



Planning Committee

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Medway Housing Delivery Test Action Plan

Report from: Mark Breathwick, Assistant Director Culture and Community

Author: Catherine Smith, Head of Planning Policy
Rachel Flintoft, Section 106 Officer
Dave Harris, Chief Planning Officer

Summary

The report sets out details of the Medway Housing Delivery Test Action plan that considers measures to help boost the supply of housing in Medway.

1. Recommendation

1.1. The Committee is asked to note the Medway Housing Delivery Test Action Plan.

2. Budget and policy framework

2.1. There are no policy framework decisions arriving directly from this report. The Housing Delivery Test Action Plan (HDTAP) was approved by Cabinet on 3 June 2025. This is an information item for the Planning Committee.

2.2. The government requires councils to prepare a Housing Delivery Test action plan where rates of housebuilding fall beneath defined targets. This decision is within the Council's policy framework. The report has been prepared using existing resources in the Planning Service.

3. Background

3.1. The government has made the delivery of housing a key aim of its administration. Ongoing reform of the planning system has sought to boost the supply of housing. This included the Housing Delivery Test (HDT), introduced in 2018, that measures the delivery of housing in a local authority area against its defined level of housing need. The test compares the net number of homes delivered over the preceding three years to the housing requirement for the same period. The intention is to encourage local planning authorities to take action to address the causes of under delivery of housing.

3.2. The [2023 HDT measurement](#) was published in December 2024, and it gave Medway a result of 72% delivery against its defined level of housing need, based on the government's standard method formula, covering the period from April 2020 to March 2023. The following table shows Medway's data taken from the published measurement.

	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	

3.3. A series of sanctions apply when the test results show that housing delivery fell below the housing requirement in the three years being measured, and the sanctions imposed 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 the 5-year housing land supply and an action plan.
- Below 75% - a presumption in favour of sustainable development, a 20% buffer and an action plan.

3.4 As the result is below 75%, Medway Council is required to produce a HDTAP, apply a 20% buffer to the five-year housing land supply and apply a presumption in favour of sustainable development when determining planning applications. Although the result is below the 2023 result, it still compares favourably to the scores achieved in the first year of the HDT which was just 47% and delivery rates have grown considerably since that point.

3.5 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 few 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, Chatham Waterfront, Garrison Point 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.

3.6 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 draft Local Plan, including call for sites, Land Availability Assessment and the Regulation 18 consultations. Work continued in preparation for publication of the draft Local Plan which provides for spatial growth including allocation of housing sites. The predictions will be updated following the publication of the Regulation 19 plan, and its housing trajectory, in the next HDTAP.

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

3.7 The 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 from the last plan and their impact.
- Has gathered evidence on strategic sites with planning permission to understand the build out rate and barriers that are preventing these homes being built at a quicker rate.
- Proposes measures to contribute to increasing the amount and speed of delivery of new housing.
- Sets out measure to continue monitoring housing delivery and understanding the factors influencing delivery rates.
- Includes a timetable to review the action plan.

3.8 The action plan has 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. It was published just ahead of the new Local Plan and work has been focused on preparation of that 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.

- 3.9 Previous action plans have also 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 and reviewed in the action plan.
- 3.10 When the HDT was first introduced, there was a degree of frustration amongst local planning authorities that the Housing Delivery Test, and associated requirements for the five-year housing land supply, penalise councils for matters outside their control. It also seems unclear how applying a 20% buffer to the need figure of an authority that is already unable to meet its identified housing needs will in itself boost the delivery of housing. Councils plans for housing land but have only a limited role in the delivery of housing. The action plan briefly considers wider societal impacts on housebuilding but those impacts cannot be effectively addressed through the action plan.
- 3.11 The HDT consequences apply following the annual publication of the HDT results, at which point they supersede previously published results. The Council expect the next HDT result to be published by the end of the year. As previously explained, we can be certain of the result in advance of publication.

4. Options

- 4.1. This report is submitted for information and updates the committee on the Housing Delivery Test Action Plan.

5. Advice and analysis

- 5.1. This report is submitted for information and the Housing Delivery Test Action Plan was approved by Cabinet on 3 June 2025. The published action plan is presented in Appendix 1.

6. Risk management

- 6.1. The HDTAP has considered a range of factors that can influence rates of housebuilding in Medway. There are a number of external risks, over which the Council has limited control. However, the action plan focuses on areas where the Council is able to exercise influence locally, including the work of the Planning Service and corporate actions to attract investment and boost confidence in Medway.

Risk	Description	Action to avoid or mitigate risk	Risk rating
Council fails to publish Housing Delivery Test Action Plan 2024	Failure to meet government requirements	Preparation of the Housing Delivery Test Action Plan	CIII
Housebuilding does not meet levels set by Government	Presumption in favour of sustainable development applies, so 'tilted balance' given to development proposals, which may result in further speculative development proposals and loss of appeals.	Production of Local Plan supported by comprehensive evidence base and granting consents for proposals that represent sustainable development in advance of plan.	All

Likelihood	Impact:
A Very likely B Likely C Unlikely D Rare	I Catastrophic II Major III Moderate IV Minor

7. Consultation

7.1. There is no formal requirement for consultation. However, the Planning Service regularly engages with relevant stakeholders and this feeds into the analysis of the action plan. The Council will publicise the Housing Delivery Test Action Plan in meetings with developers, and welcome comments.

8. Climate change implications

8.1. If The Housing Delivery Test Action Plan reports on the measurement of the Housing Delivery Test and sets out actions to promote housing growth. This does not directly address climate change matters. However, there are specific considerations on climate change in the wider work in preparing the Draft Medway Local Plan and in the determination of planning applications in the context of the presumption in favour of sustainable development.

9. Financial implications

9.1. The costs of preparing the Housing Delivery Test Action Plan have been met using staff resources within the Planning Services' approved budget.

10. Legal implications

- 10.1. The Housing Delivery Test Action Plan meets the requirements of the National Planning Policy Framework 2024.

Lead officer contact

Catherine Smith
Head of Planning Policy
Gun Wharf
Telephone: 01634 331358
Email: catherine.smith@medway.gov.uk

Rachel Flintoft
Section 106 Officer
Gun Wharf
Telephone: 01634 331099
Email: rachel.flintoft@medway.gov.uk

Appendices

Medway Housing Delivery Test Action Plan June 2024

Background papers

None