to revitalise a section of Chatham and Rochester High Streets located within the Star Hill to Sun Pier Conservation Area. The project is being delivered through Historic England's High Street Heritage Action Zone programme and will breathe new life into the high street by revitalising and repairing historic buildings to bring them back into use, and uncovering the hidden heritage of the area through a community led cultural programme.

3.76 Medway also successfully secured £9.5 million of the Future High Streets Fund to further transform Chatham High Street. The funding is being invested into Chatham to further economic growth, increase housing, create more jobs and provide a vibrant town centre experience. Improvements are likely to be delivered at the Brook Theatre, the former Debenhams building, St John the Divine Church, Pentagon first floor, Military Road/the Paddock and within redundant High Street space.

Place branding

3.77 The Medway Place Board was established in February 2017 and comprises key stakeholders involved with strategic discussions about Medway the place, with the aim of supporting the priority to 'Putting Medway on the Map'. A place branding project promotes Medway as a 'waterfront learning city'. There was a place branding launch in June 2018 with stakeholders and individuals from Medway's community. Medway has been promoted at events such as MIPIM and over recent years has had an increased profile with articles in the national media property and tourism sections. A Medway Champions Programme has been established with the aim of changing perceptions of Medway and to raise its profile. The We Are Medway website has been launched and provides a toolkit for champions. There are bi-monthly Medway Champions meetings, and growth in social media engagement. These activities contribute to building confidence and securing investment in Medway. The work continues through a commissioned Chatham Placemaking project.

Cultural events and festivals

3.78 Medway has a large and varied cultural events and festivals programme which celebrates Medway's past and present. It hosts more than 30 days of free festivals and events each year including two Dickens festivals, Chinese New Year, the English Festival, Sweeps Festival, Rochester Castle concerts, Under Siege, Will Adams Festival and Bonfire Night. There are numerous other events throughout the year as well as access to cultural and heritage assets. This helps form part of Medway's identity and attraction as a place to live. The Rainbow Effect is a new project that has seen Medway commission 10 local creatives to create a range of contemporary artwork. Estuary 2021 is the second edition of the large-scale arts festival that celebrates the lives, landscapes, and histories of the Thames Estuary. Medway Cultural Partnership in partnership with Medway Council are overseeing the development of a new Cultural Strategy for Medway over the next ten years (2022-2030).

City of Culture 2025 bid and City Status Bid 2022

3.79 In May 2021, the government launched the competition for 2025 UK City of Culture and later in the year a competition to award city status as part of the Queen's Platinum Jubilee celebrations. Medway submitted entries for both and although unsuccessful, the bids have shown that Medway is ambitious, transformed in recent years with a strong heritage and evolving cultural offer. The work involved in the bids has contributed to other priorities and has highlighted Medway as a place to live, learn and visit. The bid work has linked to a range of local initiatives as part of a corporate strategy.

Communication with landowners, developers, agents and registered providers

- 3.80 The Council offers a range of meetings and forums to engage with different stakeholders to improve understanding between the sectors in the development industry. This includes a major developer forum annually aimed at developers and planning consultants of larger schemes. There is also an annual agents meeting which is aimed more at agents supporting smaller scale and householder developments. Both these forums provide updates on legislation, policy and processes but also offer the opportunity for stakeholders to feedback about the service we provide and how this could be improved to support them.
- 3.81 One of the key messages that Medway officers are keen to promote is their positive and open for business attitude. The starting point is that development should be permitted unless there is material harm. Developers recognise that Medway officers will work with them to bring forward high quality development and are willing to think outside the box. The Council actively engage with the development industry in a number of ways.
- 3.82 The Head of Planning holds breakfast meetings with a range of housebuilders such as Countryside, Bellway, Crest Nicholson, Redrow, Persimmon, Wealden Homes, Esquire Developments and a couple of larger affordable housing providers. The meetings are not formally minuted and offer an opportunity for developers to raise issues with our processes and policy but also to raise issues with central government policy. This has proved a useful way of receiving information and feedback that can help inform service delivery and ways in which the Council can support the delivery of housing. It is also used as a 'sounding board' on key matters in planning and development. The Council also organised a joint meeting with developers, local planning authorities and the chief planner at MHCLG to discuss deliverability.
- 3.83 In November 2019, the Head of Planning helped facilitate the creation of a SME developers forum and will continue to attend and support the network. It provides an opportunity for SME developers to collaborate on training, expertise and joint ventures. It is currently a group of 20 small to medium housebuilders that build between one and 100 homes a year. The forum was formed to bring together a group of similar sized companies to discuss challenges in the planning system and explore how to better deliver high quality schemes as a collective. At the time of forming, there was only one other similar SME forum in the country, in London. The Council identified the need to support this group of developers because the proportion of new homes created by small housebuilders has dropped from almost 50 per cent to 10 percent but there is be a need to promote small to medium sites across Medway to achieve the level of delivery required.

