

APPENDIX 2

SME Network Representations to Medway Reg 18 Local Plan (October 2023)

Medway Local Plan 2022-2040

Regulation 18 Consultation – Setting the Direction for Medway 2040

REPRESENTATIONS SUBMITTED BY

THE KENT SME DEVELOPERS NETWORK

October 2023



SME Developer Network
Kent

**MEDWAY COUNCIL
LOCAL PLAN 2022-2040
REGULATION 18 CONSULTATION- SETTING THE DIRECTION OF MEDWAY 2040**

**REPRESENTATIONS SUBMITTED BY
THE KENT SME DEVELOPERS NETWORK**

OCTOBER 2023



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1.0 INTRODUCTION

i) About the Kent SME Developers Network

- 1.1 These representations have been prepared by the Kent SME Developer Network (the Network) - a consortium of Small and Medium (SME) Developers who are located in or operate within Kent and Medway. The Group is currently chaired by Paul Henry, Managing Director of Esquire Developments, an SME Housebuilder based in Longfield near Dartford, Kent.
- 1.2 The Network was formed in November 2019 and presently comprises approximately 30 participants including SME Housebuilders and Developers (of varying size and scale) and Registered Providers. In addition, the Network includes representatives of Local Planning Authorities including Medway Council, Swale Borough Council, Tonbridge and Malling Borough Council, Tunbridge Wells Borough Council and Maidstone Borough Council. It is the intention that the Network grows over time to cover all of Kent including additional SME Developers and Local Planning Authorities and interested bodies.
- 1.3 The Network was set up to provide a platform for SMEs to discuss relevant planning and delivery issues associated with bringing forward smaller developments and to positively and proactively engage with Local Planning Authorities at the plan making and decision taking stages.
- 1.4 The Government has recognised the need to support existing SMEs and encourage more into the market in order to diversify the housing market from the volume housebuilders and generate choice and improve quality of homes being built. The Government has described SMEs as being of 'National Importance'. **Appendix 1** sets out the narrative behind the support and role for SME Housebuilders.
- 1.5 The Network meets on a quarterly basis to discuss and explore relevant SME related issues, including working through planning related matters. Notable attendees at past meetings including Steve Quartermain (prior to his retirement as Chief Planner at the then MHCLG) and Homes England.
- 1.6 In addition to the meetings acting as a discussion platform, the SME Network is also designed to act as a support and mentoring network, where land opportunities can be shared, or



knowledge/experiences drawn from in-house teams in order to help each other and strengthen the SMEs. The Network can also act as a collective voice in the preparation of Local Plans or other consultations - such as this.

1.7 The Network comprises the following:

SME Housebuilders and Developers

- Esquire Developments
- Fernham Homes
- Wealden Homes
- Fernfield Homes
- Meridian Construction
- Aile Homes
- King and Johnstone
- Clarkmores
- Clarendon Homes
- Gillcrest Group
- A&E Property Ltd
- Country House Homes
- Classicus Estates
- Woodcroft Developments
- Provectus Developments
- Penenden Heath Developments
- Grandera Homes
- Windmill Construction
- Jarvis Homes
- Aspire Designer Homes
- Kentish Projects
- Woolbro Homes
- Cooper and Cole
- Hillstone Homes
- RJC New Homes
- Wedgewood Homes
- TG Designer Homes

- Endeavour Construction Limited
- Unique Land

Registered Providers

- Hyde Housing
- MHS

Local Planning Authorities

- Medway Council
- Maidstone Borough Council
- Swale Borough Council
- Tunbridge Wells Borough Council
- Tonbridge and Malling Borough Council
- Dover District Council
- Folkestone District Council
- Canterbury City Council
- Kent County Council

Agents

- Tetlow King Planning
- David Hicken Associates
- Stantec

Others

- Homes England

1.8 The Network welcomes ongoing engagement with Medway Council and any other interested party.

1.9 For clarity, the representation contained in this response relate to the Members of the Network that are SME Housebuilders and Developers and not the Registered Providers, LPAs, Agents or Others.

ii) Content of Representations

1.10 These representations have been prepared by the Network which seek to address strategic matters and general observations relevant to SME Developers. Any site-specific matters will be addressed by individual SMEs within their own representations.

1.11 The representations are structured to respond to each relevant part of the consultation Document.

1.12 In summary the headline points are as follows:

- We query if the Local Plan timeframe is going to enable a 15 year plan period at the point of adoption (the plan will need to be adopted by 2025).
- The Regulation 18 document is extremely light on detail and supporting evidence base. This has limited the opportunity to provide meaningful comments and to help inform the next stage of the Local Plan. This is a pertinent point as the next stage of the Local Plan will be a Regulation 19 consultation - meaning the opportunity for the Council to make amendments prior to submission for Examination will be limited. Given Medway's track record of Local Plan failures, this seems an unnecessary risky strategy.
- We support the broad aims of the vision and objectives but note that 'housing' appears to be downplayed. Given the economic stimulus housing growth has on a local economy and that a number of other aims and objectives flow from housing, this should be placed higher on the agenda in the Local Plan .
- The lack of a LAA assessing each site submitted means it is difficult to comment on the suitability of each spatial strategy.
- We recommend a Regulation 18b Consultation is undertaken before a Regulation 19 stage is proceeded to.
- The level of windfall housing proposed (3,000) is substantial and query if this is appropriate. We note that under Paragraph 69 of the NPPF, there is a need to identify at least 2,900 dwellings on small sites.
- We note the housing requirements are ambitious but query the obvious and unnecessary 'political statement' contained in the document re. the suitability of the Standard Method to calculate housing need. This is current Government Guidance for plan making and a matter that other LPAs have been able to address successfully in their Local Plans. Medway Council is no different.
- There is a general lack of reference to SME housebuilders and how they can help achieve some of the wider objectives and aspirations. This includes climate change and good design – the latter point also being relatively downplayed in the



document – contrary to a central theme/message from Central Government about Building Beautiful.

- We encourage the Council to continue to work with the Network, including the provision of a small sites policy to help support SME developers within the plan period.

2.0 RESPONSE TO THE CONSULTATION DOCUMENT

General Observations

A. Lack of Detail

- 2.1 The Regulation 18 Document is 'light touch' and seeks to indicate a potential direction of growth. However, the document lacks any real or meaningful direction of growth and is lacking the necessary supporting Evidence Base to help understand the suitability of any direction of growth.
- 2.2 By way of example, the document offers 4No. development scenarios and throws 'every site into the ring'. Whilst this is a useful opportunity to understand the sites submitted, there are 2 key issues which mean that it is difficult to offer any meaningful comment:
- 1) No one strategy offers the ability to meet the identified level of growth required. Accordingly, a blended strategy is required. No such blended strategy is however put forward as an option.
 - 2) The lack of a LAA assessing the suitability of sites that underpin each strategy is a significant omission and means that it is impossible to conclude on the suitability of any given strategy. The Local Plan acknowledges that sites are likely to not be taken forward in the next iteration. This means the overall numbers associated with each strategy is incorrect and further uncertainty of the suitability of each strategy.
- 2.3 Whilst we recognise the intent of this document is to offer a direction of travel, the scarcity of any meaningful information is unfortunate and disappointing. A critical issue the Council should consider is that the next iteration of the Local Plan will be the Regulation 19 Consultation. This means that limited changes can be made from this document to the point of submission for examination and only changes relating to the soundness of the plan.
- 2.4 We consider there is a substantial risk to the Council's ability to progress with a sound plan by not providing sufficient evidence base now, or the identification of a preferred/blended strategy and will create a scenario where it seeks to make substantial changes post the Regulation 19 Consultation. Recent nearby LPA's have sought such changes (inc. Maidstone Borough and Tunbridge Wells Borough) only for the Inspectors examining those plans having

queried the suitability of such changes and if they relate to 'soundness' of the plan and if not, why the change is being proposed.

- 2.5 We therefore consider that Medway should undertake a Regulation 18b Consultation, which provides for the preferred strategy plus the alternative blended strategies and this is underpinned by a proper evidence base including a completed LAA, Sustainability Appraisal and Infrastructure Delivery Plan. This will strengthen the Regulation 19 Local Plan and will potentially avoid a protracted examination or potential re-consultation of key soundness matters.

B. Local Plan Time Period

- 2.6 We note the Local Plan has a plan period of 2022 to 2040 – a period of 18 years. However, the NPPF advises under para 22 that Strategic Policies should cover a minimum 15 year period from adoption (our emphasis). This means that in order to achieve the 15 year period, the plan must be adopted in 2025. Given the poor track record of adopting a Local Plan in the past and the length of time accrued since the previous withdrawal of the last local plan to get to this Regulation 18 stage, we question if a Plan will be in place by 2025.
- 2.7 The Local Plan acknowledges there are some fundamental strategic matters to resolve. This includes the highway issue of the M2 Junction, the impact of the Lower Thames Crossing as well as how local infrastructure is to be delivered (in the light of the HiF funding being withdrawn). These are all matters that need to be grappled with in combination with the identification of the preferred strategy and allocation of sites.
- 2.8 Given the political statements contained within the plan re. housing numbers and the pending General Election, coupled with the changes to the Planning System suggested by the current government in respect of Plan Making, there may be fundamental changes in Government Policy that affect the Plan making process. Whilst we are sympathetic towards the Council and the constant changes in Government messages are difficult to address for Local Plans, the fact is that these issues will inevitably have a knock on effect on the ability to bring forward a Local Plan to adoption in 2025 and the LPA should factor this into its consideration of the time period of the plan and work in a buffer scenario in the event of an adoption post 2025.

Specific Comments**A. Paragraph 2.7**

- 2.9 We support Paragraph 2.7 and the recognition that housing delivery is more than just numbers and the right mix, choice and quality to meet the needs of the wider community are needed. SMEs are perfectly placed to meet these aspirations and therefore the more support the plan can give to SME's, the greater the opportunity that this objective can be met.

B. Paragraph 2.10

- 2.10 We note the reference to the HiF funding and the Council will need to seek the delivery of infrastructure in different ways. The SME Network would welcome continued engagement on this matter as the impact of viability is more acutely felt with SME developers. If there is an expectation that S106 contributions will be elevated to fund this infrastructure, the earlier this is known the better.

C. Vision of Medway - Paragraph 3.1

- 2.11 We support the broad visions as set out in paragraph 3.1 but note that reference to housing sits 6th on the list. Housing is the most critical part of the success of any Local Plan and includes a number of other objectives being met by it. Accordingly, we consider that housing delivery should be placed at the top of the visions as many other facets of the Local Plan flow from its delivery, including job provision, climate change, biodiversity net gain etc.

D. Strategic Objectives - Paragraph 4.2

- 2.12 We welcome the recognition that meeting high quality energy efficient homes has on people leading healthy lives. We consider this objective could be strengthened further by reference to good design. SMEs are well placed to deliver higher quality homes both in energy efficiency and good design and further reinforces that greater support for SMEs in the Local Plan can lead to the more effective delivery of other objectives.

E. Developing a Spatial Strategy – Paragraphs 5.3 to 5.5

- 2.13 Whilst we recognise the delivery of housing is an emotive topic and politically sensitive, we are unsure as to why the Local Plan sets out its position on the Standard Method in paragraph 5.3 and 5.4 in the way that it does. The paragraph appears to be a politicised statement questioning the validity of the Standard Method approach. The Standard Method is the current guidance and the starting point for assessing housing need. Reference is made that this method is ‘heavily criticised across the country’ albeit it does not substantiate by who or when and why.
- 2.14 It is noted that the Standard Method is a position in which other LPAs have successfully addressed in their emerging Local Plans. Medway is no different and should be ambitious in seeking to rise to the challenge of meeting its identified housing needs – rather than bemoan about the target itself.
- 2.15 We further note that the Local Plan has been brought forward by the new Labour administration in Medway. Notwithstanding the outcome of the General Election next year, it is noted that at the recent Labour Political Party Conference, the Labour leader Kier Starmer has reaffirmed Labour’s commitment to housebuilding and getting ‘Britain Building again’. This included confirmation of building 1.5 million more homes across the country within five years of a Labour Government. There is no suggestion at present that there is to be any downturn on the level of housebuilding expected to be delivered in the Country in the foreseeable future and therefore Medway should continue to plan under the Standard Method and be ambitious and embrace growth.
- 2.16 We note the Medway Growth Outcomes 2021-2037 demographic scenarios (Figure 1) but this also reflects the substantial under delivery of housing in Medway - which has been consistent now for a number of generations. This has had a negative impact on affordability ratios and stymied longer term growth in Medway. The Council should therefore be embracing the housing targets and seeking to understand how they can be used to good effect – such as delivering greater levels of employment, healthy communities and potentially assisting in meeting wider infrastructure objectives.
- 2.17 It is noted that infrastructure delivery is high on the agenda in Medway and is seeking to resolve existing issues, not just those that may be worsened by future development.

Accordingly, there is a case that the greater number of homes delivered will yield a greater capital receipt to fund and deliver these projects. Fewer homes results in fewer opportunities and will not resolve existing issues and could bring into questions the viability and deliverability of future infrastructure projects.

F. Paragraph 5.11

- 2.18 The Council should consider carefully the ability to meet Gravesham's housing need and fully understand why Gravesham cannot meet its own needs. Whilst cross boundary working is encouraged, Medway's housing target is substantial and ambitious in its own right. Therefore evidence needs to be demonstrated within the duty to cooperate why Gravesham cannot meet its own housing requirement and similarly what requests Medway has made of its neighbouring LPAs i.e. Gravesham, TMBC, Maidstone and Swale regarding helping meet their housing needs.

