

## Model Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

Name of the Local Plan to which this representation relates:

Medway Local Plan

Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

#### 2. Agent's Details (if applicable)

Title	Mr	
First Name	Andrew	
Last Name	Wilford	
Job Title (where relevant)	Director of Land and Planning	
Organisation (where relevant)	Esquire Developments Ltd	
Address Line 1	The Old Laundry	
Line 2	Green Street Green	
Line 3	Longfield	
Line 4		
Post Code	DA2 8EB	
Telephone Number		
E-mail Address (where relevant)		

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## Part B – Please use a separate sheet for each representation

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Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

✓
✓

No


4.(2) Sound

Yes

✓
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No

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4 (3) Complies with the  
Duty to co-operate

Yes

✓
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No

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Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See accompanying Representations

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See accompanying Representations

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

See accompanying Representations

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**For details of our data privacy policy please see:**

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# **REPRESENTATIONS TO MEDWAY COUNCIL REGULATION 19 LOCAL PLAN CONSULTATION**

**Representation submitted  
by Esquire Developments  
Ltd**

**Rainham Parkside  
Village**

**August 2025**





# ESQUIRE

DEVELOPMENTS

Esquire Developments  
Studio 3 The Old Laundry  
Green Street Green Road  
Longfield, DA2 8EB

**Tel:** 01474 706 184  
**e-mail:** [awilford@esquiredevelopments.com](mailto:awilford@esquiredevelopments.com)

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## **1.0 INTRODUCTION**

- 1.1 These representations have been prepared by Esquire Developments Ltd. Esquire Developments is a multi-award-winning SME developer based in Longfield, Kent.
- 1.2 These representations respond to Medway Council's (the Council) Regulation 19 Local Plan Consultation July 2025.
- 1.3 Esquire Developments has land interest across Medway and is currently delivering a number of sites across Medway, including Cliffe Woods, Fenn Corner, Grain, Rainham and soon to be breaking ground in Hoo. Esquire Developments will soon have delivered up to 600 dwellings in Medway alone in the last 10 years. Esquire has engaged through the Plan-making process including promoting further development at:
- Rainham Parkside Village (Bloors Farm and Pump Farm), Lower Rainham; and
  - Flanders Farm, Hoo.
- 1.4 These representations focus on the content of the Plan and the draft allocation for Rainham Parkside Village (Bloors Farm and Pump Farm). Proposals for Flanders Farm, Hoo are subject to separate representations.
- 1.5 Notwithstanding specific land interests, our response has been prepared in objective terms, in response to the content of the consultation and supporting Evidence Base and in accordance with legal, procedural and soundness requirements of legislation and the National Planning Policy Framework.
- 1.6 The most recent version of the National Planning Policy Framework was published December 2024 (NPPF 2024). The Plan would be Examined under the provisions of this version of the Framework including the tests of soundness set out at paragraph 36 of the Framework.
- 1.7 In summary, we support the Council's aspirations to adopt an up-to-date Plan and believe this is critical to achieving the step change necessary to deliver genuine improvements to quality of life across Medway including delivering good quality development to meet identified needs.
- 1.8 As set out in these representations we consider there are areas of the Plan which could be strengthened in order to achieve the tests of soundness. This is achievable through production of supplementary work or modification of the Plan.



## **About Esquire Developments**

- 1.9 Esquire Developments is a multi-award winning SME Housebuilder based in Longfield, Kent. Founded in 2011, it has quickly established itself through the delivery of high quality bespoke residential developments in Kent and Sussex. It was awarded Gold for Best Small House Builder in the Country 2020 by WhatHouse.
- 1.10 Esquire Developments has adopted a tailored approach to its developments adapting designs and layouts to reflect local characteristics and respect local community's needs. This is done through expert local knowledge and understanding of a place, but also positively engaging with the local community allowing for a focussed approach to planning, design and greater understanding of the needs of the local community.
- 1.11 Each development is bespoke and there are no fixed house types. This allows us to be totally flexible when it comes to the choosing the right mix and design of each home. This is reflected in the high-quality architecture and use of materials, but also quality of open spaces and the environment in which each development sits within.
- 1.12 Esquire Developments also delivers commercial buildings such as office space and children's nurseries to complement developments where local demand identifies such a need. This means our developments can meet a local community's needs in a number of ways, whether that is for people to live, work and play.
- 1.13 As an SME Housebuilder, Esquire Developments can expediently deliver a high-quality product that brings variation and choice to the market and complement volume housebuilders, but with a real community focus.

## 2.0 THE LOCAL PLAN

- 2.1 This section of our Representations reviews and responds to the draft Local Plan and its Evidence Base, seeking to ensure a “sound” Local Plan is adopted which meets housing and other needs in full across the Plan Period.
- 2.2 Separate representations have been submitted by the Kent SME Developer Network which provides direct response to draft policies which are not repeated here. Further, our comments in respect of Esquire’s site at Flanders Farm (and the corresponding allocation) are provided in Section 3.
- 2.3 We believe adoption of an up-to-date Local Plan is critical to achieving the step change necessary to deliver genuine improvements to quality of life across Medway including delivering good quality development to meet identified needs. The Plan should be underpinned by robust evidence ensuring it is fully justified and is effective in delivering on its aspirations.
- 2.4 In order to achieve this, we consider there are areas where the Plan and evidence base could be further strengthened. This is as set out below.

### **Plan Period**

- 2.5 Para 22 of the NPPF sets out that strategic polices should look ahead over a minimum 15-year period from adoption. The new Local Plan proposes a Plan period from April 2026 to March 2041, i.e. 15-years with the final monitoring year being 2040/41. This would require the Plan to be adopted before end of March 2027.
- 2.6 This provides limited room for delay in adoption in order to achieve the necessary 15-year Plan period. We consider it likely the Examination process will take a year or longer which would take adoption being March 2027.
- 2.7 **To avoid any danger that a delay to the adoption of the plan results in less than the required 15 year timeframe, we suggest the Council consider if a modification to extend to the Plan period to at least 2041/42 to provide flexibility and thus ensuring the Plan covers the required 15-year period post adoption.**

- 2.8 This may be achievable without the need to allocation additional sites, with some strategic sites likely delivering beyond the current the Plan period. This should be reviewed and clarified.

### **Housing Requirement**

- 2.9 As set out in the NPPF and planning guidance there may be justification for setting a housing requirement at a level above that of minimum housing needs. This includes provision of housing for neighbouring areas, infrastructure investment and increasing affordable housing delivery.
- 2.10 The Council has assessed 2no. growth options through its Sustainability Appraisal work of (1) meeting minimum local housing needs in full, and (2) meeting minimum local housing needs in full + 2,000 homes to address unmet needs of Gravesham Borough.
- 2.11 This follows a standing request from Gravesham Borough Council (GBC) for the Council to accommodate 2,000 additional homes to assist GBC in addressing their unmet needs. The Council has discounted this on the basis no evidence has been presented by GBC to demonstrate this is necessary, therefore concluding it not justified.
- 2.12 There appears to be no consideration to increasing housing delivery above minimum housing needs to either increase affordable housing delivery or spreading the cost of infrastructure over an increased number of homes.
- 2.13 **We recommend further work be completed to establish whether there is justification for a potential uplift in housing requirements in light of affordable housing needs and/or infrastructure needs (and costs). If there is justification, this should be tested through the Sustainability Appraisal as a reasonable alternative growth option.**

### **Affordable Housing Delivery**

- 2.14 The Council's Local Housing Needs Assessment (LHNA, February 2025) identifies an affordable housing need for Medway of 436 affordable dwellings per annum. This equates to 26.7% of the minimum housing needs figure.