- 3.84 The Planning Service has established an implementation officer role with the purpose of strengthening the understanding of the development sector in Medway, and specifically following up on schemes where development is delayed in coming forward. A process has been created to contact developers to encourage implementation of their consents.
- 3.85 Planning officers also consult with developers annually to check the projections on phasing for development. This information is then used to produce the development trajectory in the AMR. Officers from Planning, Regeneration and Housing services meet to critically assess the realistic prospects of proposed trajectories on large sites, based on past performance rates. There has been some input by developers this year and this will be used alongside current knowledge on phasing to forecast housing supply. This increases confidence in housing trajectories.

Medway Development Company

- 3.86 Medway Development Company (MDC) was set up as a delivery body by Medway Council in 2018. It was created to deliver high quality developments but also maximise returns on Council owned assets with the intention of reinvesting them to support strategic priorities. It is progressing schemes on brownfield sites and contributing to market confidence in Medway's future growth. The company's business case identified development plans for 12 Council-owned sites over 5 years.
- 3.87 Since its creation in 2018, MDC has continued to progress its early phase sites, which include Chatham Waterfront, Whiffens Avenue Car Park, Chatham (known as Garrison Point), White Road Community Centre, Chatham and Britton Farm, Gillingham. Across these sites 361 new homes will be delivered. The 20-dwelling scheme at White Road reached practical completion in January 2021. The Garrison Point scheme is expected to reach practical completion in the autumn of 2022. At Chatham Waterfront, the first blocks are expected to reach this stage in March 2023. Both schemes are part of the First Homes early delivery programme.
- 3.88 The company's next projects include the redevelopment of Mountbatten House, Upper Mount Car Park and Queen Street Car Park. Mountbatten House got planning permission for 164 units at the end of April 2021. Upper Mount Car Park will deliver some of the Mountbatten House affordable housing, off site, and there is currently a planning application pending a decision. Queen Street Car Park will provide 45 offsite affordable dwellings for the adjoining site and a planning application is pending a decision.
- 3.89 MDC officers continue to hold regular meetings with the Planning service to ensure efficient progress of their schemes, from early pre application discussions, use of

PPAs, and progression of conditions as well as those which are now on site in their delivery phases.

Direct delivery and Housing Revenue Account

3.90 In addition to MDC, Medway Council is also directly delivering housing using its Housing Revenue Account. At the end of 2020, the Council has delivered a project for six bungalows in Twydall, Gillingham for older residents this year and those with mobility problems. This provides for a small number of homes meeting specialist needs Previous schemes have included Centenary Gardens, Gillingham for 32 bungalows let to council tenants. There were an additional 24 units completed January 2016 with pepper pot delivery across Medway. This again shows confidence to the market and allows the Council to deliver the homes that meet residents' needs. The skills are there to deliver this kind of development and the Council has shown willingness to do this.

3.91 Last year, the team secured planning permission for three more sites in Twydall for a total of 28 units as part of the HRA Phase 4 Programme. Works began in 2021 and expected completion will be late 2022 to early 2023.

3.92 The team is working on the delivery of another couple of sites in Gillingham with a local developers. This project and Phase 4 forms years 1 and 2 of a 10-year development programme and will hopefully provide 74 units in total.

