



Medway Housing Delivery Test Action Plan 2025

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Executive Summary

This is Medway Council's sixth 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 2024 because delivery was below the 95% threshold. This is despite the highest rates of housing delivery in Medway's history sustained for five years.

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 successive governments' agendas to increase housing supply.

This action plan:

- Considers Medway's development context and reviews historic performance on housing delivery.
- Lists measures the Council has already adopted to monitor and encourage housing delivery.
- Reviews actions supporting delivery from the last plan.
- Proposes measures to contribute to increasing the amount of new housing delivered.
- Sets out measures to continue monitoring housing delivery and understanding the factors influencing delivery rates.
- Includes a timetable to review the action 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) 2023/24. 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 reviews the measures implemented to support the delivery of housing and details progression of actions in the 2024 Action Plan, as well as other activities the Council has undertaken this year that will support housing delivery.

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, and more recent trends are showing declines in applications. The defined local housing need is significant, 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 2023, published on 12 December 2024. An updated [National Planning Policy Framework](#) (NPPF) was published at the same time. The Housing Delivery Test (HDT) is a measure that looks at past performance on housing delivery. The action plan responds to this, considering past activity in the development sector and housing market, and council actions and performance. It also looks forwards identifying potential issues around future delivery and forecasting how delivery will change over time. 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 continues to sit within the context of the government's agenda to boost the supply of housing. The requirement on local planning authorities to produce an action plan arose from updates to national planning policy in 2018. The council must report on its analysis of the reasons why rates of housebuilding have not met the levels of identified housing needs for the area, and set out actions to address these issues, with the aim of boosting the delivery of housing. This is the sixth action plan that the council has produced.
- 1.3 The development of housing and lack of supply has been a topic of discussion and debate for many years. The current government has set itself a target of delivering 1.5 million during this parliament. This follows similar, although lower, targets of previous governments. This represents a continued need to significantly boost the speed and amount of housing being built.
- 1.4 A number of measures and reforms that governments have 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. 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. It is a backward-looking measure that compares the number of new homes delivered over the previous three years with the authority's housing requirement. Full details of the method of calculating the HDT are specified within the [Housing Delivery Test Rule Book](#) and the PPG. As the adopted housing requirement in Medway is more than five years old (through the Medway Local Plan 2003), the council's HDT has been assessed against the minimum annual local housing need figure calculated using the '[standard method](#)', as defined by government data.
- 1.7 A series of sanctions will apply when the test results show that housing delivery fell below the housing requirement in those three years, and this will depend on the level of shortfall. The sanctions apply in all years 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 got a result of 72% in December 2024. This means that an action plan should be prepared, a buffer of 20% should be applied to the local housing need and a presumption in favour of sustainable development applies. This will apply until the next HDT measurement which is likely to be published at the end of 2025.

Preparation of the action plan

- 1.9 Medway Council has recognised the importance of housing delivery for many years and a priority within the [One Medway Council Plan 2024](#) is '[living in good-quality, affordable homes](#)' which includes 'increasing the supply of good quality, energy efficient and sustainable homes' and to 'implement a Local Plan'. 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 an intention to publish a Regulation 19 draft local plan in the summer of 2025.
- 1.10 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 collation of data from council tax and building control records, borough wide site surveys and seeks specific information from developers on the timing and phasing of housing delivery on large sites. 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, survey and monitoring work is currently underway for 2024/25 will be used in the AMR to be published in December 2025.