G. Paragraphs 5.12 to 5.15

- 2.19 We note the planned housing target of 29,000 dwellings from 2022-2040. As required by Paragraph 69 of the NPPF, 10% of the housing target should be made up of small sites on 1ha or less. This equates to a figure of 2,900 dwellings required to be identified on small sites.
- 2.20 This is a large target, but with collaborative working with the SME Network, the right sites and opportunities can be located. Crucially this means that in assessing sites in the LAA, that these sites are not 'screened out' at this stage and accordingly a qualitative exercise needs to be undertaken at this point in the Evidence Base analysis.
- 2.21 This is a critical issue and is the primary reason why the Network considers insufficient small sites are allocated in Local Plans. It is because the SA process and the LAA process, through a 'tick box' exercise of proximity of services and facilities, often renders smaller sites in 'less sustainable' (note not unsustainable) locations to be discounted at this early stage. From that point onwards it is extremely difficult to promote the site any further through the local plan.
- 2.22 We consider that the Council needs to take a proactive and pragmatic approach to how it is assessing small sites, recognising that a blended strategy is likely to be required and that allocating small amounts of growth in some of the more rural locations will actually result in

a benefit to that location, and not seen as unacceptable due to sustainability reasons. The reality is that in Medway, there are very few locations which are deemed wholly unsustainable to the extent that they cannot access day to day services within short trips - whether that be by public transport or the private car. The Council should therefore be open minded when it comes to small sites in rural areas – which are typically being promoted by SMEs.

- 2.23 Indeed we recommend that the Council's starting place in identifying sites to meet its housing need should start with the 2,900 dwellings being allocated on small sites, and then subsequent allocations on larger sites.

H. Potential Strategies

- 2.24 The Network does not offer comment on a preferred strategy due to the wider interests of the group. However, it is observed that no one strategy delivers a sufficient number of dwellings to meet the identified housing needs. Accordingly, it is disappointing that the Local Plan does not offer options of blended strategies to demonstrate how the housing needs could be met.
- 2.25 The Network observes that there are a number of brownfield opportunities within the Medway Urban Area. We also note that whilst many of these sites may fall under the 1ha threshold, this does not automatically render them an 'SME type' site. This could be because the site may be high rise residential (and thus unlikely to fit to a traditional SME model) or these sites come with substantial viability issues (either through decontamination, demolition or existing use values). Thus these brownfield sites pose a substantially greater risk than greenfield sites and places greater risk on that developer. The Local Plan should avoid identifying the 'most difficult sites to unlock' as SME sites as it is simply placing additional burden on SMEs to deliver at greater risk.
- 2.26 Accordingly we consider that a qualitative exercise is undertaken when assessing these sites to determine if they are being promoted by an established/genuine SME, and if not, the suitability and ability of an SME to bring forward any given brownfield site – given the physical and financial constraints present should be assessed.

- 2.27 Notwithstanding, whatever strategy is subsequently adopted by the Council, it should include the required minimum housing on small sites (2,900 dwellings) and fully support the delivery of SME sites through a specific small sites policy.
- 2.28 We also note the particular high reliance on windfall sites – 3,000 dwellings. Whilst this is supported in the context of flexibility for SME's, this windfall delivery can be enhanced by the introduction of a small sites policy, which allows for SMEs to come forward with good quality development. An example of the policy can be found in **Appendix 2** to this statement and previous discussions with the Council on this policy have been supported.
- 2.29 Any future plan should provide for a policy framework to allow SMEs to deliver throughout the lifetime of the plan, particularly in rural areas.
- 2.30 As part of the Network's objective, it has sought to introduce a policy into emerging Local Plans that seeks to support small and medium sized developments that builds on the 1ha site requirement but expands this into a policy framework that can allow SMEs to successfully operate within the policy framework of a Local Plan.
- 2.31 In this respect, the SME policy set out in Appendix 2 is a policy in which the Network considers would provide the opportunity for SME sites to come forward, whilst offering the LPA an enhanced development coming forward that is typically delivered by an SME – i.e. in respect of design quality or for instance carbon efficiencies.
- 2.32 Whilst the ideal scenario would be for the same policy to be adopted by each Council (and therefore apply a level of consistency in understanding and application of the policy), we also recognise that each LPA has a specific set of circumstances that may require the policy wording to be tweaked. This maybe the case in Medway and the Network would welcome further discussions as to how such a policy could be introduced into the Plan.
- 2.33 A Small Sites policy will allow for SMEs to operate within the Plan Led system and will allow both small and medium sites to come forward (i.e. sites above 1ha and up to 60 dwellings). Such a policy will allow an SME to come forward with a planning application that meets locally defined specific criteria, such as high-quality design, low carbon footprint, reduced time limits for implementation etc and a flexible approach to the delivery of Affordable Housing. On the other side of the coin, the Council will receive higher quality developments being submitted

that are in character with more rural fringe locations (remembering the SME site typology), but that those Rural Fringe locations can be supported with an appropriate amount of growth that will assist in preventing, slowing or reversing their cycle of decline.

- 2.34 Such a policy would provide for additional weight to be afforded to an SME application, and thus allow greater weight to be applied to the application in the overall planning balance. This would reduce risk to an SME and increase certainty at the planning stages, as the SME can tailor their scheme to meet the specific criteria.
- 2.35 Crucially, the policy is designed to deliver up to 60 dwellings (and thus meet the M of SME as much as the S) but is worded in a way that seeks to ensure the development coming forward in any given location is consistent and respectful to the area that it is in i.e. a scheme of 60 dwellings may not be appropriate for a small village, but 20 may be suitable, and therefore a policy that refers up to a figure of 60 dwellings is should be deemed acceptable and allows the policy to be flexible.
- 2.36 In addition, the 60 dwelling threshold is very much seen as the scale of developments where larger SME's start to compete with Volume housebuilders on sites. A volume housebuilder will tend not to drop below 60 dwellings and thus the Policy is designed to really assist SME delivery and support the delivery of bespoke high-quality development, but also directly respond to certain SME challenges, such as how to deliver small numbers of Affordable Housing on any given site.
- 2.37 The Network recognises that other Kent LPAs are seeking to introduce a Small Sites Policy and a key aim for the policy is that there is a level of consistency in the wording across a number of LPAs, in order that the interpretation and understanding of the policy is also consistent on a cross boundary level – again seeking to reduce the risk at the planning stages to an SME.
- 2.38 The importance of a planning consent is vital to the success of an SME, no matter how small (or large) that scheme is, and greater engagement is always encouraged. This works both ways and greater engagement can improve the submission material of an SME and thus also reducing risk.
- 2.39 A further burden on SMEs, and a point that the above policy is seeking to assist with is delivery of Affordable Housing. This is a wider matter than Medway, but it is well recognised that

Registered Providers are rarely interested in sites unless the number of affordable homes being offered equates to at least 20 affordable dwellings. The policy seeks a flexible approach to how Affordable Housing can be delivered by an SME in instances where it is the RP that is not interested, not that the SME does not wish to provide affordable home

- 2.40 Coupled with the small scale allocation (2,900 dwellings) and windfall allowance (3,000 dwellings), this amounts to up to 5,900 dwellings to be delivered on small scale and windfall sites. This is a substantial number and therefore should be set within a positive policy framework.

I. Paragraph 5.14

- 2.41 Paragraph 5.14 suggests the Council has undertaken a comprehensive and iterative review of potential sources of land at that the LAA will be published with this consultation document. The LAA that has been published is not analysis of sites but simply includes the data that was used to submit each site to the call for sites process. It is therefore lacking in any evidence and detail as to the suitability of these sites to support such a strategy. This includes the use of the Brownfield Register.
- 2.42 The critical element of actually meeting housing needs is not necessarily 'what' the overall number is, but 'how' it is anticipated to meet that number. It is noted that the Local Plan seeks to rely on a significantly high proportion of windfall development to meet its housing need.
- 2.43 We propose that sufficient specific allocations are made to meet the housing requirement and that windfall allowance is applied over and above the allocated sites (that meets the full housing need) to offer flexibility in the plan in the event some of the allocations are not delivered. This may also assist with the lifetime of the plan issue.
- 2.44 This option means that the minimum housing needs are likely to be met, as sufficient allocations have been made to meet this figure, with the flexibility being absorbed by the windfall development.



- 2.45 Such an approach would also provide for a more robust Housing Land Supply position as it would be less reliant on windfall sites coming forward and allow for more sites to go into the forward trajectory.

APPENDICES

APPENDIX 1

The Role of SMEs

THE ROLE OF SMEs

- 1.1 This statement set out the importance currently being placed by Central Government on the role of Small to Medium Enterprises (SMEs) in the housebuilding Industry and demonstrates the vital role SME Housebuilders will play in complementing volume housebuilders to deliver the Council's housing requirements and in turn the national housing target.

A. The Government's Position on SME'S

i) Building More Homes – July 2016

- 1.2 The Government has made it clear that it is committed to increase housebuilding to deliver 300,000 homes per year by the mid 2020's. The target figure of 300,000 homes per year comes from a recommendation in the House of Lords Economic Affairs Committee report, 'Building More Homes', published in July 2016¹. The figure takes into account estimated population change but also to address the backlog created by the failure to build enough homes over many years. All the main political parties have accepted the 300,000 dwelling per annum figure.
- 1.3 Statistics monitoring completions across the UK (gov.uk) confirm Housebuilding has not achieved this level of growth since 1977-78 (314,090 dwellings – Live_Table 109) and in 2017-18² only 222,194 dwellings (Live_Table 122) were completed. Whilst this is an increase since 2012-13 (124,722 completed dwellings), this is still well short of the 300,000 dwelling target.

ii) Home Builders Federation – January 2017

- 1.4 In January 2017, the Home Builders Federation prepared a research paper titled 'Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes'³. This document highlighted a number of facts, inter alia:
- In 1988, small builders were responsible for 4 in 10 new build homes (40%). Today it is just 12%.
 - In 1988, 12,000 SMEs were building houses. In 2017, this figure was only 2,500 SMEs.

¹ <https://publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

² 2018-19 data is not yet complete.

³ https://www.hbf.co.uk/documents/6879/HBF_SME_Report_2017_Web.pdf

- The average permissioned housing scheme has increase in size by 17% since 2007, suggesting many allocated sites are out of reach for smaller companies.
- Small sites are consistently efficient in their delivery.
- Delay and risk during the planning stage has influenced lender attitudes to housebuilding meaning terms SMEs borrow on are restricting growth opportunities.
- In 2007-2009, 33% of small companies ceased building homes.
- Returning to 2007 home builder levels could see housing supply boosted by 25,000 dwellings per year.

1.5 The HBF report attributes the reasons for the decline in SMEs has been for two principal reasons:

1. A long-term trend following landmark planning legislation in 1990 which tipped the balance of control significantly further away from entrepreneurial home builders to LPAs; and,
2. The above long-term trend compounded by the Global Financial crisis in the late 2000s when the availability of development finance became a concern.

1.6 The report continues that *'the above effects are further compounded by the availability of suitable housing sites and the constant struggle of securing an implementable planning consent through the planning process beset by delays and bureaucracy. These delays and associated costs have tangible impacts on SMEs and their ability to grow. Whilst larger companies can mitigate risk across a number of sites, small firms encountering delays on one or two sites will be the difference between a year of growth and a year of contraction'*.

iii) White Paper – February 2017

1.7 The release of the Government's White Paper in February 2017 titled 'Fixing our Broken Housing Market'⁴ only reinforced the concerns about the lack of SMEs building Houses. The Report identified 3 main problems and described the housing market as 'broken', blaming the supply shortage, *"for too long, we haven't built enough homes"*. The three problems were identified as:

1. Not enough local authorities planning for the homes they need;
2. House building is simply too slow; and,

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

3. The construction industry is too reliant on a small number of big players. (our emphasis)

- 1.8 The white paper outlined the Government's plans to change ('fix') the market. It called for *'a new approach to house building that included: building homes based on need; building homes faster; diversifying the house building market; and by making it more affordable for people to buy homes.'* (our emphasis)
- 1.9 The White Paper was clear that the Government intends to open the housing market to smaller builders and those who embrace innovative and efficient methods.

iv) House of Lords Debate – January 2018

- 1.10 On 11 January 2018, the House of Lords debated 'Housebuilding in the UK'⁵ and noted the performance of the UK's major house builders. The debate acknowledged the 2017 HBF report and focussed on the HBF suggestion that part of the practice of local authorities focusing on larger sites with a very high number of units may be counterproductive. The debate acknowledged *'that while it may be efficient in strong market areas, it is inefficient in weaker market areas. While the NPPF has been lauded for increasing the number of planning consents, it is argued that the number of sites permissioned, in areas of need, remains short of where it needs to be.'*

v) Revised NPPF – July 2018

- 1.11 The manifestation of the above discussions set about the introduction of a new approach within the revised NPPF 2018⁶, which sought to encourage the use of smaller sites and the requirement that 10% of the housing requirement on sites no larger than 1ha should be identified. The 10% target and 1ha was amended from the consultation version suggestion 10% of 'allocations' and only 0.5ha sites. The increase acknowledged the greater variety of sites SMEs are attracted to.

vi) Letwin Independent Review of Housing Build Out Rates – October 2018

⁵ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/LLN-2018-0001#fullreport>

⁶

<https://webarchive.nationalarchives.gov.uk/20181206183454/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 1.12 In October 2018, Sir Oliver Letwin issued his final ‘Independent Review of Build Out’⁷ report and recommendations on how to close the significant gap between the number of housing completions and the amount of land allocated or permissioned on large sites in areas of high housing demand.
- 1.13 Whilst the main body of the report focussed on the perceived issue of land banking, Sir Oliver Letwin identified that the *‘build out rate’ on small sites is intrinsically likely to be quicker than on large sites; (to take the limiting case, a site with just one house will take only as long as required to build one unit).’*

vii) Homes England Strategic Plan 2018-2023 – October 2018

- 1.14 In October 2018, Homes England released its 5-yr ‘*Strategic Plan 2018-2023*’⁸ plan to detail how it will improve housing affordability, helping more people access better homes in areas where they are needed most. The plan outlines their ambitious new mission and the steps that they will take, in partnership with all parts of the housing industry sector, to respond to the long-term housing challenges facing the country.
- 1.15 The Strategic Plan goes to some lengths identifying the decline in SME housebuilders and the result being the house building market is increasingly made up of a small number of house builders, meaning there is insufficient diversity, competition and capacity. The report continues:

There are a number of barriers preventing smaller builders from delivering a greater number of homes including: a lack of development finance; a land market weighted in favour of larger builders; and a complex planning system.