Compulsory Purchase Orders

3.93 These can be used to progress development. Medway have historically used these for sites to develop housing and other schemes such as Rochester Riverside and Gillingham Pier. This has enabled remediation works to be completed to de-risk the sites. The Council used CPO powers to purchase Mountbatten House, a redundant office block in Chatham, for conversion by Medway Development Company to residential use. There was already a prior approval on this site for 112 units so the hope is the Council can align this to their priorities and provide housing to meet the needs of Medway residents as well as supporting regeneration in Chatham.

Commuted sums

3.94 Medway Council has a Housing Revenue Account that has been used to deliver some schemes, as noted above. Most affordable housing has been provided on site by the developer, in line with current Local Plan policy, but some sites are coming forward for off-site affordable provision. There are ongoing discussions on how to use commuted sums for the delivery of affordable housing. The Council is working closely with registered providers as they are also able to use their recycled capital grant and this may enable quicker delivery of schemes.

Skills and employability

- 3.95 As noted in the [Letwin Review](#), there have been reported skills shortages in the construction sector that have impacted on housebuilding. Medway has adopted a Skills and Employability Plan. Construction has been identified as a skills shortage area and therefore a priority sector within this plan. This plan aligns with priorities in the Council Plan and its Regeneration Strategy. There are 18 key actions that will help deliver the aspirations of the plan. Some developers have identified a shortage of construction workers as a barrier to development. The Regeneration team have a skills and employability programme manager who facilitates the implementation of the plan with the aim of increasing the number of people within Medway with the relevant skills. There is direct support available to developers in promoting apprenticeships and the Council also has good links with local training providers.
- 3.96 There is the potential for up to £1.99 million from the SELEP Getting Building Funding to deliver a learning skill and employment hub at the former Britton Farm Shopping centre which will help adults to retrain, upskill and get employment opportunities.

4 Key Actions & Responses

- 4.1 A review of key issues has shown that Medway Council is already working on a wide range of criteria to encourage the delivery of housing. This section sets out the key actions in response to the issues discussed in the analysis above and the monitoring of actions from previous action plans.

Key Actions	Root cause/evidence	Timescale	Progress and outcomes	Responsibility
Policy and Process				
<p>Preparation of new Local Plan</p>	<p>Provide proposed development allocations to meet housing needs</p> <p>Demonstrate mix of sites and delivery rates to secure five-year land supply and range of housing</p> <p>Provide details in draft plan on housing mix, delivery rates and implementation proposals, with specific consideration of strategic sites, to demonstrate how potential constraints to growth addressed.</p> <p>Policy and allocations for specialist housing needs in draft plan.</p> <p>Infrastructure Delivery Plan and Viability Assessment provide basis for sound development allocations.</p> <p>Monitoring framework to consider measures arising from HDT action plan.</p> <p>Review of Developer Contribution Guide to align to draft Local Plan.</p> <p>Publication of further policy and guidance documents as supporting evidence for the Local Plan and to promote development opportunities.</p>		<p>Work on the evidence has progressed The Council is reviewing the timing for the next stage of the local plan preparation.</p> <p>Publication will give further clarity on proposed allocations and phasing of development.</p>	<p>Planning Policy team</p>

Review of development management processes	<p>Review processes for condition discharge review options for flexible condition for materials</p> <p>Encouraging increased use of PPAs and consideration of specific application type PPAs such as discharge of conditions</p> <p>Review process associated with S106 negotiation and introduction of some more flexible clauses in particular associated with affordable housing</p> <p>Review of Development Management decision making processes</p>	Ongoing work and feed into annual service plans	<p>Conditions data indicates generally timely decisions are being made. Ongoing consideration of flexible condition for materials.</p> <p>Officers have continued to promote PPAs which supports timely decision making.</p> <p>Updated ISO procedure to be adopted and audited independently.</p>	Development Management and Legal teams
Continue to monitor site using evidence log (PAS data standard) to RAG rate sites and focus on unblocking red sites.	<p>Review of sites has highlighted sites that have stalled and allow for targeted actions on relevant sites.</p> <p>General issues raised can be acted upon if that would be beneficial to multiple sites and encourages quicker delivery.</p>	On going	<p>Sites have been identified and actions to progress taken.</p> <p>New sites get added and reviewed when annual monitoring survey is carried out.</p>	Implementation Officer, Planning Policy Team
Monitoring of progress on action plan to be included within service plan monitoring and reporting.	Service planning monitored quarterly to ensure progress on actions.	Quarterly	Monitoring of actions is happening in line with service monitoring processes.	Planning Service
Site Delivery				
Working with registered providers to identify sites		On going		Planning Policy & Housing teams