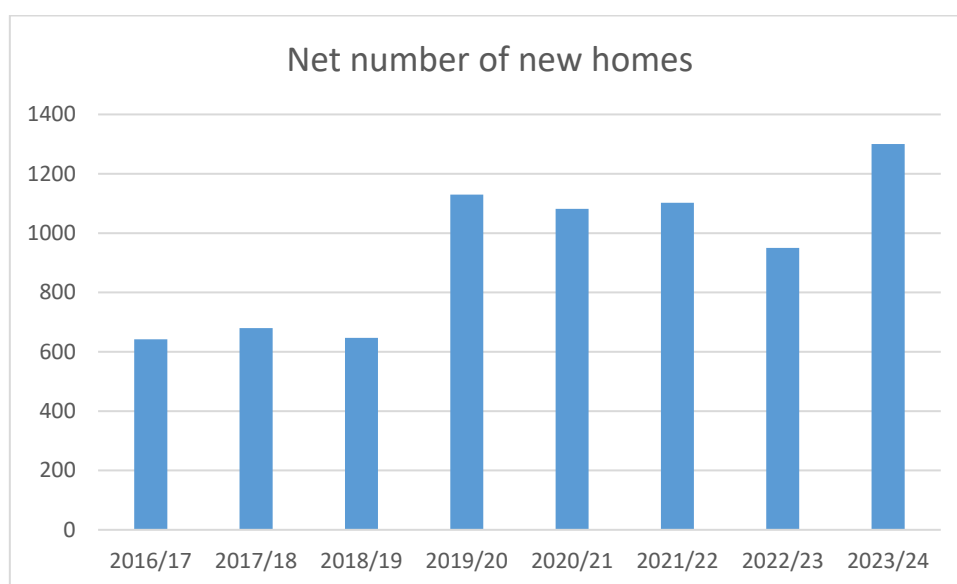
1.11 Previous action plans have identified the publication of a new Local Plan as the key measure the Council can take to help direct the delivery of housing in Medway. This action plan is scheduled to be published just ahead of the draft plan and work has been focused on preparation of the plan including work on strategic sites and housing allocations policies. The Council will publish further information relating to housing delivery to support the local plan process ahead of submission to the Secretary of State. This will include information on the work that has gone into preparing the housing policies and allocations for the plan including how it has used evidence such as Lichfield's [Start to Finish](#), the [Land Availability Assessment](#), a local housing needs assessment and internal information gathering through regular monitoring work.

1.12 This action plan:

- Considers Medway's development context and reviews historic performance on housing delivery.
- Lists measures the Council has already adopted to monitor and encourage housing delivery.
- Reviews actions supporting delivery from the last plan.
- Proposes measures to contribute to increasing the amount of new housing delivered.
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2 Context

- 2.1 Medway has changed significantly over the past few decades, with regeneration and new infrastructure contributing to the development of the area. It is a diverse and complex area. Medway is one of the largest urban areas in the south east of England 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 recent years in the net number of homes delivered from 647 in 2018/19 to 1,300 in 2023/24. This increase has been sustained across a number of years and notable because it has been achieved against a backdrop of 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 Council has reviewed Lichfield's' [Start to Finish](#) which provides further analysis on build out rates and factors that might affect the pace of delivery. This has been used to inform work that has been undertaken to support the preparation of the new Local Plan and policies relating to housing 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. Many of 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 sites and the diversity of housing types are all matters that will potentially be addressed through policies in the new Local Plan.

- 2.4 As successive Governments have promoted agendas to boost housebuilding, reforms to the planning system have been introduced, in an attempt to speed up the delivery of housing and infrastructure. There have been five versions of the NPPF since the introduction of the HDT. There has also been legislation that has introduced changes to the planning system. Currently, the Planning and Infrastructure Bill is at committee stage in parliament.
- 2.5 Developers have reported that conditions for delivering their projects have been difficult over the past few years and much of 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.
- 2.6 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.

Past performance on housing delivery

- 2.7 The latest HDT measurement was published in December 2024 (2023 measurement) and showed that rates of housebuilding delivered in Medway in the preceding three years were 72% of the defined housing requirement, calculated using the method in the Housing Delivery Test Rule Book.

	2020-21	2021-22	2022-23	Total	Percentage result
Number of homes required	1,110	1,586	1,675	4,371	72%
Number of homes delivered	1,075	1,121	961	3,157	

Table 1 Medway's data taken from the published measurement

- 2.8 The decrease reflects a lower number of units delivered in 2022/23 compared with the previous two years. Even so, for Medway this is still significantly above its historic average and 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; land south of Stoke Road, Hoo; Land off Otterham Quay Lane, Rainham, 2 sites off Lower Rainham Road, Rainham and land off Mierscourt Road, Rainham 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 development in Medway on appropriate green field sites. 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.
- 2.9 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, followed by the North Kent Strategic Housing and Economic Needs Assessment (SHENA) in 2015 that calculated the need figure at 1,213. It increased with the introduction of the standard method, the formula for the standard method changed with the publication of the most recent NPPF and it is now 1,619 dwellings per year needed to meet the five-year housing land supply but increases to 1,943 when a buffer of 20% is added due to past under delivery identified by the HDT. There are slight variations each year due to changes in the data used to calculate the local housing need figure. The current standard method uses existing dwelling stock in the

area as the baseline and it is adjusted based on the median workplace-based affordability ratios. The datasets for this calculation are published in March and May. The Council has commissioned a local housing needs assessment as part of the evidence base for the new Local Plan.