- 2.15 This is in the context of the number of households on the waiting list being at its highest since 2018 (at 4,830 households) and there only being 1,505 affordable completions across the period 2012 – 2023 (i.e. 137 per annum).
- 2.16 Whilst the Plan seeks to meet minimum housing needs in full, there is no explicit affordable housing target set within a policy.
- 2.17 **We recommend be clearly stated to provide transparency, support consistency in decision-making, and ensure the plan is positively prepared and effective in meeting identified needs.**
- 2.18 The Plan recognises through Policy T3 that viability will vary across sites with Policy T3 stating:
- *In high value areas, including the Hoo Peninsula strategic sites and suburban greenfield sites, 30% of all residential units proposed.*
  - *In lower value areas, 25% of all dwellings proposed in greenfield areas, and 10% of all residential units proposed on previously developed land.*
  - *In line with the Planning Practice Guidance, it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.*
- 2.19 There is a lack of clarity on how the “high” and “lower” areas have been defined. Without ward-level definitions or a spatial map illustrating where the different value areas apply, it is not possible to determine with certainty which affordable housing threshold applicable to a given site.
- 2.20 **We recommend the Plan be supported by a detailed map or appendix clearly defining the value areas referenced in Policy T3, to provide certainty for applicants and decision-makers.**
- 2.21 As part this, there should be consideration for whether the proposed spatial strategy is likely to achieve affordable needs in full or if there may be justification for increasing supply in order to address any shortfall.
- 2.22 The Viability Assessment (June 2025) through sensitivity testing identifies that greenfield sites have the greatest capacity to bear planning obligations (including affordable housing) but brownfield / regeneration sites are the “least viable” and are often unable to support

affordable housing. These brownfield / regeneration sites make up a substantial element of identified supply (circa. 1/3).

- 2.23 We recommend work be completed to consider the level of affordable housing realistically expected from identified sites across the Plan-period to establish whether affordable needs will be met in full.**

### **Infrastructure Delivery**

- 2.24 The successful delivery of infrastructure is vital to ensuring the Plan meets growth needs in full and achieves sustainable growth. The importance of this is emphasised throughout the Plan and evidence base.
- 2.25 The lack of a plan-led system over the past decade and beyond has the consequence of infrastructure delivery not being managed in a coordinated manner. The delivery of infrastructure has generally not kept pace with the growth of communities across Medway.
- 2.26 The Infrastructure Delivery Plan (IDP, June 2025) identifies there to be significant infrastructure challenges notably due to limited capacity and congestion on the road network, increased potential of flood risk and pressures on healthcare and education.
- 2.27 Whilst the IDP is intended to be a live document, there are a number of areas where further clarification is needed, most notably the overall requirements for development-led funding and how this will be attributed to development.
- 2.28 The Local Plan Viability Assessment (June 2025) includes an assumption of £18,000 per unit in developer contributions (for strategic infrastructure, mitigation and SAMMS payment), but much higher on strategic sites (i.e. circa. £26k at Rainham Parkside Village and higher elsewhere). The notable difference for strategic sites being the SI06 assumptions (highway and non-highway related).
- 2.29 It is not clear how those assumptions have been derived with no clear link between the conclusions and figures of the IDP and the Viability Assessment. For instance, Rainham Parkside Village whilst there is reference to the allocation (RN9) land use requirements, the Infrastructure Delivery Schedule does not reference these or provide estimated costs for on or off-site infrastructure.

- 2.30 **We recommend further clarity be provided through an updated / supplementary IDP which confirms the infrastructure expectations (inc. contributions) for identified and windfall development across the Plan period. This should make clear the expectations for both strategic and non-strategic sites.**



### 3.0 RAINHAM PARKSIDE VILLAGE

3.1 The Plan supports the allocation of Rainham Parkside Village at Bloors Farm and Pump Farm through Policy SA10 for:

- Up to 750 homes;
- A local centre including:
  - A children's nursery;
  - 3ha of land for a two-form entry primary school;
  - A community hub;
  - A health hub;
  - A care home; and
  - Convenience floorspace to meet the day-to-day needs of the local community;
- Up to 15 homes for use as temporary living accommodation; and
- 8ha of land for an eighth-form entry secondary school.

3.2 Critically, the Plan and corresponding policy identifies the Site will be delivered by SME housebuilders coming forward under a consortium to be delivered in SME-size parcels. This will be led by a Master SME Developer (Esquire Developments).

3.3 The role of SMEs has been fully recognised by successive Central Governments and the wider Industry in how important their role is to helping deliver the 1.5m homes. Separate representations have been submitted by the Kent SME Developer Network which provide wider context and information on this and these representations do not seek to repeat those here – but wholly support the Kent SME Developer representations to the plan.

#### **Rainham and Lower Rainham**

3.4 Rainham is identified as a District Centre in the Local Plan, along with Rochester, Strood, Gillingham and Hempstead Valley. It is a large built-up area providing an extensive range of day-to-day services including schools, retail, food and drink, employment and leisure facilities. There is widespread public transport provision throughout Rainham including a variety of bus services providing links to other settlements and the mainline train station with services to London (including high-speed services) and coastal towns.

- 3.5 Lower Rainham is located north of Rainham, comprising a smaller village that sits linear along Lower Rainham Road and is partly covered by a Conservation Area.
- 3.6 The overarching Spatial Development Strategy of the Plan identifies a blended approach to urban, suburban and rural with the focus of growth outside of the urban regeneration areas will be on the expansion of suburban neighbourhoods and villages where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.
- 3.7 Para 14.11.1 of the Plan acknowledges that growth has occurred in / around Rainham in the past 10 years on suburban sites but this has often been without supporting infrastructure and resulted in increased pressure on local services.
- 3.8 Reflecting this, in line with the Spatial Development Strategy, the Plan identifies opportunities for large scale growth to be supported in a plan-led way which addresses concerns relating to recent ad hoc development and the lost infrastructure not delivered by the small scale ad hoc sites.
- 3.9 The allocation of Rainham Parkside Village, along with the associated infrastructure will help rectify the lost infrastructure and help deliver improved services for the local area in a planned and sustainable way.

### **Rainham Parkside Village**

- 3.10 Rainham Parkside Village has been promoted by Esquire Developments as a SME Consortium Opportunity for high-quality residential-led development that celebrates the rural context, landscape and development patterns and avoids suburban approaches.
- 3.11 A Concept Plan is included at Figure 15 of the Plan which shows how the Site could be split into residential, education and community uses, along provision for open space, landscaping and movement.
- 3.12 A Development Framework Document (DFD, June 2025) has been prepared by BPTW on behalf of Esquire Developments and is submitted alongside these representations (**Appendix A**).

- 3.13 The DFD supports the continued promotion of the Site and demonstrates how it will come forward in line with the Council's and Esquire's aspirations including providing further detail on the design led approach and how and why the scheme is materially different to the previous proposals put forward in 2019 for a much larger scheme (The Appeal Scheme).
- 3.14 A number of background documents have been prepared to support the vision and the DFD summarises the position of these studies, including where necessary demonstrating specific housing needs.
- 3.15 As detailed in the DFD, the concept for Rainham Parkside Village is based on the principles of:
- Demonstrating the urban to rural transition;
  - Creating a mosaic of "farmsteads" plots;
  - Creating a new village heart with non residential uses;
  - Securing a network of safe and direct routes to the wider leisure corridor to the north and links to the National Trail;
  - Establishing a comprehensive active travel network defined by green corridors following the historic lanes, field lines hedgerows and tree clusters;
  - Providing a green buffer along the rail-line acting as a buffer and a key east-west leisure route.
- 3.16 The proposals respond to the identified constraints and opportunities to deliver a truly landscape-led mixed-use development which responds appropriately to its surrounding context.
- 3.17 A detailed concept plan is included within the DFD, consistent with that within the Plan, which demonstrates how 750 dwellings alongside commercial / community uses, education use, and significant public open space and green infrastructure provision could be delivered on Site. The DFD demonstrates detailed consideration has been given to opportunities for temporary accommodation, self-build and school strategy as part of the design process.
- 3.18 The proposals have been designed in line with the 15 minutes neighbourhood principles as set out in Policy T26 of the Plan. The Site can deliver a connected grid of walking and cycling routes that promotes health and wellbeing, framed by existing and proposed green infrastructure. It further promotes the opportunity to improve north south pedestrian and



cycle connectivity along pump lane, enhancing the connectivity to the country park and riverside as well as improving traffic whilst maintaining the semi-rural character.