This is why we’ll create a more resilient and competitive market by supporting smaller builders and new entrants. In addition, Homes England will work with house builders to promote better design and higher quality homes.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf

⁸ <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223>

- 1.16 Driving Market Resilience has therefore been identified as a key priority for homes England. This includes access to finance but crucially where HE own sites which are too large to be developed by smaller builders, they will look for opportunities to create smaller parcels which better suit their capacity. They will achieve this improving opportunities for smaller builders to access land, and introduce simpler tender and legal documents on smaller sites to make the bidding process easier.
- 1.17 Furthermore, the strategic report looks beyond the immediate 5-yr plan and identifies a longer term priority to explore opportunities for, inter alia, removing the planning burdens faced by smaller builders on more complex sites.

viii) House of Commons Briefing Paper – December 2018

- 1.18 On 12 December 2018, a House of Commons Briefing Paper titled '*Tackling the Under-Supply of Housing in England*'⁹ was released. The report addressed all facets of factors influencing the delivery of new homes and addressed in detail 'Support for SME Developers'.
- 1.19 The Briefing paper recognised the barriers to delivery and the impact that competition for land has on SMEs. The report states that '*While there is sufficient land to build on, land is scarce in economic terms as its supply is inherently limited and fixed. This leads, it is argued, to developers having to undergo 'fierce' competition for land "while remaining uncertain as to what planning permission they will be able to secure."* The price of land is certainly viewed as a barrier to housebuilding. The gain in value that planning permission offers is said to encourage strategic land trading, rather than development, resulting in the most profitable beneficiaries of residential development being the landowner, not the developer. High land prices can, in turn, force down the quality and size of new homes and present difficulties for small and medium sized enterprises (SMEs) when seeking to compete for sites to develop.' (our emphasis)
- 1.20 The Briefing Paper further acknowledged the over reliance on a small number of developers and considered that '*This concentration of market power is felt to inhibit competition and can exacerbate the impact of market shocks when all the large firms simultaneously reduce output*'.
- 1.21 The briefing paper recognised that housebuilding requires considerable up-front investment, meaning that '*in most cases, new housing developers need access to finance. For the housebuilding industry, a particular concern is access to finance for SME developers.*

⁹ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7671#fullreport>

The Aldermore Group, a bank specialising in finance to small businesses, have stated: ...smaller developers continue to struggle with access to finance, with a recent industry survey showing that more than 50,000 construction and real estate firms have begun the year in 'significant' financial distress...unless more is done by lenders to increase funding to smaller regional developers, the potential for the industry to reach... [the Government's house building target]...will be less likely.'

- 1.22 Problems accessing finance can have an impact on house builders' ability to produce high quality housing, as well as on the overall capacity of the house building industry. As far back as the Budget 2014 a commitment was made to support SME access to finance with the government creating a £500 million Builders Finance Fund to provide loans to developers to unlock 15,000 housing units stalled due to difficulty in accessing finance. In July 2015, the then Housing Minister announced that the Fund would be extended. The Spending Review and Autumn Statement 2015 further extended the £1 billion Fund to 2020/22. In October 2016 the launch of a £3 billion Home Building Fund under which builders, including SME builders, can obtain loan finance to assist with development costs and infrastructure work was established.
- 1.23 The Autumn Budget 2017 announced a further £1.5 billion for this Fund "providing loans specifically targeted at supporting SMEs who cannot access the finance they need to build. The 2017 Budget also said: "The government will explore options with industry to create £8 billion worth of new guarantees to support housebuilding, including SMEs and purpose built rented housing.
- 1.24 The briefing continues that SME developers are less able to withstand market shocks. This is illustrated by the fact that their share of total housing starts declined after each of the last two house price crashes (as quantified in the 2017 HBF report). A factor that would reduce risk and improve confidence in the development process is house price stability.

ix) Revised NPPF - February 2019

- 1.25 In February 2019, the latest version of the NPPF¹⁰ was released. This continues the March 2018 version in respect of the desire to encourage smaller sites to come forward in the planned system. Paragraph 68 of the NPPF 2019 states:

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
 - b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
 - c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
 - d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

- 1.26 The NPPF makes it clear that that small and medium sized sites can make an important contribution to meeting housing requirements in an area. To this end and to encourage small and medium sites, para 68 (a) seeks that 10% of small sites no larger than 1ha should be identified.
- 1.27 MBC needs to respond to this guidance in a proactive way. As detailed above, due to the competition for SMEs to enter the market it is likely that sites being promoted by SMEs will fall into Rural Service Centres or smaller villages away from the main urban areas or areas perceived as having the greatest accessibility. In this respect, paragraphs 77 and 78 (Rural Housing) of the NPPF complement paragraph 68 insofar that they recognise that planning policies need to be responsive to local circumstances and support housing development that reflects local needs. Para 77 continues that to support opportunities for affordable housing, some market housing should be considered to facilitate this. Para 78 further supports that housing should be located where it will enhance or maintain the vitality of rural communities. Policies should identify opportunities for villages to grow and thrive.
- 1.28 Small and Medium sized sites can make a valuable contribution to these locations principally because the approach of SMEs is more flexible than a volume housebuilder and therefore can at a scale and quality that reflect the characteristics of village locations.

x) Speech by Minister of State for Housing, Esther McVey – September 2019

- 1.29 Most recently, in September 2019, the Minister of State for Housing, Esther McVey gave a speech¹¹ at the convention for the residential property sector. Alongside reaffirming the commitment to 300,000 homes per annum, reference was made to improving the quality of housing and posed the following point *'and what about the jobs and the careers to build all these homes, we need to think about that. We need to be opening up this house building to SME's, bringing them onboard, bringing it to communities, bringing it to the self-build and bringing in modern methods of construction.'*

B. Pace of Delivery of an SME

- 1.30 SME's help diversify the market and deliver choice and quality, but they can also deliver at a quicker pace than larger sites. This means that by supporting SME's into the Maidstone market, MBC can strengthen its Housing Delivery and ensure a steady supply of deliverable sites.
- 1.31 Typically, Esquire Developments aim to take no more than 6 months from receipt of detailed consent to start on site.
- 1.32 The SME business model is usually set up differently to volume housebuilders. SME's are more flexible in matters such as design and landowner negotiations. In addition, SME's also try to limit their financial risk/exposure. As a result, there are a number of factors that that affect an SME's approach to delivering a site. This includes:

1. Cash Flow

- SMEs tend not to land bank as a return on their financial exposure/risk is critical to maintaining a profitable business. In this respect Cash Flow is critical and due to the time lag involved in the return of funds from a development (i.e. once homes begin to be sold), it is essential SMEs seek to reduce the time taken from the point of receiving a planning permission to the point of the sale of a house. This means once an implementable planning consent is secured, SMEs commence as quickly as possible to start on site. Larger PLCs can better carry this risk through multiple sites and numerous pipeline of completions - whereas SME's will have fewer outlets and therefore less regular returns in this respect.

¹¹ <https://www.gov.uk/government/speeches/resi-convention-2019>

2. Infrastructure Requirements

- Infrastructure requirements on small to medium sized sites are less onerous. This means discussions/contracts with utility providers are less complicated and time taken to implement the required infrastructure is less allowing this element of the build to be quicker.

3. Land Negotiations

- Often small and medium sized sites have fewer legal complications. This includes fewer land registry titles and fewer landowners and as a result fewer negotiations/legal complications that larger sites or larger PLC companies require. This often makes the 'land deal' more straightforward and thus quicker.

4. Flexibility in Product and Process

- Due to an SME's flexible approach to design quality and that standard house types tend not to be adopted, SME's have the ability to be more flexible when it comes to product choices. This not only allows the SME to offer a variety of product or specifically address local characteristics/design requirements, but it also means the SME can respond quickly to any delays or changes to the supply. This is mainly due to the decision makers being involved in the process and being 'hands-on'. As a result, there is a less hierarchal structure and decisions can be made quickly and efficiently – again reducing time.

5. Working relationships

- SMEs tend to work with a close number of trusted consultants and suppliers who also tend to be SMEs. This not only ensures quality of service and product but allows for open communication when it comes to availability of supplies and delivery of products. This means any potential delays are anticipated and the ability to successfully work through solutions. In addition, the sale of the dwellings tends to be on a more bespoke basis meaning the dialogue and communication between SME and Buyer is also on an open and communicative basis.

6. Sales Rates

- Once construction has commenced, completion rates, which follows sales rates matches the market demand and therefore an SME can build out at the same pace as larger volume housebuilders who adopt the same approach.

- 1.33 Whilst there is little literature addressing the delivery of small sites, there is a significant amount relating to the delivery of large-scale sites. Nathaniel Litchfield & Partners (NLP) produced a research paper titled ‘Start to Finish – How quickly do large-scale housing sites deliver? (November 2016)’¹². The report recognised that *‘Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period..... But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes’*.
- 1.34 The report continues that *‘past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result’*. NLP suggest that if authorities’ Local Plans and five-year land assessments are placing reliance on large-scale developments, including Garden Towns and Villages, to meet housing need, then *“the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.”*

xi) Revised NPPF – July 2021

- 1.35 The NPPF was revised in July 2021¹³ to accommodate a number of changes. This included a change in emphasis to good design and how good design was fundamental to what the planning and development process should achieve. Furthermore more, it confirmed development that is not well designed, should be refused and conversely, significant weight should be given to developments which reflect local design policies and/or promote high levels of sustainability or help raise the standard of design more generally in an area. SME’s as well placed in this regard to meet these challenges successfully.
- 1.36 The updated NPPF also amended the numbering of paragraph 68 to paragraph 69, but made no text changes to the 2019 version.

xii) The Bacon Review (August 2021)

¹² <https://lichfields.uk/media/1728/start-to-finish.pdf>

¹³ <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

- 1.37 In August 2021, the Prime Ministers Independent Review into scaling up self build and custom housebuilding was published¹⁴. Led by Richard Bacon MP. Whilst primarily dealing with recommendations to government on how to support growth in all parts of the custom and self build market, helping to boost capacity and overall housing supply in our housing market, the review touched on the plight of smaller building firms.
- 1.38 The report outlined how smaller firms now account for only 12% of new housing stock and *'have been largely squeezed out by very big companies who can afford the time and cost involved in negotiating a path through the complex thickets of the planning system'*.
- 1.39 The review continues that *the SME sector has nearly been destroyed as a direct consequence of a regulatory environment which is both exceptionally complex and fraught with risk, so that the gaining of planning consents requires both very deep pockets and the ability to bear significant risks over very long periods of time.*

xiii) Meeting Housing Demand, House of Lords Select Committee (January 2022)

- 1.40 In January 2022, the House of Lords Select Committee released its report 'Meeting Housing Demand'¹⁵. A series of recommendations to Government about addressing housing demand. This included recommendations on the planning system as well as the role of SMEs (Chapter 4). The report confirmed:

'In this report, we call on the Government to take action and remove the administrative and other blockers which, at present, make increasing the number of homes built much more difficult. We recognise that these challenges play out differently across the country as a whole. London and the South East face different challenges to other regions, as do those at different ends of the affordability scale.'

Small and Medium-sized Enterprises (SMEs)

The role of SMEs in the housebuilding industry has collapsed: in 1988, SME housebuilders built 39% of new homes; now they build just 10%. If housing demand is to be met, SMEs should be supported through reduced planning risk, making more small sites available, and increased access to finance. We also

¹⁴ <https://www.gov.uk/government/publications/independent-review-into-scaling-up-self-build-and-custom-housebuilding-report>

¹⁵ <https://committees.parliament.uk/work/1328/meeting-the-uks-housing-demand/publications/reports-responses/>

provide options for a fast-track planning process for SMEs to reduce delays and planning risk.

1.41 In terms of summary of conditions, in respect of SME's the report made the following:

SMEs

12. The role of SMEs in the housebuilding industry has seen a sharp decline: in 1988, SME housebuilders built 39% of new homes, by 2020 this had dropped to 10%. The Government should encourage SME housebuilders in order to diversify the market and maintain competition. (Paragraph 103)

13. Local authorities should support SME housebuilders to navigate the planning process. One focus of the Government's planning reforms should be to reduce planning risk by making decisions more predictable and reducing delays, which will benefit SMEs. The Government should work with local planning authorities to create a fast-track planning process for SMEs. (Paragraph 104)

14. Wider adoption of the 'master developer' model, where larger sites are built out by a number of different housebuilders, would help SME housebuilders bid for more secure developments. The Government should require local planning authorities and Homes England to increase the percentage of homes on larger sites each year which are built by SME housebuilders. (Paragraph 108)

15. Access to finance is one of the key barriers for SME housebuilders. The Government should work with lenders to encourage them to provide more support to SME housebuilders on commercial terms. (Paragraph 112)

1.42 In March 2022, the Government published its response to the report¹⁶. In response to matters relating to SME's, the Government responded in the following ways:

'We agree with the Committee that there remain some specific barriers to increasing housing supply. To alleviate these, we are continuing to drive up the supply of good quality new homes that people need and want, including by diversifying the market and supporting SMEs through the Government's Levelling Up Home Building Fund'

The Government wants to increase competition in the housebuilding market, supporting SME housebuilders to deliver the choice of housing consumers need

¹⁶ <https://committees.parliament.uk/publications/9234/documents/159940/default/>

and want in this country. We agree with the Committee's report that SMEs have a vital role in making the housing market more diverse, competitive and resilient, and we are committed to ensuring the right support is in place. SMEs have a vital role in training and retaining their workforce, including delivering apprenticeships.

As stated in the Committee's report (p. 43), Government is aware that historically the three main barriers SMEs identify as facing are planning, land and finance. We have put in place a package of measures, including financial initiatives to help SMEs grow and develop, such as the Home Building Fund and the ENABLE Build Guarantee scheme. The Home Building Fund will see up to £3 billion of funding or short-term development loans provided to SMEs, custom builders and developers using modern methods of construction. It has supported many new sector entrants, with two thirds of the SMEs who have utilised funding existing for less than three years. We have committed 91% of the initial £2.5 billion development finance allocated to the Home Building Fund, and 94% of contracted transactions are with SMEs, two-thirds of which had existed for less than three years when accessing the fund. Home Building Fund development finance is now expected to support close to 70,000 homes once fully committed.

Funding has contributed to interventions like the Housing Accelerator Fund, a lending alliance between Homes England and United Trust Bank which provides SMEs with development finance at up to 70% Loan to Gross Development Value, and the Housing Delivery Fund, set up with Barclays, which provides £1 billion of loan finance to help support small and medium sized developers, speeding up the delivery of thousands of new homes across England.

To build on the success of the Home Building Fund, we have now launched a £1.5 billion Levelling Up Home Building Fund. This will provide loans to small and medium sized builders and developers to deliver 42,000 homes, with the vast majority going outside London and the South East.

