



Appendix 1

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Executive Summary

This is Medway Council's fifth Housing Delivery Test Action Plan (HDTAP). The Council has produced the action plan in response to the Housing Delivery Test (HDT) results published in December 2023 because delivery was below the 95% threshold. This is despite the highest rates of housing delivery in Medway's history with four years of higher delivery rates.

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) 2022/23. This shows consistent delivery but not yet at a level to pass the HDT. As work progresses on the new Local Plan, the prediction is likely to change. However, it is clear that the efforts to permit larger greenfield sites has left Medway well placed to continue delivering new homes, this is evidenced by a step change in the number of homes being delivered each year.

The report details progression of actions in the 2022 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 Land Availability Assessments (LAA) 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 Chatham Waterfront and Chatham Design Code 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 after the publication of the Housing Delivery Test measurement 2022, published on 19 December 2023. An updated [National Planning Policy Framework](#) (NPPF) was published at the same time and the Secretary of State for Levelling Up, Housing and Communities issued a [statement to parliament](#) on 'the next stage of our long term plan for housing'. During his speech, the Secretary of State named Medway as a local authority without an upto date local plan and imposed a requirement to submit an updated Local Development Scheme (LDS) to his department, within twelve weeks, setting out a timetable to prepare a new local plan. The Council approved an updated [LDS](#) in February 2024 and submitted this to the Department within the required timetable. At the time of writing this action plan, the Council has not yet received a response from the Secretary of State or his officers. The Housing Delivery Test (HDT) is a measure that looks at past performance on housing delivery and the action plan responds to this, considering past activity in the development sector and housing market, council actions and performance, and anticipated conditions in the near future. The wider social and economic backdrop is significant for this piece of work as it will have an influence on the delivery of housing locally.
- 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, amended slightly by the most recent iteration published in December 2023. 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 fifth action plan that the council has produced.
- 1.3 The government has 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. This was carried into their manifesto ahead of the 2019 general election with the aim of one million homes being built in England during this parliament. The SoS's statement in December 2023 reaffirmed the commitment to meeting the target of 300,000 additional homes per year. The target requires a significant boost in the number of homes to be built and an increase in the speed at which they are 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 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. In December 2022, a consultation on reforms to planning policy was launched, with the new version of the NPPF published a year later. The [Levelling Up and Regeneration Act](#) (LURA) which includes some reforms to the Planning system, albeit with much requiring secondary legislation, received royal assent in October 2023.

- 1.4 A number of measures and reforms that the government has made to the planning system are 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 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 includes 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 usually published annually and have been published five times to date, in February 2019 and 2020, January 2021 and 2022 and most recently in December 2023. 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. The last HDT measurement was published more than a year after its due date, as set out in the previous version of the NPPF and covers the three years between April 2019 and March 2022. 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 of 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 79% in December 2023, up from 67% in January 2022, 55% in the previous year and in the mid 40s in the first two years. This means that an action plan should be prepared and a buffer of 20% should be applied to the local housing need. This will apply until the next HDT measurement which might be published in summer 2024. For the time being, presumption in favour of sustainable development will not be imposed in respect of the HDT result.

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 attended workshops 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 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 plan was agreed by the Council's Cabinet on 11 June 2024 with authority to publish. 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 new corporate [One Medway Council Plan](#) is ‘living in good-quality, affordable homes’ with sub priorities including ‘increase the supply of good quality, energy efficient and sustainable homes’ and to ‘implement a Local Plan’. A key performance indicator will be to increase the number of new homes built per year by 2028 which ties in with the Local Development Scheme timetable. 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. Work is continuing on the Local Plan with a further Regulation 18 consultation being undertaken in June and July.
- 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 borough wide site surveys and seeks specific information from developers on the timing and phasing of housing delivery on sites with permission for 10 or more dwellings. The phasing of housing trajectories is informed by these discussions with developers on their planned delivery rates. This work is also used to assess reasons for under delivery. At the time of writing, the most recent AMR has a housing trajectory for 2022/23 to 2037/38. Survey and monitoring work is currently underway for 2023/24 will be used in the AMR to be published in December 2024.
- 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 Chief Planning Officer and developers of

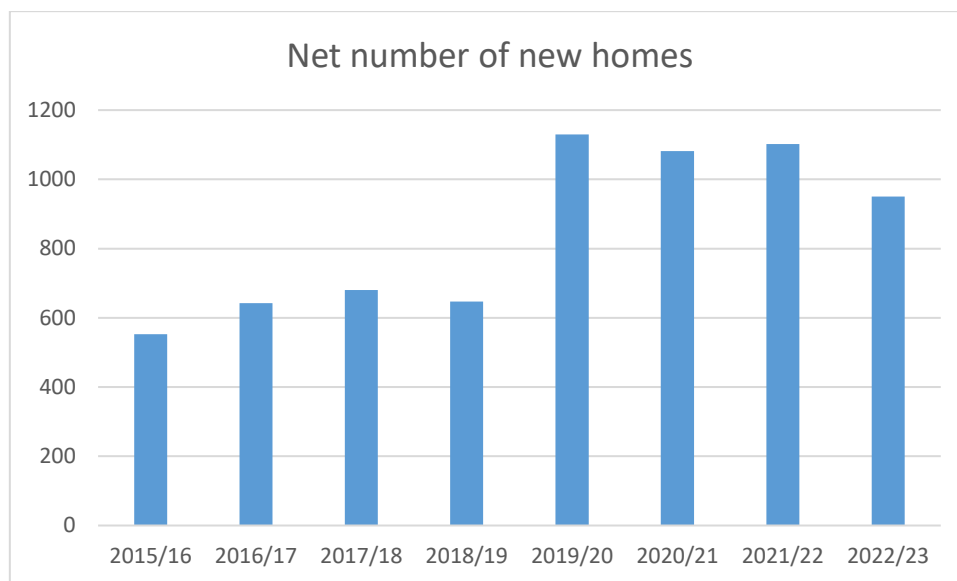
large sites. Ongoing monitoring of the implementation of planning consents has helped identify site specific issues that create barriers to development.

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 in all but name. 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 has been a significant increase in the recent years in the net number of homes delivered from 647 in 2018/19 to 1,130 in 2019/20. This increase has been sustained across a number of years, with 1,082 new homes in 2020/21, 1,103 in 2021/22 and 950 in 2022/23, even with significant challenges faced in the development sector.



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 further analysis on build out rates and factors that might affect the pace of delivery.