- 3.19 The Plan recognises the SME Consortium approach is supported by the NPPF (para 73) which identifies small and medium sites, including sub-division of larger sites, can help speed up delivery of homes. Further, as referenced at para 14.11.7 of the Plan, the parcelling of Rainham Parkside Village will allow for wider variation in design of new housing helping to avoid market saturation. This will come forward under Rural Design Code which will help shape the principles of development both here and across Medway generally.
- 3.20 The DFD recognises this, identifying the sub-dividing of plots will assist in increasing SME delivery across the Site, with 1no. outlet potentially delivering 40 dwellings per annum, 2no. delivering 80 dwellings per annum, and so on.
- 3.21 The Council's trajectory (Strategic Housing Land Supply Assessment, June 2025) reflects this identifying delivery of first 40 homes in 2028/29 (Year 3), stepping up to 160 homes in 2030/31. Esquire, as master developers, will be responsible for the early phase/s alongside delivery of strategic infrastructure, with several other SME developers expected to be delivering other residential parcels. This trajectory is realistic and justified.
- 3.22 The Site has the potential to deliver homes, both market and affordable and community infrastructure early within the Plan period. This is critical for the success of the Plan.
- 3.23 Further, Rainham Parkside Village will lead to a range of significant economic, social and environmental benefits aligned with the overarching priorities and aspirations of the Plan. Page 62 – 64 of the DFD highlights these benefits through an Economic Infographic and Social Value High Level Mapping. This identifies the proposals would secure:

### **Economic**

- Construction - Direct employment of 282FTE and indirect employment of 113FTE, alongside GVA of £149.5mil.
- Operation Phase – Generation of £54.0m GVA through new residents and £20.1m per annum in convenience, leisure and comparison spend.
- Employment – 316FTE direct employment in Local Centre generating £13.5m GVA per annum and £0.2mil annual business rates.

## Social

- Delivering of new homes and affordable homes, including a range of typologies and tenures;
- Provision of a range of quality social care and community services including care provision, education and healthcare; and
- Improvements for health and wellbeing including new walking / cycling routes, open spaces and areas of play.

## Environmental

- Carbon efficient homes (fabric first approach) alongside EV charging points for each dwelling and provision of air source heat pumps;
- Significant provision of new open spaces (circa. 16.2ha) delivering a range of benefits including access to public spaces, ecological enhancement and new green and blue infrastructure;
- A minimum of 10% biodiversity net gain; and
- Promotion of active travel including mobility hubs.

3.24 An Affordable Housing Statement (Turley, August 2025, **Appendix B**) has been prepared which re-iterates a number of comments made earlier in these representations but also highlights the significant benefit affordable housing delivery will bring to Medway. As detailed in the Statement there is an acute and persistent affordable housing crisis in Medway, characterised by escalating need, chronic under-delivery and worsening market conditions.

3.25 Sites like Rainham Parkside Village have the potential to deliver substantial number of affordable homes. This should be treated as a matter of strategic priority.

3.26 In accordance with emerging Policy T3, the proposals seek to deliver 30% affordable housing equating to 225 affordable homes. This will be split in line with the findings of the Medway Local Housing Needs Assessment (2025) with circa. 40% social rent, 25% affordable rent and 35% shared ownership.

- 3.27 To support the promotion of the Site and informing the constraints and opportunities set out in the DFD, technical and environmental consultant work has been completed. The outcome of this initial work is as summarised below.

### **Landscape**

- 3.28 To review the Site and inform the emerging proposals, with the goal of ensuring a truly landscape-led approach, a Landscape Sketchbook / Design Report (March, May 2025, **Appendix C**) has been produced.
- 3.29 The Report considers the context of the Site, noting the proposals are not to “shy away from the investable alteration of character” but instead consider how best to come forward within this setting including learning lessons from the previous dismissed appeal.
- 3.30 The Site forms part of a semi-rural landscape, within a setting defined by orchard character, historic hedgerows and strategic views. The site falls within the Gillingham Riverside Area of Local Landscape Importance (ALLI). Public access around the Site is limited to a single bridleway crossing east-west through part of the Site and the flanking lanes running north-south. Tall hedgerows flank the lanes through and around the site, and linear tree belt encloses the bridleway.
- 3.31 The estuary edge to the north is referred to by the Council as a ‘leisure corridor’ due to the unique landscape setting, long-distance walking routes, open amenity space and country park. Parking is provided, however access via walking and cycling is challenging due to poor connections from Rainham and Twydall. A function of the Gillingham Riverside ALLI is to offer green corridors providing access to the countryside, which the proposals have potential to deliver and provide enjoyable connections towards the leisure corridor.
- 3.32 Further, there are significant opportunities for beneficial landscape improvements through the emerging proposals including improved access to the countryside, reinforcing boundaries with nature hedgerows and trees, developing the character of Pump Lane and providing public open spaces.
- 3.33 The proposals, through a landscape-led approach, seek to maximise opportunities to connect local people across sustainable transport routes with important green spaces, buffer

functionality in enhancing conservation area settings and softening views across the wider landscape, and opportunities to reflect the ALLI character through green infrastructure.

- 3.34 Detailed consideration for how key landscape spaces could look and function is as described in the Landscape Sketchbook / Design Report. This emphasises the design quality Esquire are seeking to secure across the Site.
- 3.35 Further, the Landscape Sketchbook / Design Report includes a comparison of the emerging proposals against the previous appeal scheme, highlighting how the approach taken in this instance helps address deficiencies in the landscape approach of that scheme.
- 3.36 It is considered the approach to landscape taken at this time has ensured the emerging proposals are underpinned by a robust landscape-led approach which will assist in ensuring development can come forward on the Site which respects and enhances its landscape context.

## Highways

- 3.37 To highlight the suitability of the Site from a highway's perspective, including access and sustainable transport, a Transport and Movement Representations Note (Pell Frischamm, August 2024, **Appendix D**) has been prepared.
- 3.38 As detailed in the note, the Site represents a sustainable opportunity for development in a location which is, subject to mitigation, and acceptable location from a highway's perspective. The proposals include a range of uses which support existing and future residents of the area, with the close proximity to these local services and amenities providing a genuine alternative to car-based travel to and from the site.
- 3.39 The proposals include internal street layouts and active travel routes which maximise the accessibility of and within the site by walking, wheeling, cycling, public transport and shared travel. Further, these provide connections to routes off-site to improve access to facilities and destinations in the wider area by sustainable modes.
- 3.40 The proposal will seek to establish sustainable travel behaviours from the outset through delivery of supporting active travel infrastructure and connectivity early in the development, thus ensuring active travel is the natural choice of mode for local journeys. This will include provision of a primary mobility hub alongside secondary hubs as needed to ensure sufficient

coverage across the Site. Further, bus service enhancement is proposed, through funding, extension and/or re-routing, which is supported by Arriva who current run bus service 1.

- 3.41 The note emphasises the clear differences between the development now being proposed and that previously dismissed at Appeal on the Site, notably including a significant reduction in the quantum of development. This, coupled together with the promotion of sustainable and active travel modes, will help to reduce the level of impact on the highway network.
- 3.42 It is therefore considered the Site is a wholly suitable location for the development proposed and this can be accommodated on the Site without severe impact on the wider highway network subject to any necessary off-site mitigation to be discussed and agreed with the highway authority in due course.

### **Ecology**

- 3.43 A Preliminary Ecological Appraisal Report (EPR, April 2025, **Appendix E**) has been prepared which reviews the ecological potential of the Site and emerging proposals.
- 3.44 The Site is comprised managed arable farmland, in use as intensively managed orchards with modified grassland. The majority of the on-site field boundaries are formed of non-native treeline and hedgerow planting.
- 3.45 The Site is not ecological designated (locally, nationally or internationally), however is in close proximity to designated sites of nature conservation including Medway Estuary and Marshes Special Protection Area (SPA) and Ramsar circa. 250m north. Initial work has identified the Site is not functionally linked to this designated site.
- 3.46 Proposals have been informed by the findings of ecological work to date with a view to 'protect', 'restore' and 'create' seeking to secure benefits for flora and fauna within the Site and wider area.
- 3.47 This and ongoing survey work will form the basis of plans for biodiversity gain and ecological management to support future application/s supported by initial recommendations for:
- Traditional orchard planting;
  - Flower-rich spaces for insects and people;

- Permanent water bodies;
- Native-mixed scrub; and
- Provision of structures for breeding / shelter of wildlife.

3.48 The appraisal report confirms the Site has sufficient space to secure 10% biodiversity net gain with the proposals presenting an opportunity to secure significant ecological benefits.

## Heritage

3.49 In order to understand and consider the heritage potential of the Site and emerging proposals a Heritage Assessment (HCUK Group, March 2025, **Appendix F**) and Archaeological Assessment (HCUK Group, February 2025, **Appendix G**) have been prepared.