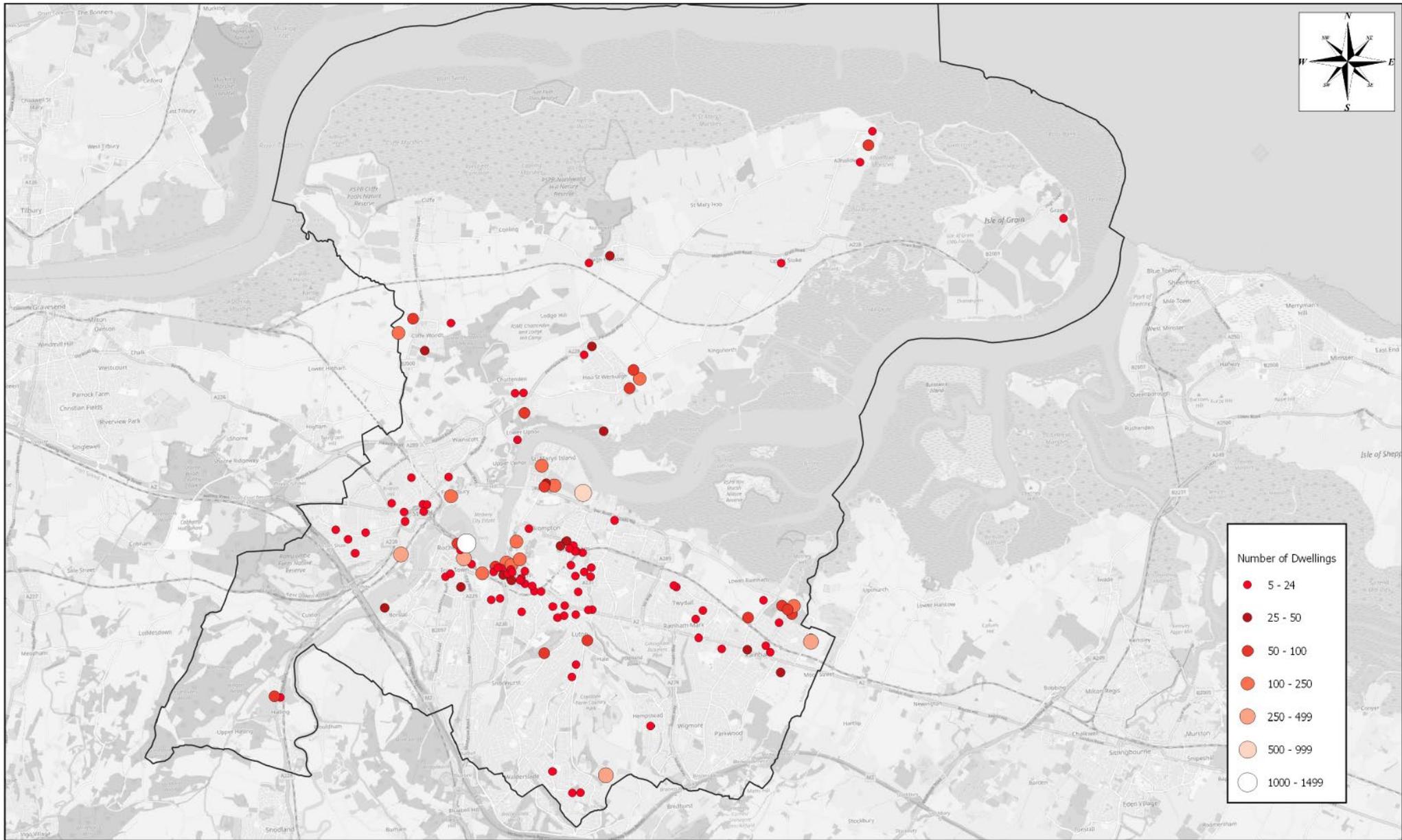
below 25 units for them to deliver as 100% affordable housing				
Developing a plan to use commuted sums for delivery of affordable housing units	Housing team to identify sites suitable for affordable housing with some delivered by commuted sums. Support from Planning service to identify suitable sites.	On going	Sites delivered in past years with some due to be delivered in the next 1-2 years.	Housing
Formation of task group with representatives of the Council, developers and registered providers to work on protocol for delivery of affordable housing				Planning and Housing
Empty Homes Strategy	Proportionally high level of empty properties in Medway indicates need to address the issue.	On going	Dedicated derelict buildings an empty properties officer identifying relevant sites. Trialling Kent County Council's 'No Use Empty Scheme' to provide loans to support bringing empty properties back into use.	Empty Homes Officer, DM Team