- 2.10 The following table shows the number of dwellings under construction and those with planning permission but not yet started upto the end of March 2024. There are some sites that fall into both categories because part of the site will be under construction, but later phases have not started. This mostly happen on larger developments, for example, Rochester Riverside has permission for a total of 1,473 homes with 489 complete, 255 with detailed permission with 13 complete, 62 under construction and 180 not started, and a further 656 without detailed permission and not started as of 31 March 2024. The number of extant permissions stayed fairly constant in the preceding five years with a slight dip in the last year so it has a minimal effect on 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.

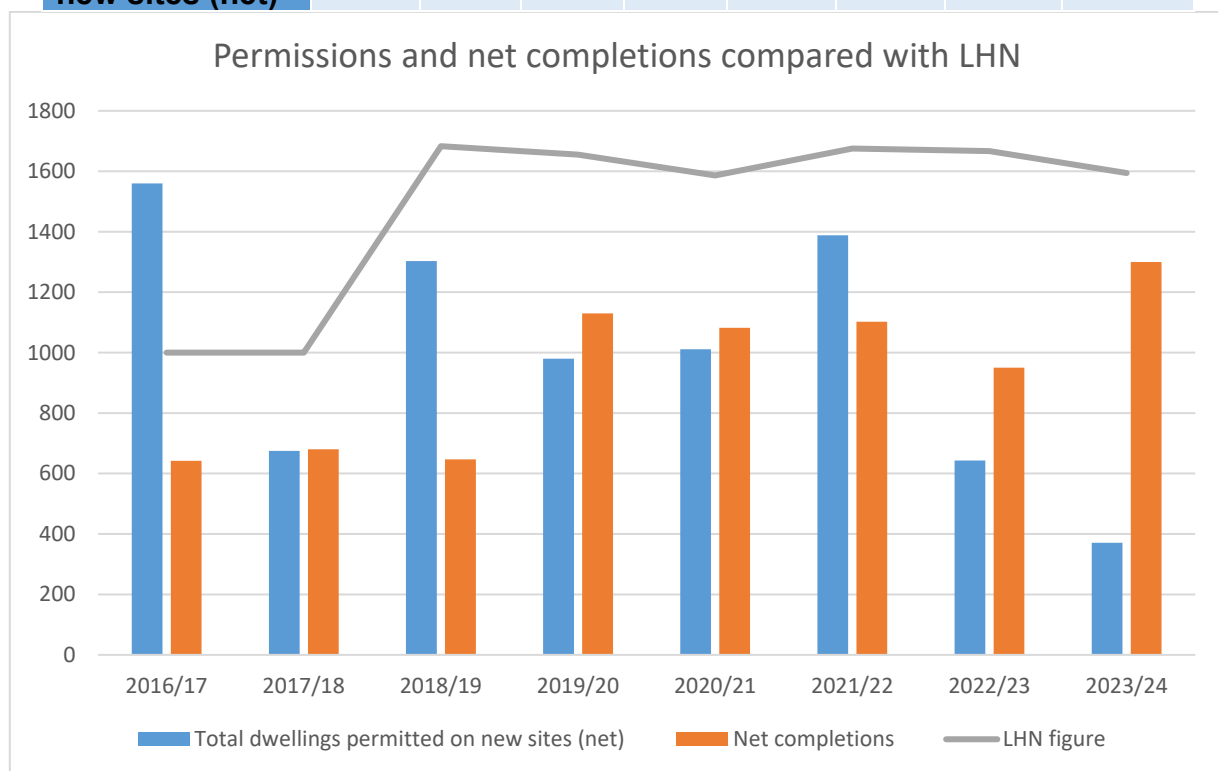
	2018/19	2019/20	2020/21	2021//22	2022/23	2023/24
Extant permissions not started (net)	6587	6350	6045	6448	5850	5874
Extant permissions under construction (net)	1486	1629	1925	1757	2061	1328
Total	8073	7979	7970	8205	7911	7202