3.50 In respect of built heritage, there are no designated assets within the Site. There are several Listed Buildings (Grade II\* and Grade II) located within 1km of the Site, alongside the Lower Rainham Conservation Area to the north and Lower Twydall Conservation Area to the west.

3.51 The Heritage Assessment reviews the significance and setting of these assets and assesses potential impacts arising from the emerging proposals on these. This considers that at worst the proposals would lead to less than substantial harm at the middle of the scale to the Grade II Listed Chapel House and Lower Rainham Conservation Area, with other assets experiencing LTSH at the lower end of the scale or no harm. A non-designated heritage asset (Bloors Oast) is identified to experience minor harm.

3.52 In all cases, the Assessment notes the identified heritage assets do not derive a major proportion of their significance and special interest from their settings, and the proposals would have no physical bearing on the heritage assets themselves.

3.53 Any harm would need to be weighed against the benefits of the scheme. At the previous appeal for the Site (as detailed below), the Inspector concluded the public benefits of the scheme would outweigh the heritage harm. The harm arising from the emerging proposals is comparable but potentially less, noting the reduced quantum and density of development and introduction of significant additional planting / open spaces.

3.54 In respect of archaeological interests, there is no known records within the Site. There is potential for early prehistoric archaeological remains to be present which would be

ascertained through a programme of investigative archaeological fieldwork at a time to be agreed with the Archaeological Officer either pre-determination or post-determination of application/s.

### **Air Quality**

- 3.55 An Air Quality Appraisal (SLR, February 2025, **Appendix H**) has been prepared to consider whether there are any existing air quality constraints which could affect the suitability of the Site for residential development.
- 3.56 As set out in the report, Medway has 4no. Air Quality Management Areas (AQMA), none of which affect the Site. The nearest is Rainham AQMA circa. 1km south.
- 3.57 Baseline air quality conditions at the Site are anticipated to be well-below local Air Quality Assessment Levels such that air quality does not present a constrain to development.
- 3.58 Any future applications for the Site would be supported by air quality assessments, in line with Medway's Air Quality Planning Guidance. This will identify any operational emission impacts and any mitigation requirements.

### **Noise**

- 3.59 A Land Promotion Noise Impact Assessment (SLR, April 2025, **Appendix I**) considered the acoustic environment in which the Site is located, in order to better understand any potential noise related constraints which need to be embed in design. This included a on-site baseline survey of existing noise.
- 3.60 The most prevalent environment noise source across the Site is from transportation sources, particularly road and rail. Within 25 meters of the railway, and circa 50m from Lower Rainham Road In an unmitigated configuration for daytime these areas of the site fall into moderate noise risk.
- 3.61 The majority of Site falls into low noise risk, with the negligible noise levels.

- 3.62 Emerging proposals for the Site can readily accommodate noise considerations through standoffs to key transportation noise sources and acoustic mitigation, including standard acoustic good practice.

### **Previous Appeal Decision**

- 3.63 The Site was subject to a previous proposal for up to 1,250 dwellings, local centre, 2-form entry primary school, care facilities and associated infrastructure submitted in June 2019 (ref. MC/19/1566). The application was refused by the Council in June 2020 for reasons relating to heritage, landscape, highways and loss of agricultural land.
- 3.64 The decision was subsequently appealed (ref. 3259868), which was recovered for the Secretary of State's determination.
- 3.65 The Appeal was dismissed with the Secretary of State agreeing with the Inspector that the adverse impacts of granting permission would significant and demonstrably, in that instance, outweigh the benefits of the scheme.
- 3.66 Whilst the benefits of housing delivery, affordable housing delivery, employment provision and biodiversity improvements carried substantial weight, it was concluded the proposals at that time would lead to significant landscape harm and severe residual impacts on the local road network.
- 3.67 The Appeal decision has influenced the emerging proposals for the Site, including the technical work undertaken to date. Promotion through the Plan affords the opportunity for the Site to come forward in a coordinated manner underpinned by Plan-led infrastructure provision.
- 3.68 The use of agricultural land is inevitable in the context of Plan-led approach which meets housing and other needs in full. This is reflected in the draft Plan which has sought to maximise brownfield / regeneration within the urban areas but recognises this will only deliver circa. 1/3 of overall needs across the Plan period.
- 3.69 The appeal decision has helped shape the Council's consideration as to how the Site could successfully come forward, as noted at para 14.11.5 – 14.11.6 of the Plan:



**A proposal from Small to Medium Enterprise (SME) housebuilders will deliver Rainham Parkside Village at Bloors Farm and Pump Farm, located to the east and to the west of Pump Lane respectively. It is important to note that Rainham Parkside Village will be entirely different to the development that was dismissed at appeal in 2021.**

**Rainham Parkside Village will comprise fewer homes (750), which will limit the degree of landscape impacts and local highway impacts. A wider mix of uses in a plan-led, larger scale development is intended to address concerns following ad hoc, smaller scale development.**

- 3.70 As set out in page 10 – 13 of the DFD, the previous appeal proposals did not positively respond to the rural qualities of the site. The emerging proposals are materially different notably being of a smaller scale, thus reducing impacts on landscape and the road network, and including a mix that reflects social infrastructure needs locally.

### **Community Engagement**

- 3.71 Acknowledging that the site's history attracted community interest, Esquire Developments proactively undertook its own public consultation events during the course of the Local Plan consultation to support the allocation and engage with the local community to explain the Rainham Parkside Village concept.
- 3.72 Due to the school holidays, two events took place at the Oast Community Centre, Rainham on Monday 21 July 2025 and Thursday 31 July 2025. Both events ran from 1pm – 7pm. Leaflets inviting the community were sent to approx. 6,500 residents within the vicinity of the site including Twydall and Rainham. A copy of the boards can be found in **Appendix J**.
- 3.73 Over the course of the two events, approximately 230 people attended the event. And discussed key matters with Esquire and the consultant team. The headline points raised included concerns of highway impacts, lack of infrastructure and loss of the orchards.
- 3.74 Feedback forms are currently being reviewed and the scheme will be shaped by the feedback received.

## **Conclusion**

- 3.75 The proposals for Rainham Parkside Village represent a unique opportunity to secure a high-quality development which respects and responds to its location, delivering significant economic, social and environmental gains, whilst diversifying the local housing market through supporting the ambitions of local SME developers.
- 3.76 As set out above, the emerging proposals have been informed by detailed technical review and input, including reflecting on and responding to the previous appeal decision.
- 3.77 Critically, the emerging proposals are materially different from those previously considered on the Site. The quantum of development is a scale which can come forward in a way which respects and enhances its landscape context and can be accommodated within the surrounding road network.
- 3.78 The allocation of the Site, and subsequent planning applications, will ensure the delivery of a high-quality residential-led SME development supported by appropriate infrastructure provision serving both future and existing communities in the area.
- 3.79 Furthermore, the delivery of a site at this scale will deliver the lost infrastructure that has not been delivered in the area over the last 10 years, even though development sites have generated approximately 1,200 dwellings. The impacts on local services and highways will only get worse unless mitigation and new infrastructure is brought forward. The do something approach is therefore necessary in the area in order to ensure improvement, as opposed to the continuing worsening situation.
- 3.80 The Site is an available, suitable and achievable location for residential-led growth which is supported by both the technical work completed to date and the evidence base of the Plan.
- 3.81 Policy SA10 is therefore justified and effective and contributes towards the Plan being both positively prepared and consistent with national policy.

## **Appendix A**

### Development Framework Document

# Rainham Parkside Village

## An SME Consortium Opportunity

**Lower Rainham, Kent**

Development Framework Document

June 2025

BPTW is an architecture practice focused on transforming not just physical spaces, but people's lives. Our work tells our story.  
We are bold. We are innovative. We care.

Bringing together a wide range of design specialisms, for over 35 years, innovation in urban design, planning, sustainability, and construction technologies has established our reputation as experts in housing, neighbourhood placemaking, and mixed-use regeneration.

From concept to completion, we work collaboratively with our clients, communities, and design teams to create beautiful homes and places.