- 2.3 There has been ongoing discussion about the problems with the UK housing market and more studies and research is regularly published. One example is the [Competition & Markets Authority's 'Housebuilding market study'](#) published in February 2024. It considers themes that are similar to other studies around the planning system, land market, land banking, housebuilder build out rates but specifically with a focus on the supply of new homes to consumers. Again, these are factors that the Council is aware of and some of the proposed interventions in the market are for government policy with limited scope for the Council. However, some of the policy options highlighted such as increasing the housing mix/tenure on sites, the number of homes delivered through small site and the diversity of housing types are all matters that will potentially be addressed through policies in the new Local Plan.
- 2.4 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

- 2.5 The latest HDT measurement was published in December 2023 (2022 measurement) and showed that rates of housebuilding delivered in Medway in the preceding three years were 79% of the defined housing requirement, calculated using the method in the Housing Delivery Test Rule Book.

	2019-20	2020-21	2021-22	Total	Percentage result
Number of homes required	1,550	1,110	1,586	4,246	79%
Number of homes delivered	1,181	1,067	1,124	3,372	

Table 1 Medway's data taken from the published measurement

- 2.6 There was a significant increase in the number of homes delivered in 2019-20 compared with the preceding years. They are the highest levels of delivery Medway has had since its inception in 1998 and those high levels have been sustained over

the last four years. Survey work for 2023/24 is ongoing so it is not possible to confirm the level of delivery for last year.

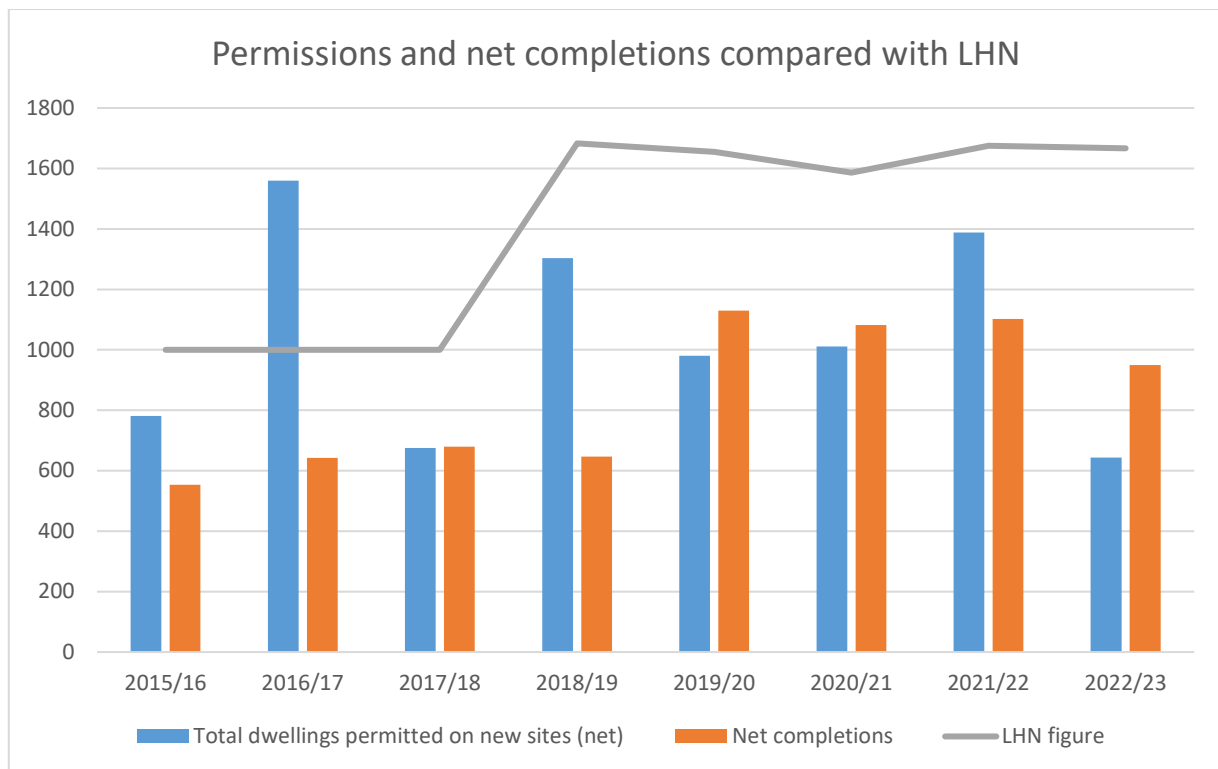
- 2.7 There is likely to be a number of reasons for the increase but it is significant that this coincides with the early phases of delivery of a number of sites outside the current local plan boundaries. Greenfield sites such as Street Farm, Hoo, Walnut Tree Farm, High Halstow, land west of Elm Avenue, 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 Rochester Riverside, Kitchener Barracks, 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.
- 2.8 As Government has promoted its agenda to boost housebuilding, it has introduced reforms to the planning system including the enactment of the Levelling Up and Regeneration Act. This was followed up with an updated NPPF in December 2023. The Secretary of State for Levelling Up, Housing and Communities statement reaffirmed their ambition to build 300,000 new homes per year. This reaffirms the use of the 'standard method' for calculating local housing need as the starting point in plan making for establishing housing requirements. In the past, 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 1,658 dwellings per year needed to meet the five-year housing land supply but increases to 1,990 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 affects the overall number. The affordability ratio marginally improved this year which means the number of homes needed has decreased slightly. The Council commissioned an [assessment of Local Housing Need](#) as part of the evidence base for the new Local Plan.
- 2.9 The following table shows the number of dwellings under construction and those with planning permission but not yet started upto the end of 2022/23. The number of extant permissions has stayed fairly constant in the last five years which means that there has been no significant change in the five-year housing land supply. Although it looks like there is a large number of unimplemented consents, a larger supply of deliverable housing can only be achieved by an increase to the number of extant planning consents.

	2018/19	2019/20	2020/21	2021//22	2022/23
Extant permissions not started (net)	6587	6350	6045	6448	5850
Extant permissions under construction (net)	1486	1629	1925	1757	2061
Total	8073	7979	7970	8205	7911

Table 2: number of dwellings under construction and not started at end of monitoring year 2022/23

2.10 The number of permissions granted on new sites in the last four years is slightly lower than the preceding four years. As reported in the AMR, there was a notable decrease in the number of permissions in 2022/23 with only two sites for over 100 dwellings being permitted during that year. This reflects a decrease in the overall number of applications received in 2022/23 compared with the previous year. Although monitoring for the AMR is ongoing so the total number of permissions on new sites for 2023/24 is not yet confirmed, research undertaken for this action plan shows that there were again few permissions on new sites of more than 100 dwellings. It is possible that the decrease in the number of new permissions seen last year will continue in 2023/24, possibly because there are holding objections from statutory consultees on issues such as highway capacity. This would compound the problem of too few permissions being granted to meet the current high level of local housing need. It takes time for any decreases or increases in the pipeline of permissions to affect the delivery of new homes. The graph below shows the number of newly permitted dwellings each year compared with net completions and the local housing need at the time.