Table 2: number of dwellings under construction and not started at end of monitoring year 2023/24

- 2.11 The number of permissions granted on new sites in the last year (2023/24) is lower than the preceding five years. As reported in the AMR, there was a decrease in the number of dwellings permitted on new sites in 2023/24 with only two schemes of over 50 dwellings being permitted during that year and none over 100 dwellings. This reflects a sustained decrease in the overall number of applications received since 2022/23 compared with the previous five years. Although monitoring for the AMR is ongoing so the total number of permissions on new sites for 2024/25 is not yet confirmed, research undertaken for this action plan shows that there were no permissions on new sites of more than 50 dwellings. However, there are some emerging larger consented sites that are pending completion of Section 106s. There are currently too few permissions for new dwellings 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.

	2016 - 2017	2017 - 2018	2018 - 2019	2019 - 2020	2020 - 2021	2021 - 2022	2022 - 2023	2023- 2024
No of permissions on new sites	109	114	104	117	102	88	86	85
Large/windfall dwellings (net)	1447	543	1217	846	912	1317	569	312
Small dwellings (net)	113	132	86	134	99	71	74	74
Total dwellings permitted on new sites (net)	1560	675	1303	980	1,011	1,388	643	371



2.12 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. 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.

Housing Delivery Test projections

- 2.13 The [NPPE](#) 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.
- 2.14 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 necessary 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.
- 2.15 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.
- 2.16 The table below sets out this year's result and predicted delivery rates in coming years. This year's result was as expected. The predicted results for the coming years are lower when compared with the predictions in the last HDTAP but this is mostly to do with the pipeline of sites available for delivery as presented in the latest AMR, as this information is used to update the predictions. Previously, sites identified in the Strategic Land Availability Assessment published in December 2019 formed part of the phasing of housing delivery. However this information did not form part of phasing for the last two years because of ongoing work on the new Local Plan, including call for sites, Land Availability Assessment and the Regulation 18 consultations. Work has continued in preparation for publication of the draft Local Plan which will provide for spatial growth including allocation of housing sites. The predictions can be updated following the publication of the Regulation 19 plan, and its housing trajectory.

2021	2023	2024	2025	2026	2027
79%	72%	69%	73%	76%	83%
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, 20% buffer and presumption in favour of sustainable development	Action plan and 20% buffer	Action plan and 20% buffer

Measurement year	Year 1	Year 2	Year 3	No. of homes required	Year 1	Year 2	Year 3	Number of homes delivered	Result
2022	1550	1110	1586	4245	1181	1067	1124	3372	79%
2023	1110	1586	1675	4371	1075	1121	961	3157	72%
2024	1586	1675	1667	4928	1121	961	1310	3392	69%
2025	1675	1667	1594	4936	961	1310	1339	3610	73%
2026	1667	1594	1619	4855	1310	1339	1054	3703	76%
2027	1594	1619	1619	4782	1339	1054	1636	4029	83%

Tables 4&5 - The above two tables include the results published in the 2023 HDT measurement 2020-2023. It also includes projections on delivery based on the housing trajectory in the AMR 2023/24 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.

2.17 The 2024 measurement is likely to be published at the end of the year. It is possible to accurately calculate the result using the [Housing Delivery Test rule book](#). We expect the result will remain below 75% as it is based on housing delivery for the preceding three years and although it will include 1,310 homes for 2023/24, it will also include the 961 homes delivered in 2022/23. Considering Medway was below 60% prior to 2020, this is still a considerable achievement and a step change in the rates of delivery in the borough.

2.18 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, 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 1.5 million homes during this parliament. 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 has been some support for mortgage products with lower deposit requirements. However, these are against a backdrop of increased interest rates on mortgages. Private rents have seen significant increases as well with high competition for limited stock. The Council also faces significant need for affordable housing and temporary accommodation costs have risen.

- 2.19 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. There have been some developer interviews following the Regulation 18 consultation and review of the Land Availability Assessment to assist in work towards housing delivery policies.