Rainham Parkside Village - Development Framework Document  
Job no. 24-058  
PBFM-BPTW-XX-XX-DO-A-0601-P20-S3

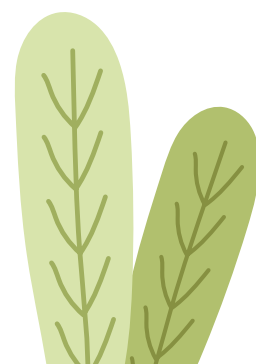
For further information contact: Scott Adams  
Role: Partner, Urban Design // [sadams@bptw.co.uk](mailto:sadams@bptw.co.uk)



# Rainham Parkside Village

## Lower Rainham, Kent

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# 01. Purpose of this Document

This Development Framework Document (DFD) has been prepared on behalf of Esquire Developments Limited to provide an overview of a potential mixed use development site at Rainham Parkside Village ('the Site') located in Lower Rainham.

This Development Framework Document (DFD) has been prepared on behalf of multi award winning SME Housebuilder Esquire Developments Limited to provide an overview of a potential SME consortium residential-led mixed-use development site at Rainham Parkside Village ('the Site') located in Rainham.

The DFD sets out the vision for the site and assesses the suitability of the Site and demonstrates why it is an appropriate Site to be allocated for residential development in the emerging Medway Local Plan 2025 - 2041.

This DFD includes information about the Site including the previous planning history, the current planning context both nationally and locally, relevant technical considerations and the benefits the proposed development could deliver.

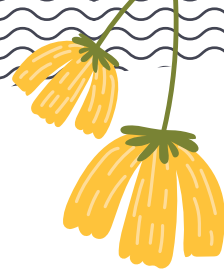
The Site is not just suitable for residential development but also to deliver a range of social, economic and environmental council objectives, including affordable housing, better infrastructure, local employment and community facilities.

This document is produced for illustrative purposes, providing an aide-memoir for interested parties.

The proposals themselves are evolving and will be subject to amendment and refinement as further work is completed. This DFD may be updated accordingly.







51  
Hectares





## 02. About Esquire Developments Limited

Esquire Developments Limited is a multi-award-winning SME developer, based in Longfield, Kent and is focused on the delivery of bespoke high quality homes throughout Kent and the South East of England.

Esquire have forged a reputation for combining innovative design with skilled craftsmanship to provide lifetime family homes. With meticulous attention to detail and superior materials Esquire produce beautifully designed homes that are built to the highest standards, specification and finish.

At the very heart of Esquire's aspirations is the delivery of outstanding quality of life to new homeowners. This is reinforced by a sympathetic understanding of ever-changing modern living standards combined with timeless design and high-quality craftsmanship. Each and every development is designed to enrich its surrounding environment and complement the existing community.

As well as housebuilding, Esquire are heavily active in the local community, working closely with a number of local charities and organisations including sponsoring Longfield Tigers FC U7 and U9 teams, Dartford Valley Rugby Club, Cliffe Woods FC U7's, The Mote Cricket Club Ladies Team and have been the official community sponsor of Ebbsfleet United Football Club. Esquire are also sponsors of the annual Twilight Walk supporting Ellenor Hospice and has recently partnered with Demelza not only undertaking extensive fund raising events but building a purpose built new facility for the charity.

### SME Developers

We are in the midst of a national housing crisis. The increasing complexity, risk and cost associated with the planning system has seen a sharp decline in SME Housebuilders meaning that today, the housing market is dominated by a few volume housebuilders - the eight largest builders build more than 50% of new homes and smaller builders find it difficult to operate.

Statistics have confirmed that in 1988, SME Housebuilders contributed 39% of the total supply of new homes. By 2020, this had dropped to just 10% and has approximately halved since 2007 alone.

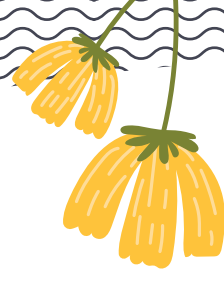
The loss of SME housebuilders has clearly affected the industry's ability to meet its housebuilding targets. The Home Builders Federation calculated that returning to the number of home builders operational in 2007 could help boost housing supply by 25,000 homes per year. Even a return to 2010 levels could help increase output by 11,000 homes per year.



Featherbed Farm



Foxglove



As most SME developers live and work within their community, they also contribute to shaping local communities. The Land Promoters and Developers' Federation said:

*"In recent years, housing development has become focused within a fewer number of larger builders, hence housing design has tended to become more standardised and housing layouts can take a strikingly similar form".*

Whilst the decline of SME's has been recognised by Government, the ongoing changes to the Planning System has not gone far enough to support SME Housebuilders and the ability for SME's to help increase supply. This has in turn stymied growth and created a substantial barrier to SME's - particularly when it comes to Local Plan preparation.

Smaller sites and SME Housebuilders often get marginalised in this process due to the inability to promote land over long periods of time or the land available is either too small for allocation or is located in smaller towns and villages which historically see fewer allocations.

In 2023, the Home Builders Federation wrote to the then prime minister outlining the serious issues facing SME Housebuilders and that the planning system required changes:

*"It is estimated that there are today 85% fewer small home builders than there was a generation ago, but the barriers we experience today threaten to obliterate the contribution to housing supply from our local businesses. A recent poll of more than 200 SME home builders found that 93% were considering scaling back their residential construction activities or changing business direction, therefore cutting investment in the home building sector"*

**SME Housebuilders bring many benefits. We deliver quickly and to a high quality bringing variation in design and materiality. This delivers diversity in the market and offers home purchasers choice of location and style. We also support local employment and our supply chains are also SME businesses themselves.**



Woodlands



Woodlands





## 03. Site Introduction

The Site, known as Rainham Parkside Village, is located to the northeast of Rainham between the railway line and Lower Rainham Road. It extends to approximately 51ha.

The Site comprises 2 agricultural parcels currently in use as commercial fruit orchards. The parcels are separated by Pump Lane, which runs generally from north to south through the Site.

### Rainham Parkside Village

**West:** also known as Pump Farm is approximately 25ha located to the west Pump Lane. It comprises commercial orchards and associated agricultural buildings.

### Rainham Parkside Village

**East:** also known as Bloor Farm is approximately 26ha located to the east of the Pump Lane and extends up to Lower Bloors Lane.

It comprises further commercial orchards and a Bridleway ID GB6A, which crosses the parcel horizontally, connecting Pump Lane with Lower Bloors Lane.

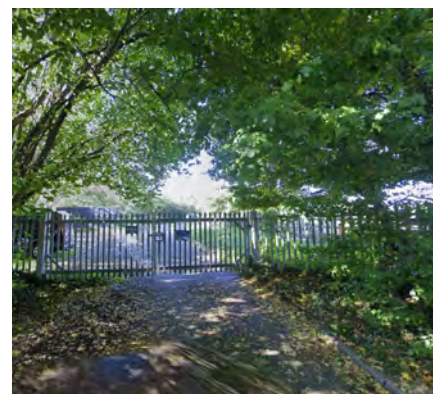
The bridleway is lined with an area of vegetation that bisects the centre of the parcel.

The Site contains a number of farm buildings used for storage and other uses in connection with the commercial orchard. The majority of the Site is planted orchards within limited landscaping in the form of hedges surrounding the site and separating individual parts of the orchard.

The Site is bound to the north-west by further agricultural fields; to the north and north-east partly by houses and the B2004 Lower Rainham Road and beyond this the Medway River Estuary; to the south the railway line acts as a defining boundary but in this area also includes allotments, beyond which is Bloors Lane Community Woodland and to the west near the railway line, is the edge of the residential development in Rainham.



View of Pump Lane from Lower Rainham Road



Access to allotments from Lower Bloors Lane



Mature hedgerows and trees

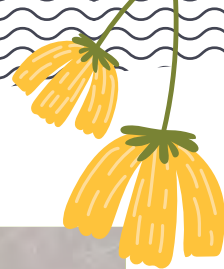


Caption to come



Access to bridleway from Lower Bloors Lane





Pump Lane



Hedgerow opposite orchards



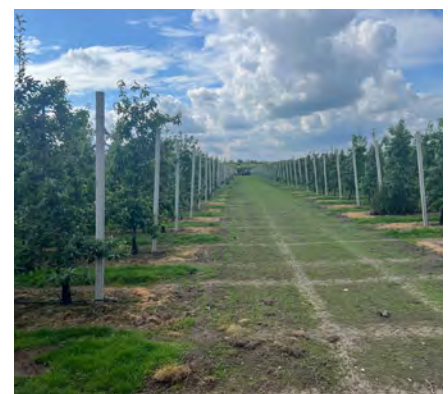
Farmstead development along Pump Lane



Residential building along Russett Farm



Lane between orchards



Commercial orchards





## 04. Previous Appeal

A previous application (ref: MC/19/1566) was refused by Medway Council in June 2020, which was subsequently dismissed at appeal on 03 November 2021 (ref: APP/A2280/W/20/3259868).