	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023
No of permissions on new sites	81	109	114	104	117	102	88	86
Large/windfall dwellings (net)	694	1447	543	1217	846	912	1317	569
Small dwellings (net)	87	113	132	86	134	99	71	74
Total dwellings permitted on new sites (net)	781	1560	675	1303	980	1,011	1,388	643



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.

External influences

2.12 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 and China’s extended Covid-zero lockdowns also caused disruption to supply chains. Inflation was increasing with the rising cost of oil and gas and the invasion of Ukraine exacerbated this situation. This has resulted in the highest inflation seen in 40 years and nationally there is an ongoing cost-of-living

crisis. The Bank of England has raised interest rates to levels not seen since the financial crash in 2008. This came after the the 'mini-budget' in September 2022 and another change in prime minister, the third since 2019. There will be a general election later this year. This creates a degree of uncertainty around policy direction in the short to medium term. 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 issues and pressures that the sector will have faced.

- 2.13 Developers have reported that conditions for delivering their projects is still 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 or with contractors going bust. Some have needed to redesign schemes, re-finance, and seek new approvals from their backers. Developers in Kent are having problems getting registered providers to take on affordable housing secured as part of a section 106 agreement. As a result, schemes will have been put on hold or delayed and this will affect the overall delivery of homes.
- 2.14 These issues have dampened the housing market and house prices have decreased nationally compared with last year, although at a slower rate than in previous months and apart from London, the southeast of England has seen the biggest decrease. This follows a period of significant increases following 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. There was a decrease in the net number of new dwellings in 2022/23 but not to lower levels seen before 2020. It is not yet clear what the outcome for new dwellings in 2023/24 looks like.

Housing market conditions

- 2.15 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.
- 2.16 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.
- 2.17 Evidence from the development and property sectors gathered through meetings is that the property market in Medway has been challenging over the last two years. However, there are sites that a still developing such as Rochester Riverside, land at Otterham Quay Lane, land at Lower Rainham Road and south of Stoke Road, Hoo. 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. There is nothing to suggest that the market in Medway has been more adversely affected by economic pressures than anywhere else in the country and it still remains a desirable place to developers even if there has been a slight decrease in housebuilding, as seen in wider trends.

- 2.18 The housing affordability ratio in Medway, as of March 2023 was 8.58, meaning that the average property in Medway costs about eight and a half times the average annual salary. This is a slight decrease from last year, meaning homes in Medway are slightly more affordable than they were. Housing in Medway has a similar affordability ratio to the national ratio (8.26), but more affordable than across the south east (10.39). 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.
- 2.19 Although Medway has a good housing market, average sales values are lower than England, Kent and the south east. Prices in Medway are just below the average paid in England, £286,608 compared with £297,735. This compares with £340,955 for Kent and £373,018 in the south-east. The UK House Price Index, based on sales data from HM Land Registry, shows a decrease in average house prices in England of -1.1% in March 2024 compared with the previous year. 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.
- 2.20 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

- 2.21 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.

2.22 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%. 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.

2.23 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) and a figure for windfalls. The delivery figure was adjusted by five months across 2019-20 and 2020-21 to account for disruption during the pandemic.

Measurement year	Year 1	Year 2	Year 3	No. of homes required	Year 1	Year 2	Year 3	Number of homes delivered	Result
2020	1341	1672	1550	4563	669	647	1181	2497	55%
2021	1672	1550	1111	4333	647	1181	1067	2895	67%
2022	1550	1110	1586	4245	1181	1067	1124	3372	79%
2023	1110	1586	1675	4371	1067	1124	961	3152	72%
2024	1586	1675	1667	4928	1124	961	1546	3631	74%
2025	1675	1667	1658	5000	961	1546	1453	3960	79%
2026	1667	1658	1658	4983	1546	1453	1175	4174	84%

2020	2021	2022	2023	2024	2025	2026
55%	67%	79%	72%	74%	79%	84%
Action plan and 20% buffer	Action plan, 20% buffer and presumption in favour of sustainable development	Action plan and 20% buffer	Action plan, 20% buffer and presumption in favour of sustainable development	Action plan, 20% buffer and presumption in favour of sustainable development	Action plan and 20% buffer	Action plan and 20% buffer

Tables 4&5 - The above two tables include the results published in the 2022 HDT measurement 2019-2022. It also includes projections on delivery based on the housing trajectory in the AMR 2022/23 adjusted as per the HDT rulebook. 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.

2.24 The projected results show that Medway will not pass the HDT before the adoption of a new Local Plan. This is a change from last year's position. This is partly because sites identified as deliverable in the [Sustainability Land Availability Assessment \(SLAA\)](#) in December 2019 had been included within the trajectory. An interim [Land Availability Assessment \(LAA\)](#) has been produced following a Call for Sites in February 2023 as part of the preparation for the new Local Plan. The LAA does not show preferred sites for development at this stage so none of these sites have been included in the housing trajectory for 2022/23. However, this position will change as work progresses on the new Local Plan. The 2022 measurement includes three years of delivering in excess of 1,000 units per year, as per the HDT measurement rule book (this figure is slightly different to the net number of new homes presented in the AMR). Considering Medway was achieving in the mid-600s upto to 2019, this is a considerable achievement and a step change in the rates of delivery in the borough.

2.25 The impacts resulting from wider social and economic events nationally and internationally are issues that affect the housing market 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. There is some continuing support for first time buyers with Lifetime ISAs but there are limitations to these and may only support a limited number of first time buyers. There have been some support for mortgage products with lower deposit requirements. However, these are against a backdrop of significantly increased interest rates on mortgages. The government has launched 'First Homes' as a new affordable housing product and they are initially became available as part of a government backed early delivery programme which ran until March 2023 with more expected through the planning system. However, there are problems with securing any of this way because they make it even more difficult than it already is for developers to find a registered

provider for affordable homes being required by a section 106. Therefore, the support they provide to the market is limited.

2.26 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. The Council will be engaging with developers and landowners as part of the upcoming Regulation 18 consultation.

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 updated its Local Development Scheme in February 2024. This sets out the timetable for the new Local Plan. The Council is now working to publish a Regulation 18 consultation document in June 2024, in advance of finalising the content of the Pre-Submission Draft Local Plan in January 2025. The Council aims to submit the draft plan for examination in June 2025.
- 3.3 The Regulation 18 consultation in June/July 2024 will provide greater certainty on the direction of the planned growth in Medway up to 2041. The consultation will include details of sites and broad locations that could meet Medway's development needs over the plan period. The consultation document will include options on the spatial growth strategy and indicative preferred sites for development allocations. This follows from the Call for Sites, the Regulation 18 Consultation in Autumn 2023, work on the Land Availability Assessment and an interim Sustainability Appraisal and Habitats Regulations Assessment.
- 3.4 As part of the upcoming consultation, the Council will be engaging with developers and landowners to gather information for further analysis of sites and collating wider comments from consultees on sites and broad locations. This work will inform the final selection of sites and site allocation policies.
- 3.5 This is a key stage in advancing the new Local Plan and setting out the preferred growth strategy for Medway, providing greater clarity for communities and developers on meeting development needs.