<p>Future Hoo HIF delivery of infrastructure and environmental projects</p>	<p>Infrastructure to support delivery of Local Plan ambitions to provide additional housing on the Hoo Peninsula</p>	<p>Ongoing to deliver to agreed programme</p>	<p>Consultation undertaken on Hoo Development Framework and HIF proposals.</p> <p>Planning application submitted for country park, part of the environmental enhancements part of the HIF programme.</p> <p>Extensive technical work on road, rail and environmental projects.</p>	<p>Dedicated HIF Delivery Team</p>
<p>HRA delivery</p>	<p>Additional local authority housing will support overall delivery of housing</p>	<p>Ongoing</p>	<p>A few sites have planning permission with expected delivery timescales of 1-2 years.</p> <p>Purchase of units from local developer who is interested in collaboratively working with the council.</p> <p>Work ongoing to secure additional sites.</p>	<p>Housing and Regeneration teams</p>
<p>First Homes</p>	<p>Allocation of sites. Monitoring of delivery. Dialogue with developers.</p>	<p>On going</p>	<p>New policies</p> <p>Dialogue with developers.</p>	<p>Planning Service</p>
<p>Leadership, entrepreneurship and attraction</p>				

Continue engagement processes between Planning Service and development sector.	Continuing to support the development sector in Medway to deliver sites efficiently and identify issues in a timely manner.	On going	Continuation of breakfast meetings. SME forum established. Delivery rates and issues obtained through monitoring.	Planning Service
Continuing delivery of place-making programme and implementation of Medway 2035 regeneration strategy, including City of Culture bid, delivery of Innovation Park Medway.		On-going with annual review in service plans.	Implementation of Medway 2035 regeneration strategy	Corporate services

5 Project management and monitoring arrangements

- 5.1 The Council has an ambitious vision for Medway's sustainable growth. There is corporate commitment to securing housing delivery. This action plan is to be presented to Cabinet on 5 July 2022.
- 5.2 The Head of Planning leads on the delivery of actions within this plan, by working corporately and with external partners and developers as appropriate to the tasks.
- 5.3 The action plan feeds into the service's work programme. The Planning Implementation Officer will be responsible for monitoring the progress of the action plan and will report at least quarterly, to the Head of Planning and corporate groups.
- 5.4 The Council will consider the content of this plan in drawing up the monitoring framework for the new Local Plan. This will form the basis of reporting in the annual Authority Monitoring Report