We welcome the Committee's suggestions on planning and land. The Government is considering how to best take forward proposals around changes to the planning system, including how they align with and support our wider

mission to level-up the country and regenerate left-behind places. Within this, we are exploring further options to support prompt and faster build-out of sites as part of our proposed changes. These changes will support diversification by providing small builders with more speed and certainty in the planning process.

xiv) Levelling Up and Regeneration Bill: Reforms to National Planning Policy (Dec 2022) Consultation

- 1.43 In December 2022, the Government consulted on the ‘Levelling-up and Regeneration Bill: reforms to national planning policy’¹⁷. This proposed a suite of amendments to the NPPF. Specifically, in relation to SME’S, the consultation made the following statement:

More small sites for small builders

10. Small sites play an important role in delivering gentle density in urban areas, creating much needed affordable housing, and supporting small and medium size (SME) builders. Paragraph 69 of the existing National Planning Policy Framework sets out that local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. The Framework also asks local planning authorities to use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward; and to support the development of windfall sites through their policies and decisions. Local planning authorities are asked to work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

11. We have heard views that these existing policies are not effective enough in supporting the government’s housing objectives, and that they should be strengthened to support development on small sites, especially those that will deliver high levels of affordable housing. The government is therefore inviting comments on whether paragraph 69 of the existing Framework could be strengthened to encourage greater use of small sites, particularly in urban

¹⁷ <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy#chapter-4--planning-for-housing>

areas, to speed up the delivery of housing (including affordable housing), give greater confidence and certainty to SME builders and diversify the house building market. We are seeking initial views, ahead of consultation as part of a fuller review of national planning policy next year. Alongside this, the government has developed a package of existing support available for SME builders, including the Levelling Up Home Building Fund which provides development finance and Homes England's Dynamic Purchasing System which disposes of parcels of land.

- 1.44 Two important questions were asked as part of the consultation:

Q.24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

Q.25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

- 1.45 The outcome of the Consultation is pending and further review of the planning system to support SMEs is expected.

C. Conclusion

- 1.46 The role of SMEs has been fully recognised by Central Government (both in the house of Commons and House of Lords) and the wider Industry (HBF, NLP) in how important their role is to helping deliver the 300,000 homes per annum target. Constraints to SMEs have been identified, including that the plan-led system is orientated away from encouraging SMEs into the market and access to finance.
- 1.47 The 2019 NPPF has provision within it to specifically address this issue with a clear direction to Local Planning Authorities that 10% of all its housing requirements should be on sites that are 1ha or less i.e. approx. 35 dwellings and under per site. This is aimed at SME developers who deliver at or around this scale.
- 1.48 Most recently the Governments response to the House of Lords report 2022 confirms their commitment to supporting SMEs and recognising their role in meeting housing demand. The

most recent consultation to the NPPF in 2022 however acknowledged that the NPPF as drafted is not having the desired effect for SMEs and that this specific matter will be addressed in due course.

The Kent SME Developers Network

March 2023

APPENDIX 2
Small Sites Policy

SMALL SITES POLICY

Preamble:

Small sites and SME housebuilders play a significant role in housing delivery and have been described by Government as having National Importance. SMEs are more intrinsically linked with the local supply chain and are more likely to invest in local materials and construction, offer apprenticeships and utilise wider Kent based partners from concept through to sale.

SMEs are more adaptive to change and can bring forward bespoke developments quickly. SMEs are less susceptible to long term delays and do not land bank. Land ownership and infrastructure constraints are often far less challenging than on strategic scale developments aiding early delivery.

However, SMEs do not hold large land portfolios and tend to not invest in land over long periods of time. Land is rarely promoted through the Local Plan process as a result. Furthermore, land opportunities tend to be immediate opportunities, often as windfall sites or previously developed land. There are also limited land opportunities for SMEs who often find sites are located in rural fringe locations, meaning Sustainability factors vary from site to site creating uncertainty. In addition, small sites often only provide for small amounts of Affordable Housing which is unattractive to Registered Providers and can make schemes unviable or again, uncertain.

Accordingly, [insert LPA] will pro-actively support well designed new homes on small sites through both planning decisions and plan-making in order to:

1. Increase the contribution and speed of delivery of small scale housing sites to meet [insert LPA] housing needs;
2. Support and increase SME Housebuilders and associated local businesses delivering in [insert LPA];
3. Diversify the locations, type and mix of housing being delivered in [insert LPA].
4. Increase Design Quality

In order to increase certainty on small sites [insert LPA] will:

- 1 Identify and allocate appropriate small sites for residential development for phasing early within the plan period;
- 2 Publish an up to date rolling Brownfield Register, including a Part 2 list of sites whereby a permission in principle will be established;
- 3 Utilise local development orders and encourage neighbourhood development orders to bring forward suitable sites;
- 4 Take a flexible approach to delivery of Affordable Housing on a site by site basis utilising the opportunity to provide increased provision of First Homes or payment in-lieu of on site provision where site specific circumstances justify;
- 5 Provide opportunities for custom-build housing and community-led housing projects on suitable sites.
- 6 Prepare an SME Protocol process to allow for positive and productive discussions at the pre-application stage, with a clear expectation of material to be submitted and timescales. To ensure sufficient officer resource including an SME related PPA fee.

Small housing developments should be carefully and creatively designed to protect the amenity of surrounding properties in relation to privacy, for example through the placement and design of

windows and the use of landscaping. Environmental and architectural innovation should be supported and schemes should achieve good design.

A 60 unit threshold set out in Policy [insert Policy Number] Small sites is considered to be representative of the general threshold at which an SME may obtain and the point at which sites become too small for larger regional or volume Housebuilders. It is considered this scale of development will capture more SME type sites and facilitate support to the SME market. For this reason the small site policy differs from that used in Planning Practice Guidance and the definition of 'major development' in planning legislation.

Policy [insert Policy Number] Small Sites

In order to recognise the value of SMEs and small scale sites, the Council will support development of unallocated or windfall small scale housing (C3) and approve applications providing the harm does not demonstrably outweigh the benefits; and where:

- I. The site does not exceed 60 dwellings (net) and is of an appropriate scale to its location;
- II. The site is being brought forward by a recognised SME Developer and is not part of a larger site;
- III. The proposed development delivers;
 - a. A bespoke design approach;
 - b. A high quality design that is locally distinctive;
 - c. Is sympathetic to the character of its location;
- IV. All dwellings meet National Design Standards and endeavor to deliver a range of Carbon reduction build techniques;
- V. The proposed development preserves residential amenity, designated heritage assets and core environmental assets and increase net biodiversity.
- VI. A flexible approach will be encouraged to the delivery of Affordable Housing assessed on a site by site basis. Where on site provision is demonstrated through evidence to be unviable or unattractive (less than 70% Open Market Value) to recognised Registered Providers, the Council will permit alternative levels of Affordable Housing or alternative forms of tenure, including First Homes, payment in-lieu of on site provision or another form of recognised Affordable Product as defined in the NPPF.

It is recognised that SMEs can deliver quickly and applicants are encouraged to explore if a reduced implementation period is appropriate.

APPENDIX 3

Assessment of Medway Housing Allocations

Strategic Site Ref	Address	Site use	Site Area	Available	Yield	Delivered before 2025	Planning submitted	Existing Employment	Retail
AS21	Land to the south of The Brimp, (west of Avery Way and north of Ratcliffe Hwy), Allhallows-on-Sea, Medway, Kent, ME3 9QB	Residential led (Mixed-use)	41.62	Yes	390	No	No	No	No
AS22	Land East of Stoke Road and North and South of Binney Lane, Allhallows, ME3 9PF	Residential led (Mixed-use)	32.68	Yes	300	No	No	No	No
AS24	National Grid, Isle Of Grain Storage Installation and wider Grain Business Park site, Isle of Grain, Rochester, ME3 0AB	Non-residential	158.6	Yes	0	No	Yes	Yes	No
AS26	Grain CHP Power Station, Grain, ME3 0AR	Non-residential	85.25	Yes	0	No	No	No	No
HHH12	W St. J Brice Ltd, Church Farm, Main Road, Hoo, Rochester, ME3 9LL	Residential led (Mixed-use)	131.27	Yes	1850	No	No	No	No
HHH22	Land west of Ropers Lane, Hoo St Werburgh, Medway, Kent, ME3 9LT	Residential led (Mixed-use)	72.77	Yes	1500	No	No	No	No
HHH26	Land to the East of High Halstow, Land South of Britannia Road	Residential led (Mixed-use)	39.81	Yes	760	No	Yes	No	No
HHH3	Lodge Hill, Chattenden, Rochester	Residential led	23.83	Yes	500	No	No	No	No
HHH35	Kingsnorth, east of Ropers Lane, Hoo St Werburgh, Kent, ME3 9LT	Non-residential	76	Yes	0	No	No	No	No
HHH36	Eschol Road, Hoo St Werburgh, Rochester, ME3 9NQ	Non-residential	114.11	Yes	0	No	Yes	Yes	No
HHH6	Land off Chattenden Lane, Chattenden, Rochester	Residential led (Mixed-use)	35.32	Yes	550	No	No	No	No
LW6	Land West of Sharstead Farm and East of North Dane Way	Residential led	46.8	Yes	800	No	Yes	No	No
LW8	Land off Capstone road and Shawstead Road, Chatham Kent	Residential led	87.79	Yes	2075	No	No	No	No
RSE10	Land to the east of Otterham Quay Lane and Mierscourt Road, Rainham	Residential led (Mixed-use)	41.58	Yes	850	no	No	No	No
SMI6	South Side Three Road/North Side Three Road, Chatham, Kent, ME4 4SW	Residential led (Mixed-use)	57.71	Yes	3000	No	No	Yes	No
AS10	The White Horse, The Street, Upper Stoke, Rochester (ME3 9RT)	Residential led	0.18	Yes	5	Yes	Yes	No	No
AS11	Land at the Street, Rochester, ME3 9RT	Residential led (Mixed-use)	0.17	Yes	10	No	No	No	No
AS14	Land to the north of the A228, Lower Stoke	Residential led	2.72	Yes	90	No	No	No	No
AS15	Land at Middle Stoke, Grain Road, Rochester Me3 9RS	Residential led	0.86	Yes	15	No	Yes	No	No
AS16	Mackays Court Farm, Lower Stoke, Rochester, ME3 9RJ	Residential led (Mixed-use)	0.47	Yes	25	No	No	No	No
AS17	Land to the east of the A228, Grain Road, Lower Stoke, Rochester	Residential led	7.83	Yes	180	No	No	No	No
AS18	Baytree Farm, Stoke Road, Allhallows, Rochester, ME3 9PG	Residential led	1.69	Yes	48	No	No	No	No
AS2	Fenn Farm, Fenn Street, St. Mary Hoo, Rochester, ME3 8QS	Residential led	0.34	Yes	4	No	No	No	No
AS23	The Reeds, Avery Way, Allhallows, Rochester, Kent, ME3 9QJ	Residential led (park homes)	2.84	Yes	0	Yes	Yes	No	No
AS25	Land at Grain Road Grain Isle of Grain	Residential led	1.29	Yes	25	No	Yes	No	No
AS28	Medtha Bungalow, Victoria Fort Road, Isle of Grain, ME3 0DX	Residential led	1.21	Yes	25	No	No	No	No
AS29	Burneys Farm and Nord Farm, Stoke and Allhallows, ME3 9SL	Residential led	0.23	Yes	7	No	No	No	No
AS6	Fenn Bell Zoo Overflow Carpark, Land off Fenn Street, Upper Stoke, Rochester, ME9 9SG	Residential led (Mixed-use)	2.35	Yes	40	No	No	No	No
CCB1	Unit 3, New Cut, Chatham, ME4 6AD	Residential led	0.23	Yes	35	No	No	No	No
CCB10	Chatham High Street & Best Street 2010 - carpark ME4 4RH	Residential led (Mixed-use)	0.39	No	72	No	No	No	No
CCB11	Chatham High Street & Best Street 2010	Residential led	0.15	No	30	No	No	Yes	No
CCB12	Land at 9 Clover Street, Chatham, ME4 4DT	Residential led (Mixed-use)	0.18	Yes	24	No	No	No	No
CCB13	MC/18/1383, Chatham 2019, Chatham High St & Best St 2010, Pentagon 2005	Residential led (Mixed-use)	1.85	No	212	Withdrawn	No	No	Yes
CCB15	220-240 High Street, Chatham, ME4 4AN	Residential led (Mixed-use)	0.34	Yes	90	No	No	Yes	No
CCB16	Chatham 2019, Chatham Centre & Waterfront 2008 - Crown House, 55-59 The Brook, Chatham (ME4 4LQ)	Residential led	0.21	No	26	No	No	Yes	No
CCB17	MC/18/1383, Chatham 2019, Chatham High St & Best St 2010, Pentagon 2005 - Pentagon Centre, Chatham, ME4 4AJ	Residential led (Mixed-use)	0.08	Yes	14	Withdrawn	No	No	Yes
CCB18	Chatham 2019, Chatham Centre & Waterfront 2008 - Crown House, 55-59 The Brook, Chatham (ME4 4LQ) - King Street, Chatham 105A, The Brook, Chatham, ME4 4YT	Residential led	0.06	No	193	No	No	No	No
CCB19	Abbey Auction Rooms, 1-3, Rhode Street, Chatham, ME4 4AL	Residential led (Mixed-use)	0.04	Yes	13	Maybe	Yes	No	Yes
CCB20	land and buildings on the north side of Whittaker Street, Chatham, ME4 4AL	Residential led (Mixed-use)	0.5	No	175	No	Yes	No	Yes
CCB21	263, 265, 267 and 269 High Street, Chatham (ME4 4BZ)	Residential led (Mixed-use)	0.04	Yes	14	No	Yes	No	Yes
CCB22	Pentagon Service Station, The Brook, Chatham, ME4 4LU - and other titles	Residential led	0.11	No	14	No	Yes	No	No
CCB23	20 Batchelor Street, Chatham (ME4 4B))	Residential led (Mixed-use)	0.02	No	5	Yes	Yes	No	No
CCB24	MC615, MC/21/0603, Chatham 2019, Chatham High St & Best St 2010 - Land to the north of High Street, Chatham, Medway, ME4 4BN	Residential led (Mixed-use)	0.02	Yes	9	Yes	Yes	No	yes