Land Availability Assessment

- 3.6 This is a key tool in providing for housing land, as well as other types of development, and the Council has considered the widest range of potential sites for development. The first SLAA was published in November 2010, with nine subsequent reviews and reports, followed by the latest interim LAA produced in September 2023. These were supported by 'call for sites' exercises.

- 3.7 This assessment forms part of the evidence base for the new Local Plan and gives the Council a good understanding of the land available for development. The latest LAA process has provided for a comprehensive and robust review of potential development land. The information collected through this work will inform the site selection process for the new Local Plan, together with the Sustainability Appraisal and Habitat Regulations Assessment.

Brownfield Land Register

- 3.8 The regeneration of brownfield sites has been a core part 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.
- 3.9 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 2024, has sites listed with a minimum number of homes to be delivered at 2,464. Of these, a minimum of 1,326 dwellings had permission 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 1,138 without permission. These are in addition to the large sites in Medway's regeneration programme which are not included within the register.
- 3.10 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

- 3.11 There are consents for nearly 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 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.

- 3.12 The majority of sites are at various stages of development or preparing for development and are not necessarily stalled or dormant. The Council should aim to have a [five year housing land supply](#) and this will mean that there will always be a large number of unimplemented consents. As of March 2023, Medway's supply stood at 3.3 years so to increase it to five years the number of homes with permission needs to increase. A buffer of 20% should also be added.
- 3.13 Developers are 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. Increasingly, securing a registered provider to take on affordable housing as part of a section 106 obligation is causing delays or for sites to stall. 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. There has been a recent permission for enabling works. An application is being considered to develop the site for 195 houses which is being brought forward by Medway Development Company, the Council's development arm.

- 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 is planning to increase the number of development briefs and design guidance produced linked to allocations in the new Local Plan. The Council has most recently produced a Chatham Design Code and a Chatham Intra Heritage Action Zone Development Framework to support the delivery of sustainable development. 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.

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 effectively and appropriately 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.

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 increase in the number of PPAs signed in the last two years. The use of PPAs is considered to have had a positive impact on housing delivery. There is

slight fluctuation in the amount of PPAs signed in any given year and is not enough in itself to indicate whether there are wide problems with the progress of housing sites.

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 in each of the last three years has remained static 7.14 weeks. Some conditions applications 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 pre-commencement 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 pre-commencement 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 pre-commencement 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 had previously identified problems securing materials and equipment as being an 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 needed to source alternative materials, there was the potential need to submit further discharge of condition applications which added to the delay. At the time, the Council 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 demonstrates the Council's ability to find solutions to practical issues and is seen to have been 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 an emerging Infrastructure Delivery Plan with the new Local 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 38 weeks in 2022/23 and 48 weeks in 2023/24 compared to 44 weeks in 2021/22. This reflects the individual nature of negotiating S106s as there are significant variances between different applications. The planning decision is issued within a few days of the S106 being signed. The time taken to determine the application post committee was 27 weeks in 2022/23 and 22 weeks in 2023/24 compared with 15 weeks in 2021/22 and 23 weeks in 2020/21. 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. It should also be noted that this is a relatively small sample compared with other types of planning applications. However, it is notable that the number of approvals with a S106 for 10 or more houses has been decreasing from the mid-20s to only 12 in 2023/24 with three of those approved on appeal.
- 3.37 Lengthy delays in negotiating section 106 agreements is often cited as a major barrier to development and one of the justifications for the introduction of Infrastructure Levy (included in the LURA but not followed up with secondary legislation yet.) The Council thinks it may have some limited impact on the speed of delivery of housing. 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 did go through a period of time with a notable staff turnover particularly experienced officers. It proved challenging to recruit staff of the same level of experience compared to those that had been lost. Since the last action plan, the service has been restructured to better manage resources and the Council has addressed an issue with staff pay that made retention of staff a problem. A few new officers have been recruited into vacant roles and several 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. The Council's financial position means a few roles remain frozen. However, this is being managed carefully to ensure that this does not impact the delivery of the new Local Plan or the efficient decision making of planning applications.

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 were not being accredited by the RTPI quickly enough. There is now an accredited course at the University of Kent.

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 in 2021/22 and 50% in 2022/23 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 Vistry including Countryside and Linden Homes (St Mary's Island, Rochester Riverside and Berengrave Nursery), Bellway (south of Ratcliffe Highway and Hillcrest, Hoo and Lower Rainham Road), Redrow (Temple Marsh, Strood, Walnut Tree Farm, High

Halstow and The Maltings, Rainham), and Taylor Wimpey (South of Stoke Road, Hoo) but this has diversified.

3.42 However, over the last few years there has been an increase in interest in Medway with a number of other housebuilders and small and medium enterprise's (SME's) entering the market. This includes McCulloch Homes, Abbey Homes, Peel, Esquire Developments, Jones Homes and Fernham Homes. Some of these sites are now under construction or complete. Medway Development Company, the Council owned development company, is also completing new homes as well as homes delivered by the Council's Housing Revenue Account team.

Empty Homes

3.43 Medway has a higher proportion of empty homes than other Kent authorities. 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 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.

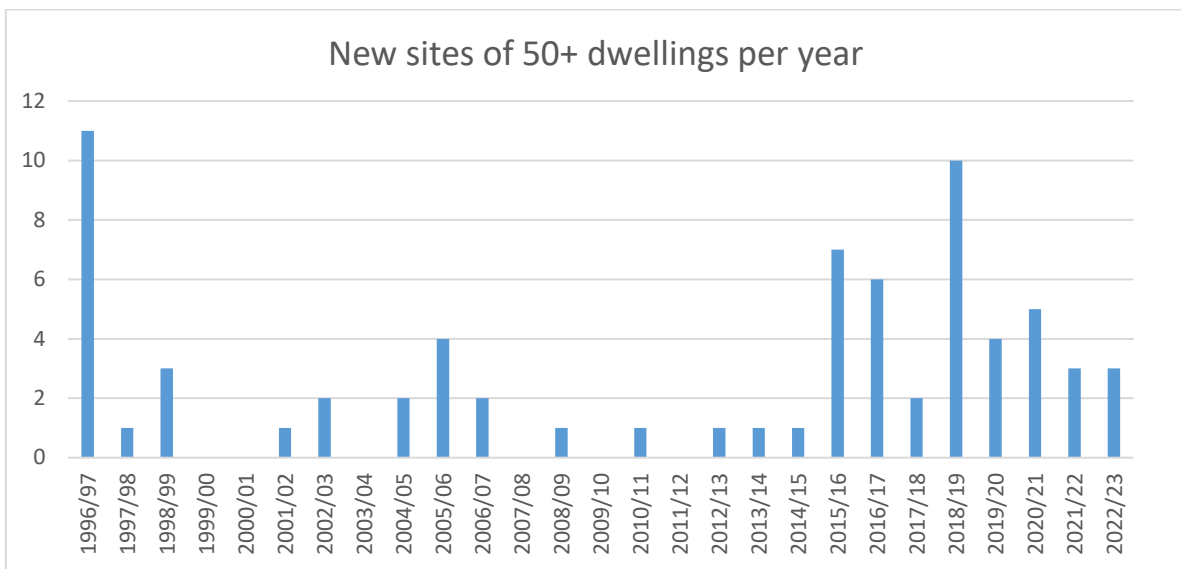
- 3.47 Rochester Riverside was first identified as a key regeneration site in 1988. There were 73 units built in 2012 but the remainder of the site started in 2018, following the recession and review of plans. With 1,473 homes to build it could take 20 years to see all those houses built, using NLP's suggested figures as a guide. However, the developers are predicting a quicker build out than this with completion by 2033. They have completed 502 homes with nearly all occupied and have just commenced on the next phase of 154 homes. 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.. 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 this sample of sites in Medway is so small, 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