Title: Pipeline of sites with planning permissions for housing

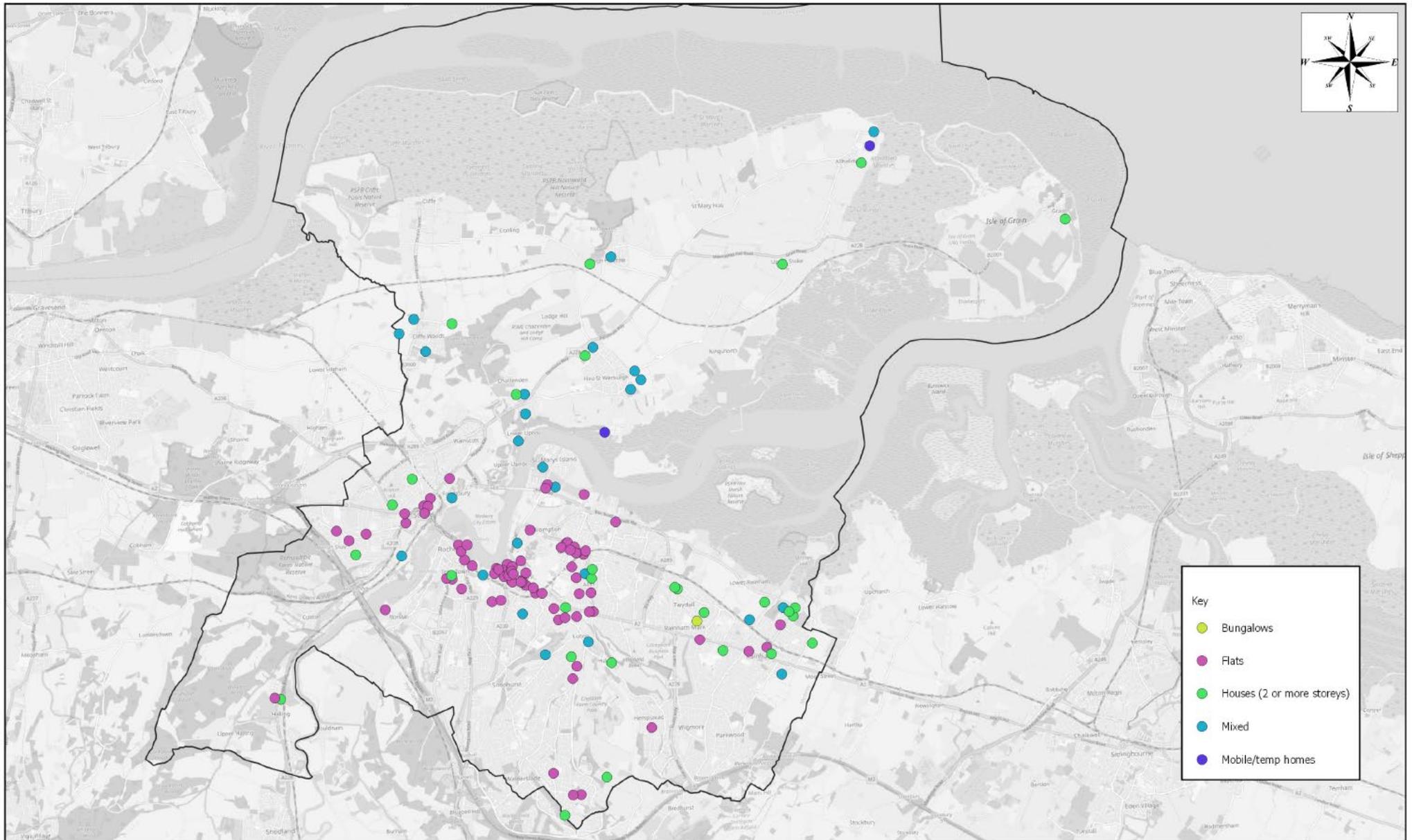
Info: All sites of 5 or more units

Point data has been used to represent the developments as some of these sites are very small and would not be legible as polygons on a map. Please refer to the key as the different coloured points represent different data