3 Actions supporting Housing Delivery

Medway Local Plan

- 3.1 The main measure identified in previous actions plans that the Council can use to support the delivery of housing, is the publication of a new Local Plan. Providing direction and identifying a healthy land supply is a significant tool for the Council to provide certainty on development in Medway. Therefore, the focus of the Planning Policy team has been to work towards this goal.
- 3.2 The Council updated its Local Development Scheme in December 2024. This sets out the timetable for the new Local Plan. The Council plans to publish a Regulation 19 pre-submission draft local plan in June 2025, with consultation following that in July/August 2025, followed by submission to the Secretary of State at the end of the year.
- 3.3 Since the last action plan, a Regulation 18 consultation was undertaken in Summer 2024 on the reasonable alternatives of the spatial strategy and draft policies which will provide greater certainty on the direction of the planned growth in Medway up to 2041. The consultation included details of sites and broad locations that could meet Medway's development needs over the plan period. The consultation document included three options for 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 Since the Regulation 18 consultation, the Council has been working on updating the evidence base for the Local Plan and finalising the preferred spatial strategy and policy framework to manage Medway's growth. This has included a Local Housing Needs Assessment which sets out the range and mix of housing needed in Medway, including for different types of households and residents. The emerging plan has also accompanied by a Viability Assessment, which has considered the delivery of sites and housing types across Medway. All sites and broad locations for development have been further assessed through the Sustainability Assessment, and Habitat

Regulations Assessment. A housing trajectory showing the projected annual housing delivery rate for individual sites identified in the preferred spatial strategy has been prepared with reference to best practice, such as Lichfields' Start to Finish, and engagement with the development sector.

- 3.5 The Council has been 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 has informed the final selection of sites and site allocation policies.
- 3.6 The team have reviewed Lichfield's 'Start to Finish' to understand expected delivery rates for different types of sites and typologies to help inform them of the likely delivery of preferred sites. This is coupled with the information collected from developers and landowners and the data and intelligence of work already being carried out by the team in monitoring delivery of development in Medway.
- 3.7 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

- 3.8 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.
- 3.9 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 has informed the site selection process for the new Local Plan, together with the Sustainability Appraisal and Habitat Regulations Assessment.

Local Housing Needs Assessment

- 3.10 A local housing needs assessment has been completed as part of the evidence base for the local plan process. This provides new evidence that reflects the current market situation. It has assessed the specific characteristics of housing need in Medway, including the need for affordable housing and specialist accommodation.

Viability Assessment

3.11 The Draft Local Plan will be accompanied by an updated Viability Assessment. This has taken account of current market conditions, and the policy requirements on developers. This includes consideration of infrastructure contributions, that are required to mitigate the impacts of development, and to deliver sustainable growth. These requirements, including strategic transport mitigations, are set out in the Infrastructure Delivery Plan, and reflected in the update to the Developers Contributions Guide.

Supporting housing delivery review

3.12 Previous action plans have explored how the Council is supporting delivery in a variety of ways by looking at processes, supply and demand issues and leadership. This informed the root cause analysis of housing delivery in Medway. It identified many areas that the Planning Service and wider council have been progressing that either directly or indirectly supports the delivery of housing. Much of this work continues and a summary of actions is listed below.

Measure supporting housing delivery	Review/update
Resourcing the Planning Service	<ul style="list-style-type: none"> • Restructured service in 2024 to better manage resources and encourage retention • Council wide measures introduced to address staff retention issues • Support of training including towards professional qualifications such as planning degrees • Additional resourcing for Local Plan work
Efficient decision making in development management	<ul style="list-style-type: none"> • Quarterly reporting to Planning Committee including benchmarking • The team continue to exceed national targets
Pre application service	<ul style="list-style-type: none"> • Comprehensive, chargeable service provided including opportunity for face to face and onsite meetings • Development team approach including urban design, landscape, heritage, highways, environmental protection, and flooding • Member presentations
Planning Performance Agreements	<ul style="list-style-type: none"> • Established quality assured management programme