Key
Non-Residential
Suitable Allocations
Discounted Sites

CCB25	Chatham Interface Land 2018	Non-residential	2.64	Yes	0	No	No	No	No
CCB26	Chatham 2019, Chatham High St & Best St 2010 - 100 The Brook, Chatham (ME4 4LB)	Residential led (Mixed-use)	0.43	No	49	No	No	No	Yes
CCB27	Ghengis Fireworks, 100 The Brook, Chatham, ME4 4LB - 100 The Brook, Chatham (ME4 4LB)	Residential led (Mixed-use)	0.06	Yes	30	No	No	No	Yes
CCB28	Chatham High St & Best St 2010-land on the east side of Church Street, Chatham, ME4 4BT	Residential led	0.09	No	11	No	No	No	No
CCB3	MC/20/2905 - 1 Cambridge Terrace, Chatham (ME4 4RG)	Residential led (Mixed-use)	0.03	Yes	13	Maybe	Yes	Yes	No
CCB30	MC/18/1585, MC/16/4304, Chatham 2019, Chatham High St & Best St 2010 - MC/20/2782, Chatham 2019, Chatham Centre & Waterfront 2008 - the south west side of Cross Street, Chatham, ME4 4BJ	Residential led (Mixed-use)	0.08	Yes	21	Maybe	Yes	No	No
CCB31	MC/20/2782, Chatham 2019, Chatham Centre & Waterfront 2008 - the south west side of Cross Street, Chatham, ME4 4BJ	Residential led	0.8	Yes	179	No	Yes	No	No
CCB33	MC/19/0752	Residential led	0.02	No	6	No	No	No	No
CCB34	324-326 High Street, Chatham (ME4 4NR)	Residential led (Mixed-use)	0.51	No	36	No	No	No	Yes
CCB35	Chatham Interface Land 2018	Non-residential	2.7	Yes	0	No	No	No	No
CCB36	MC/16/4568 - 330 High Street, Chatham (ME4 4NR)	Residential led (Mixed-use)	0.03	No	7	No	No	No	Yes
CCB37	Former GoOutdoors and Market Hall, High Street, Chatham	Residential led (Mixed-use)	1.31	Yes	400	No	No	No	Yes
CCB38	MC/22/0491 - 346a High Street, Chatham (ME4 4NP)	Residential led	0.07	Yes	8	Maybe	Yes	No	No
CCB39	MC/14/1772 - 389 High Street, Chatham (ME4 4PG)	Residential led	0.06	Yes	24	No	No	No	No
CCB4	MC/19/0573 - 3 New Road, Chatham (ME4 4QJ)	Residential led	0.22	No	50	Maybe	Yes	No	No
CCB41	MC/19/0573 - 5 Otway Terrace, Chatham, ME4 5JU	Residential led	0.07	Yes	7	Maybe	Yes	No	No
CCB44	409 High Street, Chatham (ME4 4NU)	Residential led	0.03	No	2	No	No	No	No
CCB46	MC/19/3009, MC/19/0211, MC/20/1257, MC/20/3102 - land on the north side of Chatham Hill, Chatham, ME4 4PL	Residential led	0.03	No	2	No	No	No	No
CCB49	Medway Automatic Telephone Exchange, Best Street, Chatham, (ME4 4AB)	Residential led	0.55	Yes	150	No	No	Yes	No
CCB6	Chatham 2019, Chatham High St & Best St 2010, Pentagon 2005 - 1 and 2 Fullagers Yard, High Street, Chatham, ME4 4AS	Residential led (Mixed-use)	0.39	No	50	No	No	No	No
CCB7	MC/19/2136	Residential led (Mixed-use)	0.05	Yes	9	Maybe	Yes	No	Yes
CCB8	MC630, MC/20/3237 - Pentagon Centre, Chatham, ME4 4AJ	Residential led	0.16	Yes	164	Maybe	Yes	No	Yes
CCB9	MC/18/0715, Chatham 2019, Chatham High St & Best St 2010	Residential led	0.06	Yes	32	Maybe	Yes	No	Yes
CHR11	MC/16/0365	Residential led	0.14	No	8	Maybe	Yes	No	No
CHR14	Port Medway Marina, Station Road, Cuxton, Rochester, ME2 1AB	Residential led (Mixed-use)	11.4	Yes	49	No	No	No	No
CHR16	Diggerland, Roman Way, Rochester, ME2 2NU	Non-residential	8.95		0	No	No	No	No
CHR17	Diggerland, Roman Way, Rochester, ME2 2NU	Non-residential	3.73		0	No	No	No	No
CHR18	Ed Logistics, Roman Way, Rochester, ME2 2NF	Non-residential	1.28		0	No	No	No	No
CHR20	Morgan & Co (Strood) Ltd, Knight Road, Rochester, ME2 2BA	Residential led	3.69	Yes	172	No	No	Yes	No
CHR6	MC/19/0994 - Land Adjacent To Balancing Pond St Andrews Park Halling Kent	Residential led	1	Yes	88	Maybe	Yes	No	No
FH1	MC/19/1556	Non-residential	14.91		0	No	No	No	No
FP1	Star Hill to Sun Pier 2004 - land and buildings on the South side of High Street, Rochester, ME1 1BT	Residential led	0.6	Yes	111	No	Yes	No	No
FP10	122 Ordnance Street, Chatham, HE4 6SG	Residential led	2.46	Yes	170	No	Yes	No	No
FP11	Grays Of Chatham Ltd, 1-19 High Street, Chatham, ME4 4EN	Residential led (Mixed-use)	0.59	Yes	200	No	Yes	No	Yes
FP12	land and buildings on the South side of Gundulph Road, Chatham, ME4 4ED	Residential led	0.28	Yes	70	No	No	Yes	No
FP14	MC/18/3379 - 73 High Street Chatham Medway ME4 4EE	Residential led	0.01	Yes	6	Maybe	Yes	No	Yes
FP16	MC/22/0514 - First Floor 74 High Street Chatham Medway ME4 4DS	Residential led (Mixed-use)	0.02	Yes	6	Maybe	Yes	No	Yes
FP17	MC/21/0082	Residential led	0.02	No	5	No	No	No	No
FP18	Chatham 2019, Chatham Centre & Waterfront 2008	Residential led	0.32	No	40	No	No	No	Yes
FP19	Chatham 2019, Chatham Centre & Waterfront 2008	Residential led	1.66	No	146	No	No	No	Yes
FP2	325 High Street, Rochester, ME1 1DA	Residential led	0.03	No	1	No	No	No	Yes
FP22	MC/18/1412	Residential led	0.14	No	12	No	No	No	No
FP23	Chatham 2019, Chatham Centre & Waterfront 2008	Residential led	0.32	No	63	No	No	No	Yes

FP25	land on the south eastern side of Railway Street, Chatham, ME4 4RJ- an d unregistered	Residential led (Mixed-use)	2.59	Yes	121	No	No	No	Yes
FP4	K827384, Star Hill to Sun Pier 2004	Residential led	0.03	No	1	No	No	No	No
FP6	MC/14/0193 - University For The Creative Arts Fort Pitt Rochester ME1 1DZ	Residential led	0.78	Yes	120	No	Yes	No	No
FP8	MC/18/1737 - Our Zone Pattens Lane Rochester Medway ME1 2RB	Residential led	0.54	No	20	Yes	Yes	No	No
GN11	Land on the south east side of Tangmere Close, Gillingham, ME7 2TN	Residential led	0.2	No	9	No	No	No	No
GN13	Wharfland to the north west of Owens Way, Gillingham, ME7 2RS	Residential led	2.41	Yes	98	No	No	Yes	No
GN14	#N/A	Residential led	0.79	Yes	81	No	No	No	No
GN15	Land lying to the north of Pier Road, Gillingham, ME7 1FJ	Residential led (Mixed-use)	5.87	Yes	445	No	No	No	No
GN3	Depot at Pier Approach Road, Gillingham, ME7 1RX	Residential led	1.24	Yes	176	No	No	Yes	No
GN4	MC/19/1705	Residential led	0.05	No	8	Yes	Yes	No	No
GN5	MC/19/1924- Land At The Corner Of Ingram Road And Railway Street Gillingham Kent	Residential led	0.02	No	5	Yes	Yes	No	No
GN6	Gillingham No.3 and 4 ; Pier Road, Gillingham, ME7 1TT	Residential led (Mixed-use)	3.86	Yes	200	No	No	No	No
GN8	Land adjacent to 176 Grange Road, Gillingham	Residential led	0.12	Yes	17	No	Yes	No	Yes
GS10	Gillingham 2019	Residential led (Mixed-use)	0.08	No	18	No	No	No	No
GS11	MC/13/0482 - 146 Canterbury Street Gillingham ME7 5UB	Residential led	0.07	No	8	No	No	No	No
GS13	Gillingham Town Centre 2007 - Gillingham Telephone Exchange, Green Street, Gillingham, (ME7 5TH)	Residential led	0.28	No	12	No	No	No	No
GS14	MC/22/1091 - 105-107 High Street Gillingham Medway ME7 1BL	Residential led (Mixed-use)	0.03	Yes	6	Yes	Yes	No	Yes
GS19	Gillingham 2019, Gillingham Town Centre 2007 - 48 Green Street, Gillingham (ME7 1XA)	Residential led	0.14	No	57	No	Yes	No	No
GS2	2b Connaught Road, Gillingham, ME7 4QD	Residential led	1.28	Yes	45	No	No	No	No
GS20	MC/16/2405 - 208 Canterbury Street Gillingham ME7 5XG	Residential led	0.04	No	5	Yes	Yes	No	No
GS23	MC/21/1220 - 1A Milton Road Gillingham Medway ME7 5LP	Residential led	0.03	Yes	5	Yes	Yes	No	No
GS26	MC/22/0236 MC/16/1443 - 82 Jeffery Street Gillingham Medway ME7 1DB	Residential led	0.14	Yes	14	No	No	No	Yes
GS30	MC622, MC/21/3111 - Doctors Surgery 19 Railway Street Gillingham Medway ME7 1XQ	Residential led	0.02	Yes	5	Yes	Yes	No	No
GS32	MC/21/3147 -50 Nelson Road Gillingham Medway ME7 4LJ	Residential led	0.07	No	3	No	Yes	No	No
GS33	MC/19/2446 - 97-111 Rainham Road Gillingham Medway ME7 5NQ	Residential led	0.25	Yes	12	No	Yes	No	No
GS35	land lying to the north of Rainham Road, Gillingham, ME7 5NQ	Residential led	0.21	Yes	12	No	No	No	No
GS37	Land to the south of Railway Street, Gillingham, Medway, ME7 1YQ	Residential led (Mixed-use)	1.9	Yes	136	No	No	No	Yes
GS4	MC620, MC/20/2541 - 5 - 7 Mill Road Gillingham Medway ME7 1HL	Residential led	0.09	Yes	24	No	Yes	No	Yes
GS5	MC/18/0455 - 1 Arden Street Gillingham Medway ME7 1HG	Residential led	0.01	Yes	7	Expired	Yes	No	Yes
GS6	MC626, MC/21/1017, MC/21/1035 - 60-64 Canterbury Street Gillingham Medway ME7 5UJ	Residential led	0.03	Yes	5	No	Yes	Yes	No
GS7	MC625, MC/21/0993 - 22-32 Canterbury Street Gillingham Medway ME7 5TX	Residential led (Mixed-use)	0.07	Yes	14	No	Yes	No	Yes
GS8	MC/20/2108 - 2-4 Canterbury Street Gillingham Medway ME7 5TS	Residential led (Mixed-use)	0.02	Yes	6	No	Yes	No	Yes
HHH11	Land at Ratcliffe Highway, Hoo, Rochester, ME3 8PX	Residential led	12.1	Yes	210	Withdrawn	No	No	No
HHH24	Whitehouse Farm, Stoke Road, Hoo St Werburgh	Residential led	3.18	Yes	100	No	No	No	No
HHH25	Whitehouse Farm, Stoke Road, Hoo St Werburgh	Residential led	3.78	Yes	100	no	Yes	No	No
HHH29	Land at Christmas Lane, High Halstow	Residential led (Mixed-use)	1.91	Yes	65	No	No	No	No
HHH32	Abbots Court, Stoke Road, Hoo, Rochester, ME3 9LS	Residential led	0.79	Yes	6	No	No	No	No
HHH33	Land at Stoke Road, Hoo	Residential led	23.51	Yes	330	No	No	No	No
HHH37	London Medway Commercial Park (Plot 8A), James Swallow Way, Rochester, ME3 9GX	Non-residential	1.05	Yes	0	No	No	No	No
HHH38	London Medway Commercial Park (Plot 2), James Swallow Way, Rochester, ME3 9GX	Non-residential	9.15	Yes	0	No	No	No	No
HHH39	London Medway Commercial Park (Plot 1c), James Swallow Way, Rochester, ME3 9GX	Non-residential	5.91	Yes	0	No	No	Yes	No
HHH4	MC/20/0009 - 42 Chattenden Lane Chattenden Rochester Medway ME3 8NL	Residential led	0.09	No	4	No	Yes	No	No
HHH41	land adjoining Rivers View, Ratcliffe Highway, Hoo, Rochester, ME3 8QB	Residential led	0.99	Yes	25	No	No	No	No
HHH5	Land at Beacon Hill Lane, Chattenden, Rochester	Residential led	1.96	Yes	65	No	No	No	No
HHH8	Land between Peninsula Way and Main Road, Hoo St Werburgh	Residential led (Mixed-use)	30.81	Yes	450	No	No	No	No
HW11	Land to the west of Hempstead Road, Hempstead, Gillingham, Medway, ME7 3TQ	Residential led	3.35	Yes	60	No	No	No	No
HW5	Hempstead Valley District centre, Hempstead Valley Drive Gillingham, ME7 3PD	Residential led (Mixed-use)	10.37	Yes	266	No	No	No	Yes
HW6	Land at Blowers Wood, Maidstone Road, Hempstead	Residential led	4	Yes	88	No	No	No	No
HW8	Grain Road, Gillingham, ME8 0NB	Residential led	0.16	No	5	No	No	No	No
L11	MC/22/0053 - 54 Beacon Road Chatham Medway ME5 7BP	Residential led	0.13	Yes	7	No	Yes	No	No