### Previous application

A previous application (ref: MC/19/1566) was made in June 2019 for:

"Outline planning application with some matters reserved (appearance, landscaping, layout and scale) for redevelopment of land off Pump Lane to include residential development comprising of approximately 1,250 residential units, a local centre, a village green, a two form entry primary school, a 60 bed extra care facility, an 80 bed care home and associated access (vehicular, pedestrian, cycle)".

The application was refused by Medway Council in June 2020, which was subsequently dismissed at appeal on 03 November 2021 (ref: APP/A2280/W/20/3259868).

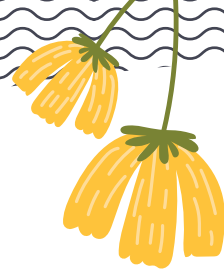
The main considerations that were subject to the Appeal were:

- Character and appearance of the surrounding area, including the Gillingham Riverside Area of Local Importance;
- Significance of heritage assets;
- The availability of best and most versatile agricultural land; and
- The capacity and safety of the local highway network.

The Inspector concluded that the benefits of the proposals outweigh the potential heritage harm. However, the loss of BMV, substantial landscape impact, and impact on the local highway network was not outweighed by the benefits of the scheme, and was therefore dismissed.



Street elevations from the refused planning application - May 2019, PRC.  
Source: Planning Portal



The adjacent plan refers to the previous refused application for the site. Many aspects of the design did not positively respond to the unique, rural qualities of the site. The following aspects will be considered to develop a stronger design response to the site:

- Internal 'loop' road contrasts the linear nature of the farms and development patterns of the area
- Pump Lane's function as a north-south road is removed along its northern length
- Site density is too dense for the context
- Field patterns and hedges removed, losing local rural character
- Village green separate from Village Centre uses

### The emerging approach

The emerging scheme approaches the site in a radically different way. Most notably it is of a substantially smaller scale than the Appeal scheme thus limiting the degree of impacts from before, particularly in regards to landscape and road network.

This scheme is also supported by a greater evidence base, which has identified the past levels of growth in the local area and subsequent impact in Rainham in recent years through ad hoc applications that have come forward.



"Proposed residential development masterplan" - May 2019, PRC. Source: Planning Portal

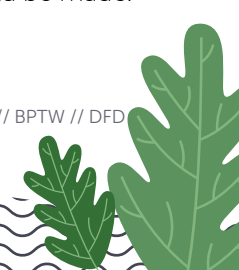
Accordingly, the scheme offers a mix of uses that rectifies some of the deficiencies within the wider infrastructure that have not come forward under any form of comprehensive or plan led development due to these ad hoc sites being too small on their own to deliver such infrastructure.

In addition, the site is designed to be delivered by a conglomerate of SME Housebuilders in order to ensure not only pace of delivery, but also variation in design and of high quality.

The SME Consortium approach fits wholly within the Council's objective of delivering high quality homes at pace, whilst also supporting SME Housebuilders – which in turn supports other associated employment provision within the local area.

Finally the layout is integrated within the site and positively responds to the rural character of the area, celebrating the former farming uses and utilises the local "lane" network.

In short, whilst the previous appeal was dismissed, this scheme is materially different in nature to that Appeal scheme meaning no direct comparisons can or should be made.



# Previous Appeal







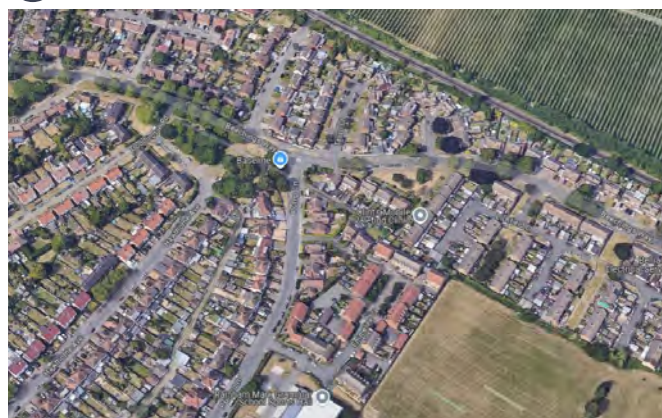
- Historical lane
- — Proposed primary route





1 Suburban development

3 Farmstead development



2 Suburban development currently under construction





## 05. Planning Context

Medway Council is currently in the process of preparing a new Local Plan which will guide development up until 2041.

Medway Council is currently in the process of preparing a new Local Plan which will guide development up until 2041. The Local Development Scheme (LDS, February 2024) indicates that following the publication of the Regulation 18B in July 2024, MC anticipate adoption of the emerging Local Plan in Autumn 2026.

The Local Plan is a key document for Medway to understand the direction and scale of growth and ensure that the supporting infrastructure is also delivered alongside new homes. Unfortunately, Medway last adopted a Plan over 20 years ago in 2003 and has been unable to demonstrate a 5-yr supply of land for longer than that.

Accordingly, there has been a substantial and sustained amount of ad-hoc growth across all of Medway, including Rainham. Unfortunately because of the nature of this growth, it has not been possible to properly plan and deliver the associated infrastructure to mitigate against the impacts. This includes the provision of schools, doctors surgeries, later living, open spaces and community facilities.

Whilst this isn't a specific fault of any one site or the Council, it is a consequence of trying to address housing needs without a Local plan in place.

For Medway, the current standard method proposes a housing requirement of 1,667 dwellings per annum meaning around 26,500 of new homes are to be delivered up to 2041.

The Council has for a long time identified substantial growth on the Hoo Peninsular, which will be the main focus for future development. However, other parts of Medway are required to deliver homes including in Rainham.

This site represents an excellent opportunity to help meet not only the homes needed up to 2041, but also rectify a number of community deficiencies in the area and deliver a unique new village to Rainham.



Dispersed Growth

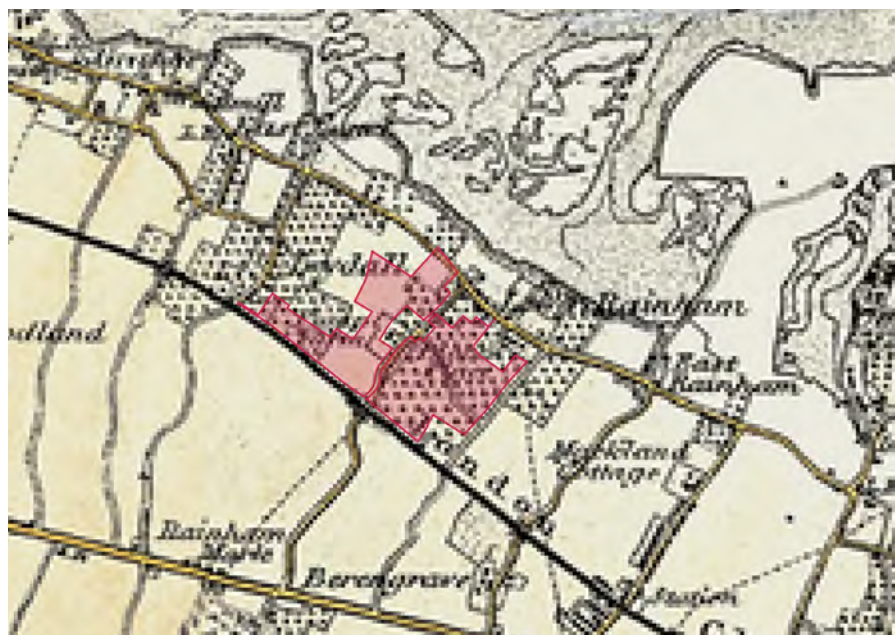
## 06. Settlement History

The north south lanes linking Lower Rainham Road to London Road are a key historical feature within the site context.