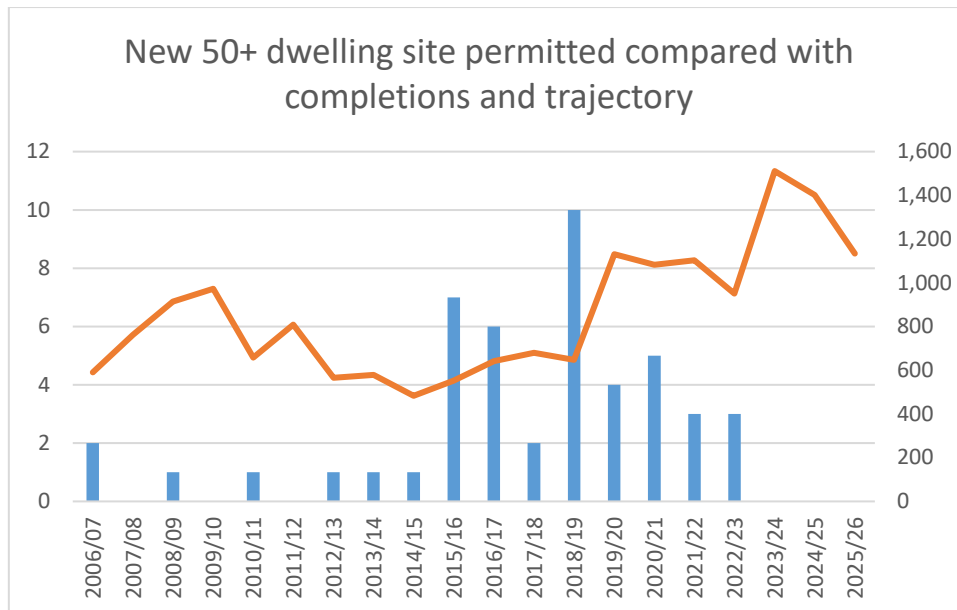
- 3.49 Medium sites play an important role in the delivery of new homes and this has been the case in Medway. The majority of development in Medway over the last five years has been delivered on sites over 50 dwellings, which could encompass both volume housebuilders and larger SMEs.
- 3.50 Many of these 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 eight years there have been 40 new sites with 50 or more units permitted which compares with preceding eight 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 with a few that are complete. This was reflected in the monitoring data for the past four years which includes Medway's highest rates of delivery. However, there is some concern that the number could remain low for 2023/23, as it has in the past two monitoring periods, and this would bring the overall average down.



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 focusing 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 was 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 a draft policy will be presented for consultation on the new Local Plan this summer.

3.55 Local SMEs have stated they think if government and planning authorities were to require parts of large 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 CMA report, February 2024, suggests increasing the mix/tenure on sites, increasing the number of homes delivered on smaller sites and a diversity of types of housing on sites as option to increase the speed of delivery of housing. 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 and three bed properties on fully built out sites but there was a fair distribution across other sizes of dwelling. Houses account for around two-thirds of dwellings on these sites in both years. 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, and any further evidence base work. 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 strategic sites and locations that could be allocated as part of the spatial strategy for the new local plan will also provide a wide mix of housing.

Table 3: Completions (gross) on large sites by property type and number of bedrooms 2021/22 and 2022/23
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 or not started

Number of bedrooms	Houses 2021/22	Flats 2021/22	House 2022/23	Flats 2022/23	Totals
One	0	76	12	158	246
Two	17	57	155	136	365
Three	90	0	293	0	383
Four or more	144	0	154	0	298
Total	251	133	614	294	
Total % split	65%	35%	68%	32%	

Table 4 Affordable Completions (gross by property type and number of bedrooms 2019/20)

Number of bedrooms	Houses/ Bungalows 2021/22	Flats 2021/22	Houses/ Bungalows 2022/23	Flats 2022/23	Totals
One	2	64	9	37	112
Two	18	57	25	34	134
Three	46	0	46	0	92
Four or more	5	0	21	0	26
Total	71	121	101	71	
Total % split	37%	63%	37%	63%	

- 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. 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 saw 193 flats built for the private rented sector (PRS), alongside flats delivered for market 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 The diversity of sites being delivered in Medway has fluctuated in recent years. 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. In 2021/22 and 2022/23, it reduced and one-third of development was permitted on greenfield sites. Completions in the same period was roughly 50:50. The decrease in the number of permissions that the Council has granted for houses on greenfield sites, outside of current Local Plan development boundaries could indicate a slow down on the number of houses being built in a few years' time, in a reverse of the increase it facilitated when a larger proportion of housing development was on greenfield sites. They will have been difficult decisions taken by the Planning Committee but the increase in delivery numbers can be seen, as evidenced by Medway's recent sustained increase in delivery performance. The allocation of sites across Medway will be a core part of the new Local Plan strategy and will address this issue and some of the strategic constraints that are delaying or stopping development being approved or coming forward.

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. To date there are four schemes which have been granted planning permission to deliver 18 units specifically for self-build units, with one site (of 6 dwellings) now completely built out. The remaining three sites are not yet started, although one site of 5 dwellings has sold all but one plot and submitted reserved matters applications for two of them. A package approach (consisting of a percentage requirement on sites above a certain threshold, specific site allocations and general encouragement and support for windfall sites in suitable and sustainable locations) to provide opportunities for self build plots will be included within policies of the new Local Plan which will be consulted on as part of the Regulation 18 stage in summer 2024. Neighbourhood plans in Medway are also considering opportunities for self-build and local needs housing.