L12	Jezreels Tower Works, 111 Rainham Road, Gillingham (ME7 5NQ)	Residential led	0.41	Yes	12	No	Yes	No	No
L2	MC/19/1599 - Land At Rear Of 52 Dagmar Road Luton Chatham Medway ME4 5HB	Residential led	0.07	No	5	Withdrawn	No	No	No
L3	55A Castle Road, Chatham (ME4 5HU)	Residential led	0.11	No	7	Withdrawn	No	No	No
L7	MC/19/2949 - 272-274 Luton Road Luton Chatham Medway ME4 5BU	Residential led	0.04	Yes	6	No	No	Yes	No
L9	Haywards Of Medway, 352-356, Luton Road, Chatham, ME4 5BD	Residential led	0.31	Yes	22	No	No	No	No
LW10	Land west of of Capstone Road, Chatham, Kent	Residential led	0.31	Yes	10	No	No	No	No
LW2	MC/20/1632 - 419 Walderslade Road Walderslade Chatham Medway ME5 9LL	Residential led	0.13	Yes	18	No	Yes	Yes	No
LW3	MC600, MC/20/0221 - Hallwood House Kestrel Road Lordswood Chatham Medway	Residential led	0.27	Yes	41	No	Yes	No	No
LW4	Land off North Dane Way, Chatham, Kent - MC/19/0765	Residential led	27.41	Yes	800	No	Yes	No	No
LW5	MC/21/1403	Residential led (C2 use)	0.18	Yes	0	No	No	No	No
LW7	MC/18/0556 - Gibraltar Farm Ham Lane Hempstead Gillingham Medway ME7 3JJ	Residential led	23.13	Yes	450	No	Yes	No	No
REWW3	Freehold land and buildings on the north side of Cecil Road and on the west side of Delce Road, Rochester, ME1 2HW	Residential led	0.34	Yes	11	No	No	No	No
RN11	MC630, MC/20/2696 - Kingdom Hall Bloors Lane Rainham Gillingham ME8 7DS	Residential led	0.5	Yes	20	No	Yes	No	No
RN18	MC558, MC/19/0298 - 76 Station Road Rainham Gillingham Medway ME8 7PJ	Residential led	0.04	Yes	8	Expired	Yes	No	Yes
RN22	MC458, MC/18/1782 - 311 Station Road Rainham Gillingham Medway ME8 7PU	Residential led	0.1	Yes	8	Expired	Yes	No	No
RN23	Land West of Station Road (Temple), Station Road, Rainham	Residential led	2.19	Yes	75	No	Yes	No	No
RN24	MC/22/2240 - 33 High Dewar Road Rainham Gillingham Medway ME8 8DN	Residential led	0.06	Yes	9	No	Yes	No	Yes
RN25	MC/21/1108 - Pampa House Station Road Rainham Gillingham Medway ME8 7UF	Residential led	0.22	Yes	5	No	Yes	No	No
RN27	MC/18/1796 - Land South Of Lower Rainham Road Rainham Gillingham Medway ME8 7UD	Residential led	9.16	Yes	200	No	Yes	No	No
RN28	Land North of Moor Street, East of Otterham Key Lane, Rainham, Kent	Residential led	3.68	Yes	66	No	Yes	No	No
RN29	Actionpoint, Chestnut Court, Otterham Quay Lane, Rainham, Gillingham, ME8 8AS	Residential led	0.38	Yes	25	No	No	No	No
RN30	Land at Seymour Road, Seymour Road, Rainham, Kent, ME8 8PY	Residential led	4.31	Yes	90	No	No	No	No
RN31	Land Fronting Seymour Road (title K420792), Seymour Road, Rainham, ME8 8PY	Residential led	6.44	Yes	80	No	No	No	No
RN32	Land at Seymour Road, Rainham, Kent	Residential led	2.06	Yes	48	Maybe	Yes	No	No
RSE9	Orchard Cottage, Meresborough Road, Rainham, Gillingham, ME8 8QJ	Residential led	0.9	Yes	40	No	No	No	No
RWB1	MC/20/2107, MC/19/0691, MC/20/0734 - Bridgeside Warwick Crescent Borstal Rochester Medway ME1 3LE	Residential led	0.27	Yes	12	No	Yes	No	No
RWB10	MC/19/2566, Corporation St Development Framework 2008	Non-residential	0.14	Yes	0	No	No	No	No
RWB11	MC614, MC/20/2815, MC/18/2467 - Dental Surgery 1 - 4 Eastgate Court Rochester Medway ME1 1EU	Residential led	0.03	Yes	5	No	No	No	Yes
RWB12	land and premises on the North East side of East Row and the North West side of Victoria Street, Rochester, ME1 1XN	Residential led	0.13	Yes	3	No	No	No	No
RWB14	Corporation St Development Framework 2008 - land and buildings on the North side of Blue Boar Lane, Rochester, ME1 1NH	Residential led	0.12	No	15	No	No	No	No
RWB15	MC/20/0932, Corporation St Development Framework 2008 - St Clements House Corporation Street Rochester Medway ME1 1NL	Residential led	0.26	Yes	44	No	Yes	No	No
RWB17	Corporation St Development Framework 2008	Residential led	0.06	No	3	No	No	No	No
RWB18	Corporation St Development Framework 2008 - Rochester Delivery Office, 165 High Street, Rochester (ME1 1AA)	Residential led	0.09	No	4	No	No	No	No
RWB19	MC/19/0038, Corporation St Development Framework 2008, Star Hill to Sun Pier 2004 - Bardell Terrace Rochester Kent ME1 1NG	Residential led (Mixed-use)	1.57	Yes	331	No	Yes	No	No
RWB2	MC/15/2332 - Medway Bridge Marina Manor Lane Borstal Rochester Medway ME1 3HS	Residential led	1.78	Yes	36	No	No	No	No
RWB20	Corporation St Development Framework 2008, Star Hill to Sun Pier 2004	Residential led	0.08	No	15	No	No	No	No
RWB21	Corporation St Development Framework 2008, Star Hill to Sun Pier 2004 - land and buildings at St Margaret's Banks, Rochester, ME1 1HY	Residential led	0.08	No	15	No	No	No	No
RWB23	Star Hill to Sun Pier 2004	Non-residential	0.14	Yes	0	No	No	No	No
RWB25	Land to the east of Gas House Road, Rochester, Medway, ME1 1QN	Residential led	0.59	Yes	106	No evidence	No	No	No

RWB3	Land to the east of Victoria Terrace, Borstal, Rochester, Medway, ME1 3JH	Residential led		0.13	Yes	4	No	No	No	No
RWB4	Land lying to the north of Valley View Road, Rochester, ME1 3NU	Residential led		0.3	Yes	9	No	No	No	No
RWB6	MC/21/2352 - Land At The Junction Of Maidstone Road And Sir Evelyn Road Rochester Kent Corporation St Development Framework	Residential led		0.16	Yes	7	Withdrawn	No	No	No
RWB8	2008 - Chambers of Rochester Ltd, High Street, Rochester (ME1 1QB)	Residential led (Mixed-use)		0.06	Yes	2	Withdrawn	No	No	No
RWB9	2008 Corporation St Development Framework - Chambers of Rochester Ltd, High Street, Rochester (ME1 1QB)	Residential led (Mixed-use)		0.08	Yes	3	Withdrawn	No	No	No
SNF10	Strood 2019, Strood 2009 - Strood Service Station, 3 London Road, Rochester (ME2 3HX)	Residential led (Mixed-use)		0.25	No	16	No	No	No	No
SNF12	MC/20/0104 - Land North Of Clarendon Drive Strood Kent ME2 3LT	Residential led (Mixed-use)		0.3	No	6	Expired	Yes	No	No
SNF13	Strood 2019, Strood 2009 - Deacon Trading Centre, Knight Road, Rochester (ME2 2AU)	Residential led (Mixed-use)		3.32	No	373	No	No	No	No
SNF15	H R H Estates, 167c High Street, Strood, Rochester, ME2 4TH	Residential led (Mixed-use)		2.37	Yes	450	No	No	No	No
SNF17	MC/22/3002 - Land Rear Of 161-163 High Street Strood Rochester Medway ME2 4TH	Residential led		0.02	Yes	6	Maybe	Yes	No	Yes
SNF18	Strood 2019 - land on the east side of Knight Road, Strood, ME2 2AU	Residential led (Mixed-use)		2.72	No	27	No	No	No	No
SNF20	Keystone Health Centre, Gun Lane, Strood, Rochester, ME2 4UL	Residential led		0.23	Yes	15	No	No	No	No
SNF21	Strood 2019 - 76 Commercial Road, Rochester (ME2 2AD)	Residential led (Mixed-use)		0.64	No	44	No	No	No	No
SNF22	Strood 2019, Strood 2009 - land on the north and south of Commercial Road, Strood, ME2 4TG	Residential led (Mixed-use)		0.29	No	47	No	No	No	No
SNF23	MC619, MC/21/0370 - 100-110 High Street Strood Rochester Medway ME2 4TS	Residential led (Mixed-use)		0.06	Yes	8	No	Yes	No	No
SNF24	MC/22/1200 - 13 - 17 North Street Strood Rochester Medway ME2 4SL	Residential led (Mixed-use)		0.05	Yes	7	Maybe	Yes	No	No
SNF27	MC/19/2211, MC/21/0675 - 24 Gun Lane Strood Rochester Medway ME2 4UJ	Residential led		0.09	Yes	9	Maybe	Yes	No	No
SNF30	MC/15/20975Strood 2019 - 85-91 (odd), High Street, Strood, Rochester (ME2 4TL)	Residential led (Mixed-use)		0.11	Yes	9	Expired	Yes	No	No
SNF31	MC/22/0108 - 70-76 High Street Strood Rochester Medway ME2 4AR	Residential led (Mixed-use)		0.03	Yes	8	Maybe	Yes	No	No
SNF32	MC601, MC/20/2783 - 22 & 24 St Marys Road Strood Rochester Medway ME2 4DF	Residential led		0.03	Yes	6	Expired	Yes	No	No
SNF34	Strood 2019 - Strood Service Station High Street Strood Rochester ME2 4AB	Residential led (Mixed-use)		0.17	Yes	52	No	No	No	Yes
SNF35	Phase 1 Site (Civic Centre) Strood Riverside South Of Rochester Bridge Strood	Residential led (Mixed-use)		2.65	Yes	195	No	No	No	No
SNF36	Strood 2019 - North west of Strood High Street.	Residential led (Mixed-use)		0.03	No	6	No	No	No	No
SNF37	Strood 2019 - National Tyres & Autocare, Station Road, Strood, Rochester (ME2 4BA)	Residential led (Mixed-use)		0.14	No	13	No	No	No	No
SNF38	MC/17/2044 - resubmission of MC/16/3137 1-7 Canal Road Strood Rochester	Residential led		0.07	Yes	12	Expired	Yes	No	No
SNF39	Strood 2019, Strood Watfront 2018, Strood 2009 - Kingswear Gardens, Rochester	Residential led		1.61	No	101	No	No	No	No
SNF41	Strood Riverside, Rochester, ME2 4DT	Residential led (Mixed-use)		4.97	Yes	602	No	No	No	No
SNF43	MC/20/1867 - Land North Of Commissioners Road Strood Rochester Kent ME2 4EQ	Residential led		3.75	Yes	123	No	Yes	No	No
SNF44	Sparkling Hand Car Wash, Frindsbury Hill, Rochester, ME2 4JR - Resubmission of MC/20/1046 Garden Service Station Frindsbury Hill Wainscott Rochester Medway ME2 4JR	Residential led		0.07	Yes	6	Expired	Yes	No	No
SNF5	MC/19/1708 - 18 Broom Hill Road And Land To Rear Strood Rochester ME2 3LE	Residential led		0.35	Yes	8	Expired	Yes	No	No
SNF8	land on the North East side of Priory Road, Rochester, ME2 2EG	Residential led (Mixed-use)		0.26	Yes	19	No	No	No	No
SNF9	Land to the north west side of Cuxton Road, Rochester, ME2 2DA	Residential led (Mixed-use)		0.45	Yes	60	No	No	No	Yes
SR14	MC/21/1694 - Land South Of View Road Cliffe Woods Rochester Kent	Residential led		5.15	Yes	68	Maybe	Yes	No	No
SR25	MC/21/0302 - Land South Of Berwick Way, East Of Frindsbury Hill And North And West Of Parsonage Lane (known As Manor Farm) Frindsbury Rochester Medway	Residential led (Mixed-use)		16.95	Yes	181	No	Yes	No	No
SR30	Veetee, Unit 2, Enterprise Close, Medway City Estate, Rochester, ME2 4LY	Residential led (Mixed-use)		0.56	Yes	102	No	No	Yes	No
SR31	Veetee Foods Ltd, Veetee House, Sir Thomas Longley Road, Medway City Estate, Rochester, ME2 4DU	Residential led (Mixed-use)		1.39	Yes	311	No	No	Yes	No
SR34	Riverside House, 58 Sir Thomas Longley, Rochester ME2 4FN	Residential led		0.34	Yes	30	No	Yes	No	No
SR36	Land lying to the east of Anthony's Way, Rochester, ME2 4QP	Residential led (Mixed-use)		2.25	Yes	200	No	No	No	No
SR37	Veetee Rice Ltd, Neptune Close, Medway City Estate, Rochester, ME2 4LT	Residential led (Mixed-use)		1.89	Yes	428	No	No	Yes	No
SR38	Land on east side of Neptune Way, Rochester, ME2 4NA	Residential led (Mixed-use)		1.32	Yes	100	No	No	Yes	No
SR4	Land west of Town Road, Cliffe Woods	Residential led		6.29	Yes	130	No	No	No	No
SR40	Waterside Court, Neptune Way, Medway City Estate, Rochester, ME2 4NZ	Residential led (Mixed-use)		0.87	Yes	200	No	No	Yes	No
SR47	MC/17/2272 - Fleet House Upnor Road Upnor Rochester ME2 4UP - resubmission MC/22/2813	Residential led		0.13	Yes	7	Maybe	Yes	No	No
SR48	MC/19/2361 - Patmans Wharf Upnor Road Upnor Rochester Medway ME2 4UY	Residential led		0.25	Yes	8	Maybe	Yes	No	No
SR49	Shaftesbury House, Upnor Road, Upnor	Residential led		0.24	Yes	15	No	No	No	No