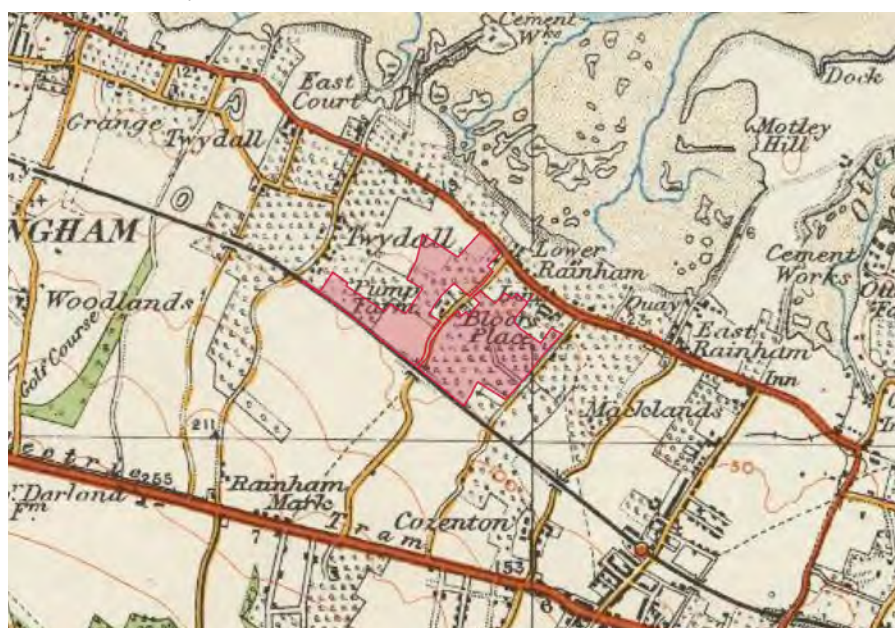
### Historical evolution

The following pages include four historical maps illustrating how the site and its context developed over time:

- 1897: the area included railway line surrounded by agricultural land with limited linear development along streets.
- 1923: the area developed with greater industries including a cement works, quay and a dock appear along the waterfront to the north of Lower Rainham Road. Additional development is located to the south of London Road. Bloor's Wharf (taking the name by the old mansion house to the south) had been used for a number of industrial purposes, including a ship breakers and scrap yard (the Wharf became part of Riverside Country Park in 1997<sup>1</sup>).
- 1946: the map demonstrates further development to the south of the railway line, demonstrating the residential expansion of Rainham.
- 1960: the aerial view shows the fruit orchards within the site and further (suburban) residential development to the south of the railway line.



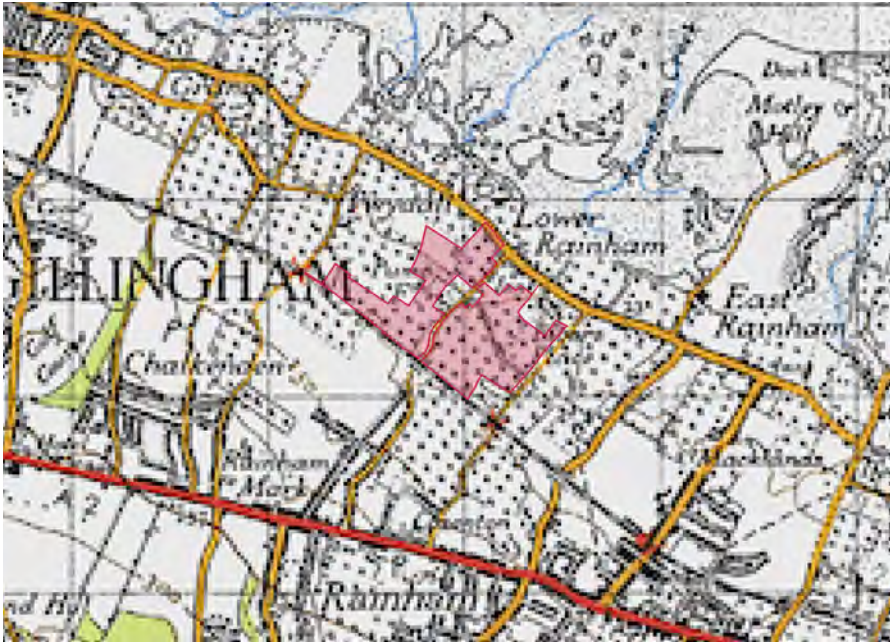
1897 Historical map



1923 Historical map

<sup>1</sup> Information from <http://www.rainham-history.co.uk/>





1946 Historical map



1960 Historical map



Bloor Wharf Historical Images  
([www.shipsnostalgia.com](http://www.shipsnostalgia.com))





## 07. Settlement overview

Today, Rainham is classified as a “District Centre”, along with Strood, Rochester, Gillingham, and Hempstead Valley. Rainham provides essential services, and community uses to support sustainable living.

### The site today

Today, Rainham is classified as a “District Centre”, along with Strood, Rochester, Gillingham, and Hempstead Valley. Rainham provides essential services, and community uses to support sustainable living.

There are a number of existing primary schools within close proximity to the Site. The Rainham Mark Grammar School and The Maritime Academy are located to the south of the Site and provide secondary education. There are several secondary schools located beyond the immediate vicinity of the Site.

Frequent bus services operate along the Lower Rainham Road (routes 131 and 200A) and Beechings Way (routes 101, 116, 130, 182, and 200C) serve the surrounding area, providing good connectivity to Gillingham, Chatham, Hempstead Valley, and Maidstone.

Rainham railway station is located c.1km from the Site and provides

frequent services to London St Pancras, London Victoria, London Blackfriars, Dover, Ramsgate, and Faversham.

To the north of the Site lies the Riverside Country Park and Rainham Community Orchard. To the south of the Site is Bloors Lane Community Woodland and allotments, and to the north east of the Site are the Beechings Playing Fields.

### Heritage and listed buildings

The local area developed along a network of north/south lanes that ran perpendicular towards the estuary, meeting at Lower Rainham Road. A series of farmsteads were set within this network of rural lanes, whilst more linear village-like development formed fronting onto these routes over time. Today we see a rich tapestry of heritage buildings.

Chapel house (fig.1 on this page) was originally a medieval house, now two, built in mid-late 15th Century. It was altered twice, once early-mid 16th Century and once early 20th Century.

Bay Tree Villa (fig.3 on this page) was built around 1820. Key features include flemish bond brick with brick lateral stacks and hipped tiled roof. The building has been listed as an example of a polite small rural house in original condition.

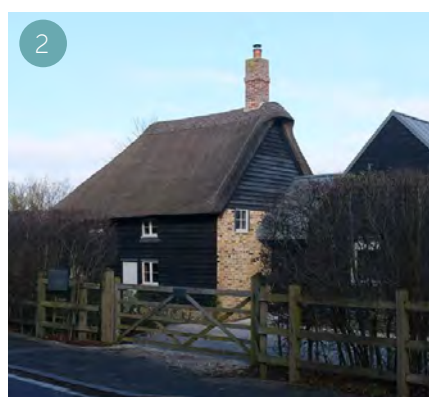
Pump Farmhouse (fig.4 on the opposite page) is at the heart of the site and is a medieval grade II listed farmhouse that was first built around late 18th Century. In early 20th Century, it was re-modelled and extended.

The Old House (fig.6 on the opposite page) dates back to the 15th Century. It is timber-framed with plaster infill, limestone rubble and brick, with a brick ridge stack and tiled hipped roof with right-hand cross wing.

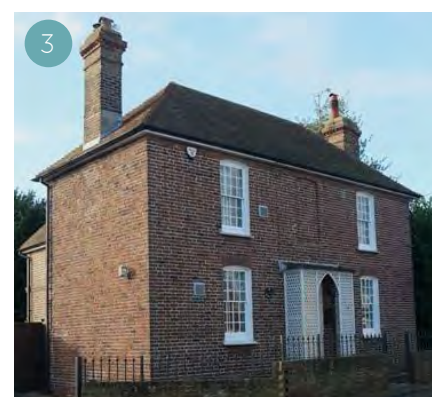
Bloors Place (fig.8 on the opposite page) dates back to approximately 1470-1510, for Christopher Bloor. It consists of a timber-frame, clad in red brick to ground floor and tile-hung above.