Role of Affordable housing

3.62 In 2021/22, the number of gross completions of affordable housing was 192 units being 17% of completions in that year. For 2022/23, it was 172 units and 18%. This is only slightly lower than in 2020/21, which saw gross completions of affordable housing at 216 units which was 19% of the number of gross housing completions, but is down from 27% in the previous year. 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, as does the CMA report which has seen housebuilder internal documents which suggest affordable homes, and other tenure types, can be supplied at a faster rate or in addition to pr. 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 A more recent problem and greater concern is that developers have reported problems with securing registered providers for all but the largest of sites. Registered providers have a number of existing estate issues they are dealing with including cladding, mould and retrofitting carbon reducing technologies and are showing interest in sites with at least 100 affordable homes. In Medway, that would mean a site of at least 400 homes which is larger than most sites. In the past this was a problem with just the smallest sites and so confined the problem to fewer homes. This newer problem could impact the delivery of a lot more homes and even when a registered provider agrees to take on the site, there are delays to starting on site whilst resolving that problem.
- 3.66 Medway planning and housing officers attend an Affordable Housing Roundtable group that is hosted by a local planning consultancy and chaired by the chair of the Kent Developers Group. The meetings are very well attended with representatives from many local councils, particularly those facing this problem, registered providers, developers including some volume housebuilders and SMEs, and occasionally Homes England representatives. There are many frustrations from all parties that this is a sign of market failure that needs addressing urgently. Attendees have cited structural problems with grant funding of affordable housing. Developers, in particular SMEs, have repeatedly stated they want to provide affordable housing on their sites, instead of offering commuted sums or off site affordable housing, to ensure they are delivering mixed and balanced communities. As noted already, their backers will often not release finance until a registered provider is secured. Local authorities are working towards a variety of solutions that might help for the time being, but this is an issue that needs to be addressed by DLUHC.
- 3.67 Medway has worked with a local, prominent in the market, SME to remove the affordable housing requirement from S106s on two sites so that the developer can secure a registered provider on these sites. Registered providers do not receive grant funding for new homes that are being built as the affordable housing policy compliant element of a site secured via a S106. With the other pressures they are addressing in their existing housing, this is often resulting in no offers to purchase the affordable housing of a site, particularly affecting medium sized sites. Therefore, by removing them from the S106, the registered provider can apply for grant funding so are more likely to make an offer and take some units. This is a risky strategy, and the Council has only pursued this with a developer who has a track record of delivering housing in Medway. The developer provided a letter of assurance, outside the amended S106, that they had secured a deal with a registered provider and if that fell through, they would provide a commuted sum instead. They also provided evidence of the agreement with the registered provider. Deeds of variation to this effect have been signed on these sites. This is an interim solution, and not one that is sustainable.

3.68 The government introduced the First Homes policy in 2021 with an early delivery programme. Medway Development Company successfully bid for funding from this programme and in 2022/23 delivered the first 17 first homes and another 46 in 2023/24 (to be confirmed by the monitoring survey for the AMR) at their Garrison Point and Chatham Waterfront schemes. Persimmon also delivered five at the Colonial House scheme. Two more have come outside the early delivery programme at a site in High Halstow for 35 homes. The homes are discounted by 30% of market value and capped at a cost of £250,000. Developers have reported problems with delivering these and it is notable that only two have been granted permission in Medway outside the government granted funded scheme. First homes are provided as a discounted market housing product which reduces the number of affordable homes that a registered provider can take on, further reducing the attractiveness of affordable homes secured as part of a planning permission. The new local plan will include first homes in its policies, as it is government policy. There is some desire to ensure there is a local connection test for these types of homes.

Leadership, Entrepreneurism and Attraction

3.69 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.

Regeneration

3.70 The Council is updating its Medway 2035 Regeneration Strategy and wider suite of supporting thematic strategies and action plans. This sets out the regeneration aims and objectives for Medway across six priority areas – destination and placemaking; inward investment; innovation; business accommodation and digital connectivity; sector growth; improving employability.

3.71 The Regeneration service has secured investment in infrastructure over recent years to enable and promote development to deliver the Council's regeneration ambitions.

3.72 The wider Council has also secured investment to boost confidence in Medway and deliver new programmes and encourage sustainable development. These include the DLUHC funded pilot Chatham Design Code, the Chatham Intra High Street Heritage Action Zone and its Development Framework, and the priority investment in Medway for heritage and arts. There is a corporate initiative to boost the performance of Gillingham town centre.

3.73 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.

3.74 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.

Communication with landowners, developers, agents and registered providers

- 3.75 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.
- 3.76 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.
- 3.77 The Chief Planning Officer 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 DLUHC to discuss deliverability.
- 3.78 In November 2019, the Chief Planning Officer 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 a need to promote small to medium sites across Medway to achieve the level of delivery required.

3.79 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

3.80 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.

3.81 Since its creation in 2018, MDC has progressed 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 is complete and almost completely occupied. At Chatham Waterfront, the first units have been occupied and completion is expected in 2024. Both schemes are part of the First Homes early delivery programme.

3.82 The company's next projects include the redevelopment of Mountbatten House, Chatham and the former Civic Centre site, Strood. Mountbatten House got planning permission for 164 units at the end of April 2021 and is currently seeking amendments to the scheme. There is also an application under consideration for 195 residential units at the former Civic Centre site, following a public consultation.

3.83 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

3.84 In addition to MDC, Medway Council is also directly delivering housing using its Housing Revenue Account. Last year, the team completed 28 new homes across three sites in Twydall, Gillingham. This follows on from a scheme providing six bungalows in Twydall, and 32 bungalows at Centenary Gardens, let to council tenants designed to meet specialist needs. This again shows the Council's commitment to

intervene in the market and allows the Council to deliver the homes that meet residents' needs.

3.85 The team is working on the delivery of another couple of sites in Gillingham with 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

3.86 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 and extension 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

3.87 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. 20 social rent houses were completed in October 2023 in Rainham and their delivery was supported by affordable housing commuted sums. There are ongoing discussions on how to use commuted sums for the delivery of more 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

3.88 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 which has subsequently been refreshed in 2021. 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. Some developers have identified a shortage of construction workers as a barrier to development. The Regeneration team have a skills and employability team who facilitates the implementation of the plan with the aim of increasing the number of people within Medway with the relevant skills. This is done in partnership with a variety of organisations, particularly the local college who offer construction skills training.