SR50	land lying to the South of Elm Avenue, Hoo, St Werburgh, ME2 4XB	Residential led	0.27	No	5	No	No	No	No
SR51	Land adjoining Cliffe Saltings, Cliffe, Rochester, ME3 7SN	Residential led (Mixed-use)	21.62	Yes	250	Maybe	Yes	No	No
SR7	Land South of Buckland Road, Cliffe Wood	Residential led	8.35	Yes	45	Maybe	No	No	No
SW1	MC/20/1192 - Garage Site Rear Of 23-29 Seagull Road Strood Rochester Medway ME2 2SQ	Residential led	0.17	Yes	12	Maybe	Yes	No	No
SW2	MC/20/2641 - Resubmission of MC/20/2641 Zara Gardens 1 Bligh Way Strood Kent MC/22/1717	Residential led	0.78	No	106	No	No	No	No
SW3	MC/19/1731 - Resubmission of MC/19/1731 Hawthorn Road Clinic Hawthorn Road Strood Rochester Medway ME2 2HU	Residential led	0.11	No	9	Yes	Yes	No	No
SW5	MC/17/4320 - Garages Adjacent To 186 Laburnum Road Strood Rochester Medway ME2 2LD	Residential led	0.15	Yes	6	Maybe	Yes	No	No
SW6	MC/19/1815 - Land To The Side And Rear Of Tesco Express 178 Darnley Road Strood Rochester ME2 Medway ME2 2UW	Residential led	0.14	Yes	6	Expired	Yes	No	No
SW7	MC/17/4318 - Land Adjacent 2 & 4 Laburnum Road Strood Kent ME2 2LA	Residential led	0.08	Yes	6	Expired	Yes	No	No
SW8	MC/18/1938 - 29 London Road Strood Rochester Medway ME2 3JB	Residential led	0.06	No	7	Expired	Yes	No	No
T3	MC/16/1990 - Formerly Lennox Wood Retirement Home Petham Green Twydall Gillingham ME8 6SZ	Residential led	0.43	Yes	20	Expired	Yes	No	No
W3	land on the south side of Watling Street, Chatham, ME5 7HE	Residential led	0.31	Yes	9	No	No	No	No
W4	Pro Box, 41 Barnsole Road, Gillingham, ME7 4DT	Residential led	0.03	Yes	5	Expired	Yes	No	No
W7	MC635, MC/21/2015 - Canada House Barnsole Road Gillingham Medway ME7 4JL	Residential led	0.39	Yes	21	Maybe	Yes	No	No

APPENDIX 4

Assessment of Medway Small Sites Housing Allocations

Strategic Site Ref	Address	Site use	Site Area	Available	Yield	Delivered before 2025	Planning submitted	Existing Employment	Retail
FP14	MC/18/3379 - 73 High Street Chatham Medway ME4 4EE	Residential led	0.01	Yes	6	Maybe	Yes	No	Yes
GS5	MC/18/0455 - 1 Arden Street Gillingham Medway ME7 1HG	Residential led	0.01	Yes	7	Expired	Yes	No	Yes
CCB23	20 Batchelor Street, Chatham (ME4 4B)	Residential led (Mixed-use)	0.02	No	5	Yes	Yes	No	No
FP17	MC/21/0082	Residential led	0.02	No	5	No	No	No	No
GN5	MC/19/1924- Land At The Corner Of Ingram Road And Railway Street Gillingham Kent	Residential led	0.02	No	5	Yes	Yes	No	No
GS30	MC622, MC/21/3111 - Doctors Surgery 19 Railway Street Gillingham Medway ME7 1XQ	Residential led	0.02	Yes	5	Yes	Yes	No	No
CCB33	MC/19/0752	Residential led	0.02	No	6	No	No	No	No
FP16	MC/22/0514 - First Floor 74 High Street Chatham Medway ME4 4DS	Residential led (Mixed-use)	0.02	Yes	6	Maybe	Yes	No	Yes
GS8	MC/20/2108 - 2-4 Canterbury Street Gillingham Medway ME7 9TS	Residential led (Mixed-use)	0.02	Yes	6	No	Yes	No	Yes
SNF17	MC/22/3002 - Land Rear Of 161-163 High Street Strood Rochester Medway ME2 4TH	Residential led	0.02	Yes	6	Maybe	Yes	No	Yes
	MC615, MC/21/0603, Chatham 2019,								
CCB24	Chatham High St & Best St 2010 - Land to the north of High Street, Chatham, Medway, ME4 4BN	Residential led (Mixed-use)	0.02	Yes	9	Yes	Yes	No	yes
FP2	325 High Street, Rochester, ME1 1DA	Residential led	0.03	No	1	No	No	No	Yes
FP4	K827364, Star Hill to Sun Pier 2004	Residential led	0.03	No	1	No	No	No	No
CCB44	409 High Street, Chatham (ME4 4NU)	Residential led	0.03	No	2	No	No	No	No
	MC/19/3009, MC/19/0211, MC/20/1257,								
CCB46	MC/20/3102 - land on the north side of Chatham Hill, Chatham, ME4 4PL	Residential led	0.03	No	2	No	No	No	No
GS23	MC/21/1220 - 1A Milton Road Gillingham Medway ME7 5LP	Residential led	0.03	Yes	5	Yes	Yes	No	No
GS6	MC626, MC/21/1017, MC/21/1035 - 60-64 Canterbury Street Gillingham Medway ME7 5UJ	Residential led	0.03	Yes	5	No	Yes	Yes	No
RWB11	MC614, MC/20/2815, MC/18/2467 - Dental Surgery 1 - 4 Eastgate Court Rochester Medway ME1 1EU	Residential led	0.03	Yes	5	No	No	No	Yes
W4	Pro Box, 41 Barnsole Road, Gillingham, ME7 4DT	Residential led	0.03	Yes	5	Expired	Yes	No	No
GS14	MC/22/1091 - 105-107 High Street Gillingham Medway ME7 1BL	Residential led (Mixed-use)	0.03	Yes	6	Yes	Yes	No	Yes
SNF32	MC601, MC/20/2783 - 22 & 24 St Marys Road Strood Rochester Medway ME2 4DF	Residential led	0.03	Yes	6	Expired	Yes	No	No
SNF36	Strood 2019- North west of Strood High Street.	Residential led (Mixed-use)	0.03	No	6	No	No	No	No
CCB36	MC/16/4568 - 330 High Street, Chatham (ME4 4NR)	Residential led (Mixed-use)	0.03	No	7	No	No	No	Yes
SNF31	MC/22/0108 - 70-76 High Street Strood Rochester Medway ME2 4AR	Residential led (Mixed-use)	0.03	Yes	8	Maybe	Yes	No	No
CCB3	MC/20/2905 - 1 Cambridge Terrace, Chatham (ME4 4RG)	Residential led (Mixed-use)	0.03	Yes	13	Maybe	Yes	Yes	No
GS20	MC/16/2405 - 208 Canterbury Street Gillingham ME7 5XG	Residential led	0.04	No	5	No	Yes	No	No
L7	MC/19/2949 - 272-274 Luton Road Luton Chatham Medway ME4 5BU	Residential led	0.04	No	6	No	Yes	No	No
RN18	MC558, MC/19/0298 - 76 Station Road Rainham Gillingham Medway ME8 7PJ	Residential led	0.04	Yes	8	Expired	Yes	No	Yes
CCB19	Abbey Auction Rooms, 1-3, Rhode Street, Chatham, ME4 4AL	Residential led (Mixed-use)	0.04	Yes	13	Maybe	Yes	No	Yes
CCB21	263, 265, 267 and 269 High Street, Chatham (ME4 4BZ)	Residential led (Mixed-use)	0.04	Yes	14	No	Yes	No	Yes
SNF24	MC/22/1200 - 13 - 17 North Street Strood Rochester Medway ME2 4SL	Residential led (Mixed-use)	0.05	Yes	7	Maybe	Yes	No	No
GN4	MC/19/1705	Residential led	0.05	No	8	Yes	Yes	No	No
CCB7	MC/19/2136	Residential led (Mixed-use)	0.05	Yes	9	Maybe	Yes	No	Yes
	Corporation St Development Framework								
RWB8	2008 - Chambers of Rochester Ltd, High Street, Rochester (ME1 1QB)	Residential led (Mixed-use)	0.06	Yes	2	Withdrawn	No	No	No
	Corporation St Development Framework								
RWB17	2008	Residential led	0.06	No	3	No	No	No	No
SW8	MC/18/1938 - 29 London Road Strood Rochester Medway ME2 3JB	Residential led	0.06	No	7	Expired	Yes	No	No
SNF23	MC619, MC/21/0370 - 100-110 High Street Strood Rochester Medway ME2 4TS	Residential led (Mixed-use)	0.06	Yes	8	No	Yes	No	No
RN24	MC/22/2240 - 33 High Dewar Road Rainham Gillingham Medway ME8 8DN	Residential led	0.06	Yes	9	No	Yes	No	Yes
CCB39	MC/14/1772 - 389 High Street, Chatham (ME4 4PG)	Residential led	0.06	Yes	24	No	No	No	No
CCB27	Ghengis Fireworks, 100 The Brook, Chatham, ME4 4LB - 100 The Brook, Chatham (ME4 4LB)	Residential led (Mixed-use)	0.06	Yes	30	No	No	No	Yes
	MC/18/0715, Chatham 2019, Chatham High St & Best St 2010	Residential led	0.06	Yes	32	Maybe	Yes	No	Yes
CCB9	Chatham 2019, Chatham Centre & Waterfront 2008 - Crown House, 55-59 The Brook, Chatham (ME4 4LQ) - King Street, Chatham 105A, The Brook, Chatham, ME4 4YT	Residential led	0.06	No	193	No	No	No	No
GS32	MC/21/3147 - 50 Nelson Road Gillingham Medway ME7 4LJ	Residential led	0.07	No	3	No	Yes	No	No
L2	MC/19/1599 - Land At Rear Of 52 Dagmar Road Luton Chatham Medway ME4 5HB	Residential led	0.07	No	5	Withdrawn	No	No	No
	Sparkling Hand Car Wash, Frindsbury Hill, Rochester, ME2 4JR - Resubmission of MC/20/1046 I								
SNF44	Garden Service Station Frindsbury Hill Wainscott Rochester Medway ME2 4JR	Residential led	0.07	Yes	6	Expired	Yes	No	No

Key
Non-Residential
Suitable Allocations
Discounted Sites

CCB41	MC/19/0573 - 5 Otway Terrace, Chatham, ME4 5UJ	Residential led		0.07 Yes	7 Maybe	Yes	No	No
CSB38	MC/22/0491 - 346a High Street, Chatham (ME4 4NP)	Residential led		0.07 Yes	8 Maybe	Yes	No	No
G811	MC/19/0482 - 146 Canterbury Street Gillingham ME7 5UB	Residential led		0.07 No	8 No	No	No	No
SNF38	MC/17/2044 - resubmission of MC/16/3137 1-7 Canal Road Strood Rochester	Residential led		0.07 Yes	12 Expired	No	No	No
GS7	MC625, MC/21/0993 - 22-32 Canterbury Street Gillingham Medway ME7 5TX Corporation St Development Framework - Chambers of Rochester Ltd, High Street, Rochester (ME1 1QB) 2008	Residential led (Mixed-use)		0.07 Yes	14 No	Yes	No	Yes
RWB9	MC/17/4318 - Land Adjacent 2 & 4 Laburnum Road Strood Kent ME2 2LA	Residential led (Mixed-use)		0.08 Yes	3 Withdrawn	No	No	No
SW7	MC/18/1383, Chatham 2019, Chatham High St & Best St 2010, Pentagon 2005 - Pentagon Centre, Chatham, ME4 4AJ	Residential led		0.08 Yes	6 Expired	Yes	No	No
CCB17	Corporation St Development Framework	Residential led (Mixed-use)		0.08 Yes	14 Withdrawn	No	No	Yes
RWB20	2008, Star Hill to Sun Pier 2004	Residential led		0.08 No	15 No	No	No	No
RWB21	Corporation St Development Framework 2008, Star Hill to Sun Pier 2004 - land and buildings at St Margaret's Banks, Rochester, ME1 1HY	Residential led		0.08 No	15 No	No	No	No
GS10	Gillingham 2019	Residential led (Mixed-use)		0.08 No	18 No	No	No	No
CCB30	MC/18/1585, MC/16/4304, Chatham	Residential led (Mixed-use)		0.08 Yes	21 Maybe	Yes	No	No
HHH4	MC/20/0009 - 42 Chattenden Lane Chattenden Rochester Medway ME3 8NL Corporation St Development Framework 2008 - Rochester Delivery Office, 166 High Street, Rochester (ME1 1AA)	Residential led		0.09 No	4 No	Yes	No	No
RWB18	MC/19/2211, MC/21/0675 - 24 Gun Lane Strood Rochester Medway ME2 4UJ	Residential led		0.09 No	4 No	No	No	No
SNF27	Chatham High St & Best St 2010 - land on the east side of Church Street, Chatham, ME4 4BT	Residential led		0.09 Yes	9 Maybe	Yes	No	No
CCB28	MC620, MC/20/2541 - 5 - 7 Mill Road Gillingham Medway ME7 1HL	Residential led		0.09 No	11 No	No	No	No
G84	MC620, MC/20/2541 - 5 - 7 Mill Road Gillingham Medway ME7 1HL	Residential led		0.09 Yes	24 No	Yes	No	Yes
RN22	MC458, MC/18/1782 - 311 Station Road Rainham Gillingham Medway ME8 7PU	Residential led		0.1 Yes	8 Expired	Yes	No	No
L3	55A Castle Road, Chatham (ME4 5HU)	Residential led		0.11 No	7 Withdrawn	No	No	No
SNF30	MC/18/2097Strood 2019 - 85-91 (odd), High Street, Strood, Rochester (ME2 4TL)	Residential led (Mixed-use)		0.11 Yes	9 Expired	Yes	No	No
SW3	MC/19/1731 - Resubmission of MC/19/1731 Hawthorn Road Clinic Hawthorn Road Strood Rochester Medway ME2 2HU	Residential led		0.11 No	9 Yes	Yes	No	No
CCB22	Pentagon Service Station, The Brook, Chatham, ME4 4LU - and other titles Corporation St Development Framework 2008 - land and buildings on the North side of Blue Boar Lane, Rochester, ME1 1NH	Residential led		0.11 No	14 No	Yes	No	No
RWB14	Land adjacent to 176 Grange Road, Gillingham	Residential led		0.12 No	15 No	No	No	No
GN8	land and premises on the North East side of East Row and the North West side of Victoria Street, Rochester, ME1 1XN	Residential led		0.12 Yes	17 No	Yes	No	Yes
RWB12	Land to the east of Victoria Terrace, Borsial, Rochester, Medway, ME1 3JH	Residential led		0.13 Yes	3 No	No	No	No
RWB3	MC/22/0053 - 54 Beacon Road Chatham Medway ME5 7BP	Residential led		0.13 Yes	4 No	No	No	No
L11	MC/17/2272 - Fleet House Upnor Road Upnor Rochester ME2 4UP - resubmission MC/22/2813	Residential led		0.13 Yes	7 No	Yes	No	No
SR47	MC/20/1632 - 419 Walderslade Road Walderslade Chatham Medway ME5 9LL	Residential led		0.13 Yes	7 Maybe	Yes	No	No
LW2	Development Framework 2008	Residential led		0.13 Yes	18 No	Yes	No	No
RWB10	Star Hill to Sun Pier 2004	Non-residential		0.14 Yes	0 No	No	No	No
RWB23	MC/19/1815 - Land To The Side And Rear Of Tesco Express 178 Darnley Road Strood Rochester ME2 Medway ME2 2UW	Non-residential		0.14 Yes	0 No	No	No	No
SW6	MC/19/1815 - Land To The Side And Rear Of Tesco Express 178 Darnley Road Strood Rochester ME2 Medway ME2 2UW	Residential led		0.14 Yes	6 Expired	Yes	No	No
CHR11	MC/16/0365	Residential led		0.14 No	8 Maybe	Yes	No	No
FP22	MC/18/1412	Residential led		0.14 No	12 No	No	No	No
SNF37	Strood 2019 - National Tyres & Autocare, Station Road, Strood, Rochester (ME2 4BA)	Residential led (Mixed-use)		0.14 No	13 No	No	No	No
GS26	MC/22/0236 MC/16/1443 - 82 Jeffery Street Gillingham Medway ME7 1DB	Residential led		0.14 Yes	14 No	No	No	Yes
GS19	Gillingham 2019, Gillingham Town Centre 2007 - 48 Green Street, Gillingham (ME7 1XA)	Residential led		0.14 No	57 No	Yes	No	No
SW5	MC/17/4320 - Garages Adjacent To 186 Laburnum Road Strood Rochester Medway ME2 2LD	Residential led		0.15 Yes	6 Maybe	Yes	No	No
CCB11	Chatham High Street & Best Street 2010	Residential led		0.15 No	30 No	No	Yes	No
HW8	Grain Road, Gillingham, ME8 ONB	Residential led		0.16 No	5 No	No	No	No
RWB6	MC/21/2352 - Land At The Junction Of Maidstone Road And Sir Evelyn Road Rochester Kent	Residential led		0.16 Yes	7 Withdrawn	No	No	No
CCB8	MC630, MC/20/3237 - Pentagonal Centre, Chatham, ME4 4AJ	Residential led		0.16 Yes	164 Maybe	Yes	No	Yes
AS31	Land at the Street, Rochester, ME3 9RT	Residential led (Mixed-use)		0.17 Yes	10 No	No	No	No