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Scale: 1:12000 10.06.2022



Title: Housing Mix in residential development pipeline

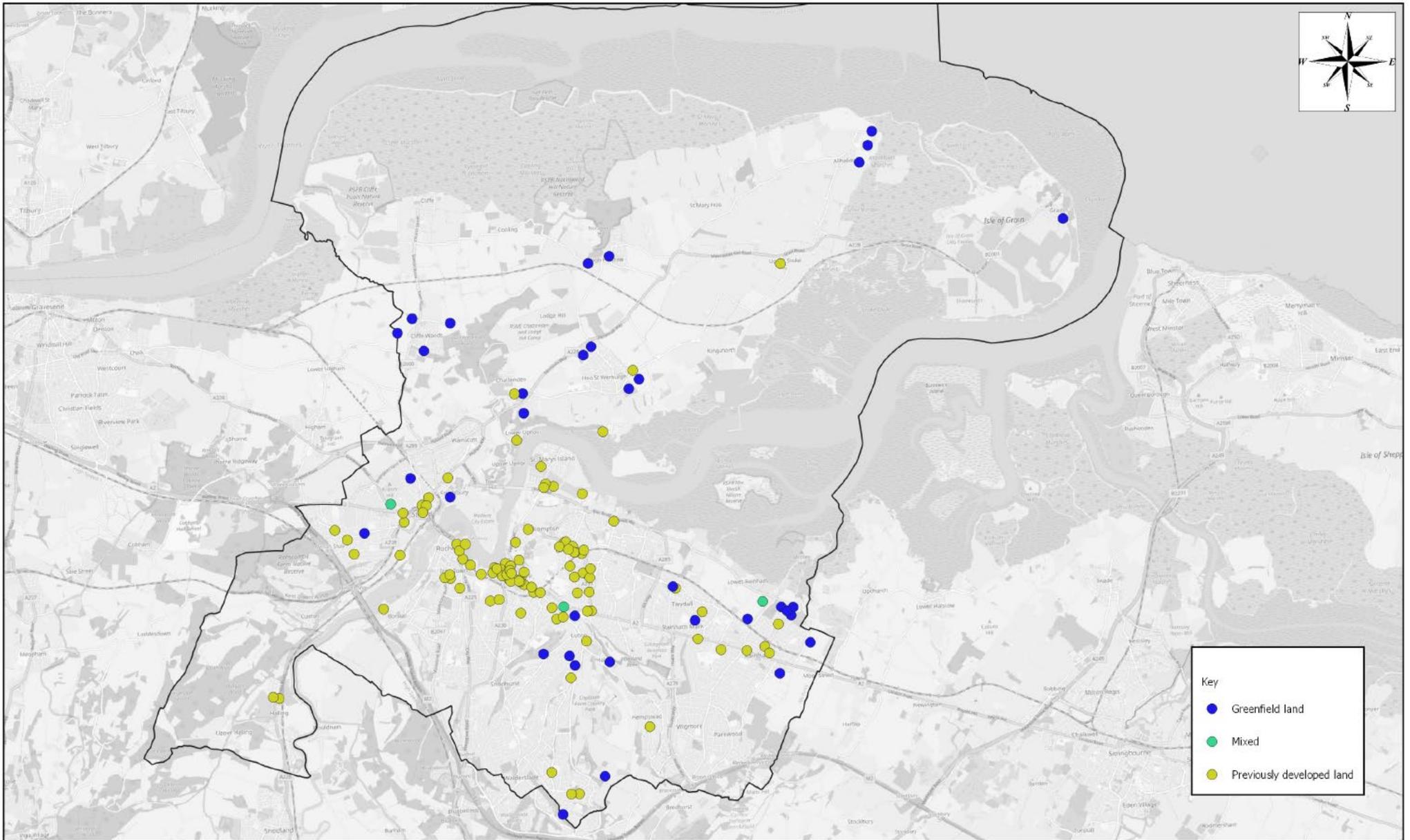
Info: All sites of 5 or more units

Point data has been used to represent the developments as some of these sites are very small and would not be legible as polygons on a map. Please refer to the key as the different coloured points represent different data

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Scale: 1:12000 10.06.2022



Title: Sites with planning permission shown by land type as either greenfield or previously developed land

Info: All sites of 5 or more units

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