- 3.89 There is direct support available to developers in the form of tailored skills plans, considering a wide variety of early careers initiatives. The Council also has good links with local training providers and educators. The Council's Head of Skill and Employment will attend this year's major developer forum, hosted by the Planning Service, to listen to the views of developers on this issue.
- 3.90 The Council opened a learning skill and employment hub, run by Medway Adult Education, 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 has updated the Local Development Scheme. A Regulation 18 consultation took place at the end of 2023 and there will be another one in summer 2024.</p> <p>Publication will give further clarity on proposed allocations and phasing of development.</p>	<p>Planning Policy team</p>

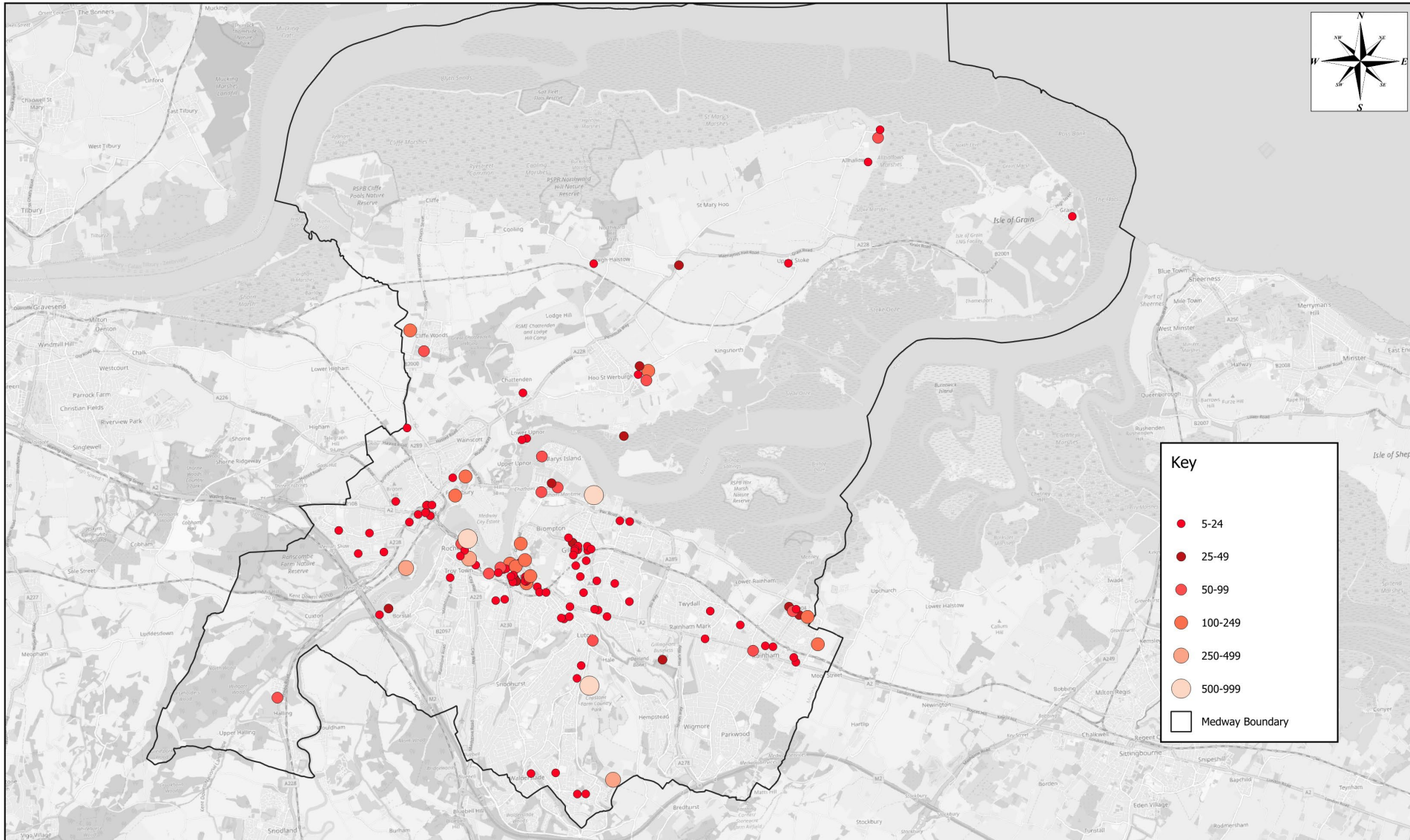
Review of development management processes	<p>Review processes for condition discharge review options for flexible condition for materials</p> <p>Encouraging increased use of PPAs and consideration of specific application type PPAs such as discharge of conditions</p> <p>Review process associated with 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
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				
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				Planning and Housing

for delivery of affordable housing				
Empty Homes Strategy	Proportionally high level of empty properties in Medway indicates need to address the issue.	On going	Trialling Kent County Council's 'No Use Empty Scheme' to provide loans to support bringing empty properties back into use.	DM Team
HRA delivery	Additional local authority housing will support overall delivery of housing	Ongoing	A few sites have planning permission with expected delivery timescales of 1-2 years. Purchase of units from local developer who is interested in collaboratively working with the council. Work ongoing to secure additional sites.	Housing and Regeneration teams
First Homes	Allocation of sites. Monitoring of delivery. Dialogue with developers.	On going	New policies Dialogue with developers.	Planning Service
Leadership, entrepreneurship and attraction				
Continue engagement processes between Planning Service	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.	Planning Service

and development sector.			Delivery rates and issues obtained through monitoring.	
Continuing delivery of place-making programme and implementation of Medway regeneration strategy		On-going with annual review in service plans.	Implementation of Medway 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 will be presented to Cabinet on 4 June 2024.
- 5.2 The Chief Planning Officer 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.
- 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