SW1	MC/20/1192 - Garage Site Rear Of 23-29 Seagull Road Strood Rochester Medway ME2 2SQ	Residential led	0.17	Yes	12	Maybe	Yes	No	No
SNF34	Strood 2019 - Strood Service Station High Street Strood Rochester ME2 4AB	Residential led (Mixed-use)	0.17	Yes	52	No	No	No	Yes
LW5	MC/21/1403	Residential led (C2 use)	0.18	Yes	0	No	No	No	No
AS10	The White Horse, The Street, Upper Stoke, Rochester (ME3 9RT)	Residential led	0.18	Yes	5	Yes	Yes	No	No
CCB12	Land at 9 Clover Street, Chatham, ME4 4DT	Residential led (Mixed-use)	0.18	Yes	24	No	No	No	No
GN11	Land on the south east side of Tangmere Close, Gillingham, ME7 2TN	Residential led	0.2	No	9	No	No	No	No
GS35	land lying to the north of Rainham Road, Gillingham, ME7 5NQ	Residential led	0.21	Yes	12	No	No	No	No
CCB16	Chatham 2019, Chatham Centre & Waterfront 2008 - Crown House, 55-59 The Brook, Chatham (ME4 4LQ)	Residential led	0.21	No	26	No	No	Yes	No
RN25	MC/21/1108 - Pampa House Station Road Rainham Gillingham Medway ME8 7UF	Residential led	0.22	Yes	5	No	Yes	No	No
CCB4	MC/19/0573 - 3 New Road, Chatham (ME4 4QJ)	Residential led	0.22	No	50	Maybe	Yes	No	No
AS29	Burneys Farm and Nord Farm, Stoke and Allhallows, ME3 9SL	Residential led	0.23	Yes	7	No	No	No	No
SNF20	Keystone Health Centre, Gun Lane, Strood, Rochester, ME2 4UL	Residential led	0.23	Yes	15	No	No	No	No
CCB1	Unit 3, New Cut, Chatham, ME4 6AD	Residential led	0.23	Yes	35	No	No	No	No
SR49	Shaftesbury House, Upnor Road, Upnor	Residential led	0.24	Yes	15	No	No	No	No
SR48	MC/19/2361 - Patmans Wharf Upnor Road Upnor Rochester Medway ME2 4UY	Residential led	0.25	Yes	8	Maybe	Yes	No	No
GS33	MC/19/2446 - 97-111 Rainham Road Gillingham Medway ME7 5NQ	Residential led	0.25	Yes	12	No	Yes	No	No
SNF10	Strood 2019, Strood 2009 - Strood Service Station, 3 London Road, Rochester (ME2 3HX)	Residential led (Mixed-use)	0.25	No	16	No	No	No	No
SNF8	land on the North East side of Priory Road, Rochester, ME2 2EG	Residential led (Mixed-use)	0.26	Yes	19	No	No	No	No
RWB15	MC/20/0932, Corporation St. Development Framework 2008 - St Clements House Corporation Street Rochester Medway ME1 1NL	Residential led	0.26	Yes	44	No	Yes	No	No
SR50	land lying to the South of Elm Avenue, Hoo, St Werburgh, ME2 4XB	Residential led	0.27	No	5	No	No	No	No
RWB1	MC/20/2107, MC/19/0691, MC/20/0734 - Bridge side Warwick Crescent Borstal Rochester Medway ME1 3LE	Residential led	0.27	Yes	12	No	Yes	No	No
LW3	MC600, MC/20/0221 - Hallwood House Kestrel Road Lordswood Chatham Medway	Residential led	0.27	Yes	41	No	Yes	No	No
GS13	Gillingham Town Centre 2007 - Gillingham Telephone Exchange, Green Street, Gillingham, (ME7 5TH)	Residential led	0.28	No	12	No	No	No	No
FP12	land and buildings on the South side of Gundulph Road, Chatham, ME4 4ED	Residential led	0.28	Yes	70	No	No	Yes	No
SNF22	Strood 2019, Strood 2009 - land on the north and south of Commercial Road, Strood, ME2 4TG	Residential led (Mixed-use)	0.29	No	47	No	No	No	No
SNF12	MC/20/0104 - Land North Of Clarendon Drive Strood Kent ME2 3LT	Residential led	0.3	No	6	Expired	Yes	No	No
RWB4	Land lying to the north of Valley View Road, Rochester, ME1 3NU	Residential led	0.3	Yes	9	No	No	No	No
W3	land on the south side of Watling Street, Chatham, ME5 7HE	Residential led	0.31	Yes	9	No	No	No	No
LW10	Land west of of Capstone Road, Chatham, Kent	Residential led	0.31	Yes	10	No	No	No	No
L9	Haywards Of Medway, 352-356, Luton Road, Chatham, ME4 5BD	Residential led	0.31	Yes	22	No	No	No	No
FP18	Chatham 2019, Chatham Centre & Waterfront 2008	Residential led	0.32	No	40	No	No	No	Yes
FP23	Chatham 2019, Chatham Centre & Waterfront 2008	Residential led	0.32	No	63	No	No	No	Yes
AS2	Fenn Farm, Fenn Street, St. Mary Hoo, Rochester, ME3 8QS	Residential led	0.34	Yes	4	No	No	No	No
REWW3	Freehold land and buildings on the north side of Cecil Road and on the west side of Deice Road, Rochester, ME1 2HW	Residential led	0.34	Yes	11	No	No	No	No
SR34	Riverside House, 58 Sir Thomas Longley, Rochester ME2 4FN	Residential led	0.34	Yes	30	No	No	Yes	No
CCB15	220-240 High Street, Chatham, ME4 4AN	Residential led (Mixed-use)	0.34	Yes	90	No	No	Yes	No
SNF5	MC/19/1708 - 18 Broom Hill Road And Land To Rear Strood Rochester ME2 3LE	Residential led	0.35	Yes	8	Expired	Yes	No	No
RN29	Actionpoint, Chestnut Court, Otterham Quay Lane, Rainham, Gillingham, ME8 8AS	Residential led	0.38	Yes	25	No	No	No	No
W7	MC635, MC/21/2015 - Canada House Barnsole Road Gillingham Medway ME7 4IL	Residential led	0.39	Yes	21	Maybe	Yes	No	No
CCB6	Chatham 2019, Chatham High St & Best St 2010, Pentagon 2005 - 1 and 2 Fullagers Yard, High Street, Chatham, ME4 4AS	Residential led (Mixed-use)	0.39	No	50	No	No	No	No
CCB10	Chatham High Street & Best Street 2010 - carpark ME4 4RH	Residential led (Mixed-use)	0.39	No	72	No	No	No	No
L12	Jezeels Tower Works, 111 Rainham Road, Gillingham (ME7 5NQ)	Residential led	0.41	Yes	12	No	Yes	No	No
T3	MC/16/1990 - Formerly Lennox Wood Retirement Home Petham Green Twydale Gillingham ME8 6SZ	Residential led	0.43	Yes	20	Expired	Yes	No	No
CCB26	Chatham 2019, Chatham High St & Best St 2010 - 100 The Brook, Chatham (ME4 4LB)	Residential led (Mixed-use)	0.43	No	49	No	No	No	Yes
SNF9	Land to the north west side of Cuxton Road, Rochester, ME2 2DA	Residential led (Mixed-use)	0.45	Yes	60	No	No	No	Yes
AS16	Mackays Court Farm, Lower Stoke, Rochester, ME3 9R)	Residential led (Mixed-use)	0.47	Yes	25	No	No	No	No

RN11	MC630, MC20/2696 - Kingdom Hall Bloors Lane Rainham Gillingham ME8 7DS	Residential led	0.5	Yes	20	No	Yes	No	No
CCB20	land and buildings on the north side of Whitaker Street, Chatham, ME4 4AL	Residential led (Mixed-use)	0.5	No	175	No	Yes	No	Yes
CCB34	324-326 High Street, Chatham (ME4 4NR)	Residential led (Mixed-use)	0.51	No	36	No	No	No	Yes
FP8	MC/18/1737 - Our Zone Pattens Lane Rochester Medway ME1 2RB	Residential led	0.54	No	20	Yes	Yes	No	No
CCB49	Medway Automatic Telephone Exchange, Best Street, Chatham, (ME4 4AB)	Residential led	0.55	Yes	150	No	Yes	Yes	No
SR30	Veetee, Unit 2, Enterprise Close, Medway City Estate, Rochester, ME2 4LY	Residential led (Mixed-use)	0.56	Yes	102	No	No	Yes	No
RWB25	Land to the east of Gas House Road, Rochester, Medway, ME1 1QN	Residential led	0.59	Yes	106	No evidence	No	No	No
FP11	Grays Of Chatham Ltd, 1-19 High Street, Chatham, ME4 4EN	Residential led (Mixed-use)	0.59	Yes	200	No	Yes	No	Yes
FP1	Star Hill to Sun Pier 2004 - land and buildings on the South side of High Street, Rochester, ME1 1BT	Residential led	0.6	Yes	111	No	No	Yes	No
SNF21	Strood 2019 - 76 Commercial Road, Rochester (ME2 2AD)	Residential led (Mixed-use)	0.64	No	44	No	No	No	No
SW2	MC/20/2641 - Resubmission of MC/20/2641 Zara Gardens 1 Bligh Way Strood Kent MC/22/1717	Residential led	0.78	No	106	No	No	No	No
FP6	MC/14/0193 - University For The Creative Arts Fort Pitt Rochester ME1 1DZ	Residential led	0.78	Yes	120	No	Yes	No	No
HHR32	Abbots Court, Stoke Road, Hoo, Rochester, ME3 9LS	Residential led	0.79	Yes	6	No	No	No	No
GN14	#N/A	Residential led	0.79	Yes	81	No	No	No	No
CCB31	MC/20/2782, Chatham 2019, Chatham	Residential led	0.8	Yes	179	No	Yes	No	No
AS15	Centre & Waterfront 2008 - the south west side of Cross Street, Chatham, ME4 4BJ	Residential led	0.86	Yes	15	No	Yes	No	No
SR40	Land at Middle Stoke, Grain Road, Rochester ME3 9RS	Residential led (Mixed-use)	0.87	Yes	200	No	No	Yes	No
RSE9	Waterside Court, Neptune Way, Medway City Estate, Rochester, ME2 4NZ	Residential led	0.9	Yes	40	No	No	No	No
HHR41	Orchard Cottage, Meresborough Road, Rainham, Gillingham, ME8 8QJ	Residential led	0.99	Yes	25	No	No	No	No
CHR6	land adjoining Rivers View, Ratcliffe Highway, Hoo, Rochester, ME3 8QB	Residential led	1	Yes	88	Maybe	Yes	No	No
	MC/19/0994 - Land Adjacent To Balancing Pond St Andrews Park Halling Kent	Residential led							