Measure supporting housing delivery	Review/update
	<ul style="list-style-type: none"> • Priority service that reinvests in staffing of development management team and specialist consultants
Planning conditions	<ul style="list-style-type: none"> • Agreement of precommencement conditions with applicant team prior to issuing decision • Early identification of acceptability of materials • Keep under review the efficiency of planning condition discharge
Developer Contributions	<ul style="list-style-type: none"> • Ongoing work to update Developer Contributions Guide as part of new Local Plan to provide certainty on S106 costs • Use of standard templates • Triggers for contributions spread across the delivery timetable, bespoke to each agreement
Brownfield Land Register	<ul style="list-style-type: none"> • Updated Brownfield Land Register published in January 2025
Development briefs and design guidance	<ul style="list-style-type: none"> • Adoption of Chatham Design Code in 2024 • Production of Chatham Intra Heritage Action Zone Development Framework and consultation • Intention to produce development briefs and design guidance linked to Local Plan allocations
Empty Homes	<ul style="list-style-type: none"> • Derelict and Empty Properties Officer employed to address long term problem properties • Derelict and Empty Properties Strategy • Developers list shared with empty property owners
Engagement with the development sector	<ul style="list-style-type: none"> • Medway is a signatory to the Planning Protocol in Kent and Medway • Four commitments which promote collaborative working between developers and local authorities • Aim to deliver an environment for quality and sustainable growth to meet employment and housing needs • Annual major developer and agents' forums
Supporting SMEs	<ul style="list-style-type: none"> • Chief Planning Officer invited to alternate local SME developer forum meetings

Measure supporting housing delivery	Review/update
	<ul style="list-style-type: none"> • Small sites and SME housebuilders policy drafted for new Local Plan
Affordable Housing	<ul style="list-style-type: none"> • Housing Strategy to 2030 including how to increase affordable homes in Medway • Regular attendance by housing and planning at an affordable housing roundtable • Solutions devised to support delivery of S106 agreed affordable homes • Commuted sums used to deliver additional affordable housing
Council led housing delivery	<ul style="list-style-type: none"> • Medway Development Company continues to develop sites with completion at Garrison Point, ongoing delivery at Chatham Waterfront and progressing delivery at Mountbatten House • Housing Revenue Account – continued delivery of homes including development at Lennox Wood and Aburound House • Temporary accommodation acquisition programme – purchasing of temporary accommodation, acquiring leases and set-up of an internal lettings department
Regeneration	<ul style="list-style-type: none"> • Medway 2041 Regeneration Strategy • Regeneration projects completed and underway in Chatham, Rochester and Strood • Love Gillingham project and Gillingham Community Panel • Greenspace projects • UK Shared Prosperity Fund • High Street Heritage Action Zone • Rainham Feasibility Study
Skills and employability	<ul style="list-style-type: none"> • Skills and Employability Plan • Business and Skill Showcase – first event in 2024, coming back for 2025

3.14 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				
Preparation of new Local Plan	<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 second Regulation 18 consultation took place in July & August 2024. A consultation on a Regulation 19 pre-submission draft local plan will take place in the summer of 2025.</p> <p>Publication will give further clarity on proposed allocations and phasing of development.</p>	Planning Policy team

Review of development management processes	Encouraging increased use of PPAs and consideration of specific application type PPAs such as discharge of conditions Review of Development Management decision making processes	Ongoing work and feed into annual service plans	Conditions data indicates generally timely decisions are being made. Ongoing consideration of flexible condition for materials. Officers have continued to promote PPAs which supports timely decision making. Updated ISO procedure to be adopted and audited independently.	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 and temporary accommodation 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
Leadership, entrepreneurship and attraction				
Continue engagement processes between Planning Service and development sector.	Continuing to support the development sector in Medway to deliver sites efficiently and identify issues in a timely manner.	On going	Continuation of breakfast meetings. SME forum established. Delivery rates and issues obtained through monitoring.	Planning Service
Continuing delivery of place-making programme and		On-going with annual review	Implementation of Medway regeneration strategy	Corporate services

implementation of Medway regeneration strategy		in service plans.		
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4 Project management and monitoring arrangements

- 4.1 The Council has an ambitious vision for Medway's sustainable growth. There is corporate commitment to securing housing delivery.
- 4.2 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.
- 4.3 The action plan feeds into the service's work programme.
- 4.4 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