Pipeline of sites with planning permissions for housing

Info: All sites of 5 or more units

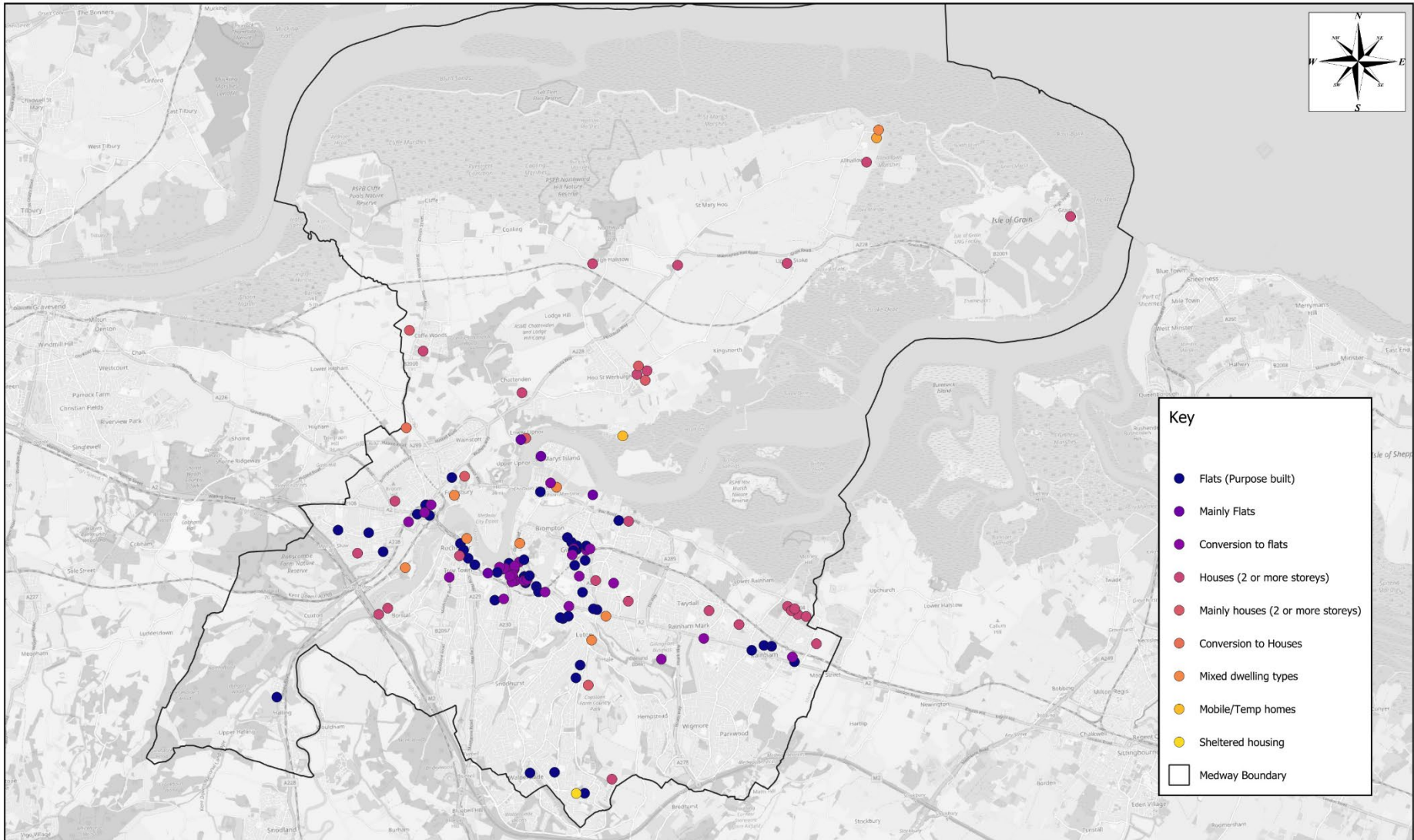
Point data has been used to represent the developments as some of these sites are very small and would not be legible as polygons on a map.

Please refer to the key as the different coloured points represent different data

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Scale: 1:12000 17.05.2024



Key

- Flats (Purpose built)
- Mainly Flats
- Conversion to flats
- Houses (2 or more storeys)
- Mainly houses (2 or more storeys)
- Conversion to Houses
- Mixed dwelling types
- Mobile/Temp homes
- Sheltered housing
- Medway Boundary

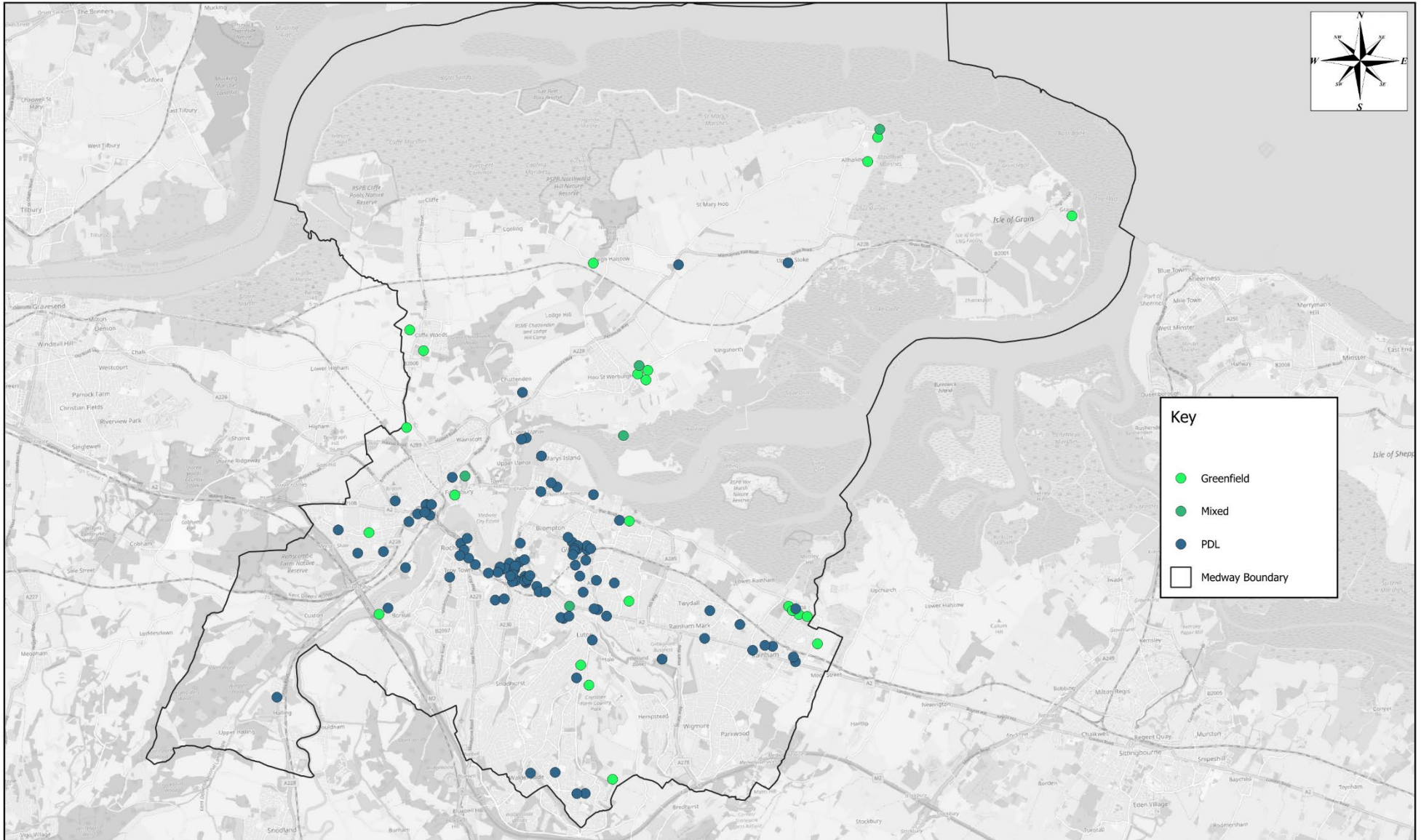
Housing Mix in residential development pipeline

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 17.05.2024



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

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.

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Scale: 1:12000 17.05.2024