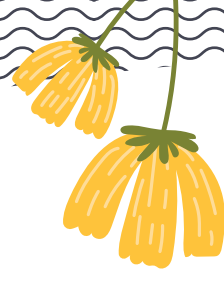
Chapel House (Grade II)



Black House (Grade II)



Bay Tree Villa (Grade II)



Pump Farmhouse (Grade II)



497, 499, and 501, Lower Rainham Road



Location plan



The Old House (Grade II)



Range Of Outbuildings Including Cart Lodge And Granary West Of Bloors Place (Grade II)



Bloors Place (Grade II\*)





## 08. Site Context and Opportunities

The Site sits within a unique rural context related to landscape, flooding, heritage and local movement network.

### Technical considerations

#### Landscape

A Landscape and Visual Appraisal has assessed the emerging development. Based on that assessment it is concluded that development on this site of the kind proposed has only a very limited potential to cause adverse visual impacts and a lowering of the existing visual amenity for most receptors.

Due to the nature of existing vegetation cover along the site boundaries and within the surrounding landscape and the railway line to the north, the site has a very small visual envelope with views of the site being large limited to locations immediately adjacent to the site boundary and from the elevated foot bridge across the railway line and the Bridle Way which cross the site directly.

Overall it is therefore likely that the proposed development would result in a Neutral impact upon Visual Amenity in the Long term at the site scale, and no visual impact at the local scale or beyond. On balance it is therefore concluded that this site and its surrounding landscape has a High capacity to accommodate development of the type and scale proposed. Whilst there would be a permanent and major change to the appearance of the site itself this would be experienced from only a very small number of locations.

The proposed development itself is capable of appearing as a high quality and visually attractive development that would not be considered to be uncharacteristic or out of keeping with the wider landscape context. It is not likely to be considered a visual detractor by the majority of people, and therefore would not result in a long term lowering of the quality and conditions of views nor the overall perceived visual amenity experienced by future receptors.

It is therefore concluded that the site and development could be accommodated into the landscape without causing significant long term adverse effects.

#### Flood Risk

The entirety of the Site is within 'Zone 1' Flood Risk as designated by the Environment Agency. It is therefore an acceptable location for development.

There are some small areas of the Site shown to be a low risk from localised surface water flooding, whilst there are some areas along Pump Lane that are at medium to high risk of surface water flooding. This is not a significant constraint to development and will be taken into account in the final iteration of a layout plan for the Site, with residential development avoiding these areas.

#### Heritage

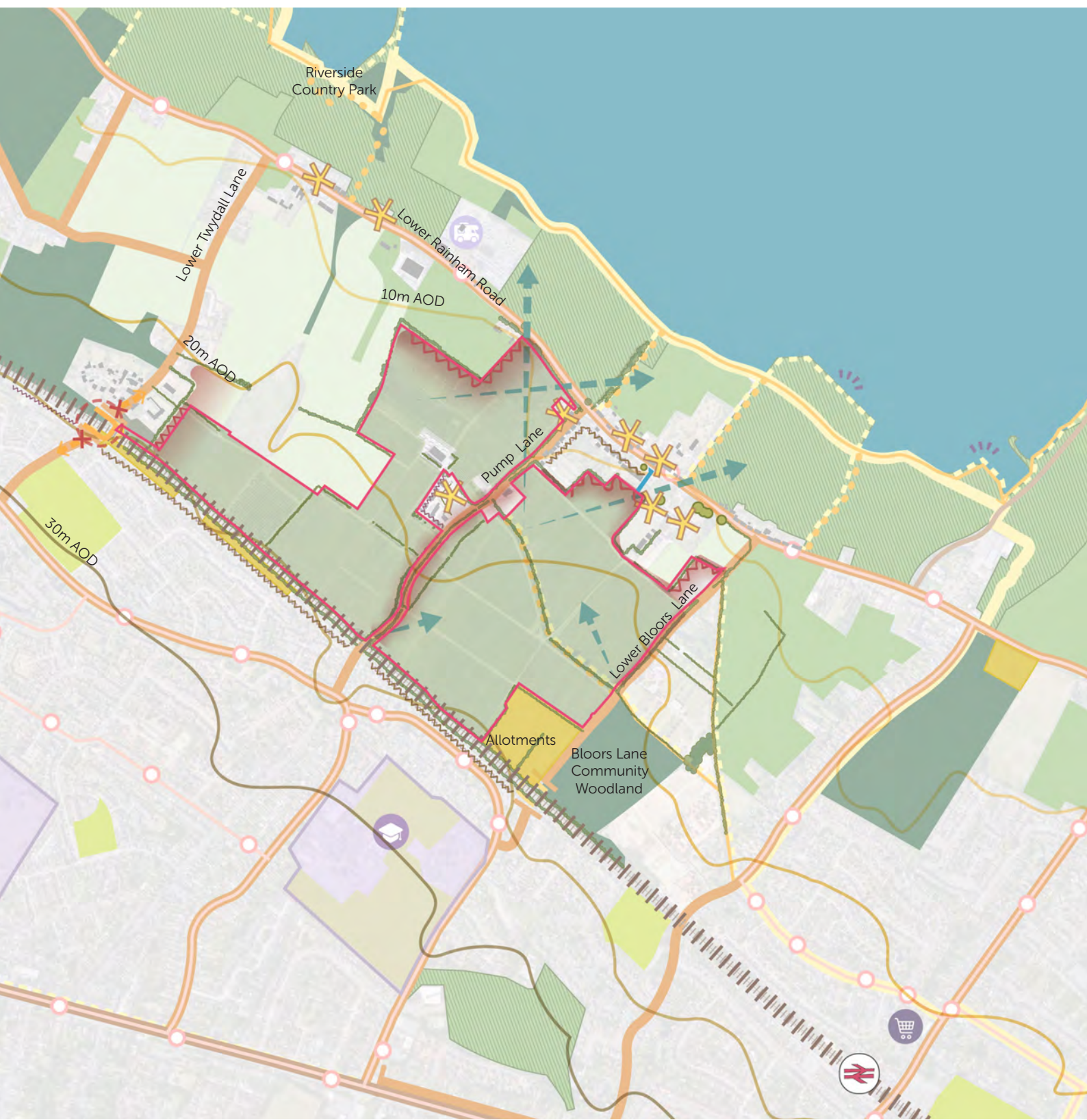
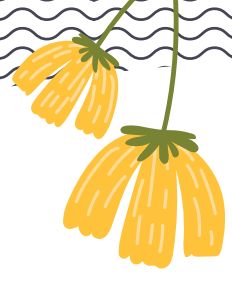
The Pump Farmhouse, a Grade II listed building, is the only listed building located in the centre of the site, with a number of listed buildings within close proximity.

As set out within the Planning Appeal section, the very substantial benefits that would arise from the appeal scheme are considered to outweigh the heritage harm that is identified both individually and collectively.

#### Key

-  Views to be retained
-  TPO
-  Existing trees and hedgerows
-  Back of houses
-  Listed building
-  Existing pedestrian railway crossing currently closed
-  Landscape sensitive areas





Constraints Plan





# Site Context and Opportunities

## BMV

The site is identified as Grade 1 (8ha), Grade 2(40.6ha) and Grade 3a (2.3ha) Best and Most Versatile Land. The NPPF acknowledges this should be protected unless material considerations indicate otherwise. Given the serious shortfall in Medway's Housing needs and that this proposal is seeking to deliver substantial community benefits, it is considered that the benefits outweigh the loss of the BMV value of the land.

## Ecology

The site is an active commercial orchard and accordingly, the ecological interests on the site are largely confined to the margins and hedgerows. The previous ecology work identified the site contained around 26 species of birds recorded (17 species presumed breeding), at least 5 species of foraging/commuting bats, foraging/commuting badger and Slow worm and common lizard present within southern and central boundaries. It is considered that subject to appropriate mitigation strategies to be agreed with KCC Ecological services and the Council, the impacts on the existing ecology on site can be satisfactorily addressed and indeed enhanced. In this regard, the site will seek to achieve at least a 10% increase in Biodiversity Net Gain.

## Highways

A review of the highways proposals put forward as part of the previous Appeal have been assessed to determine the suitability and safety of the access location and the impact on the local road network. It is evident from the review of the 2019 planning application submission, post-submission and Inquiry documents that assessment of the traffic impact of development on this site will need to be based on a MC strategic model such as the Medway Aimsum Model (MAM). Given the approximate 38% reduction in the number of dwellings proposed from that which was applied for in the 2019 application, the reduction in the number of vehicle trips generated by the development is likely to be significant. As a result, the associated impact on the local highway network will also be reduced compared to the 2019 scheme.

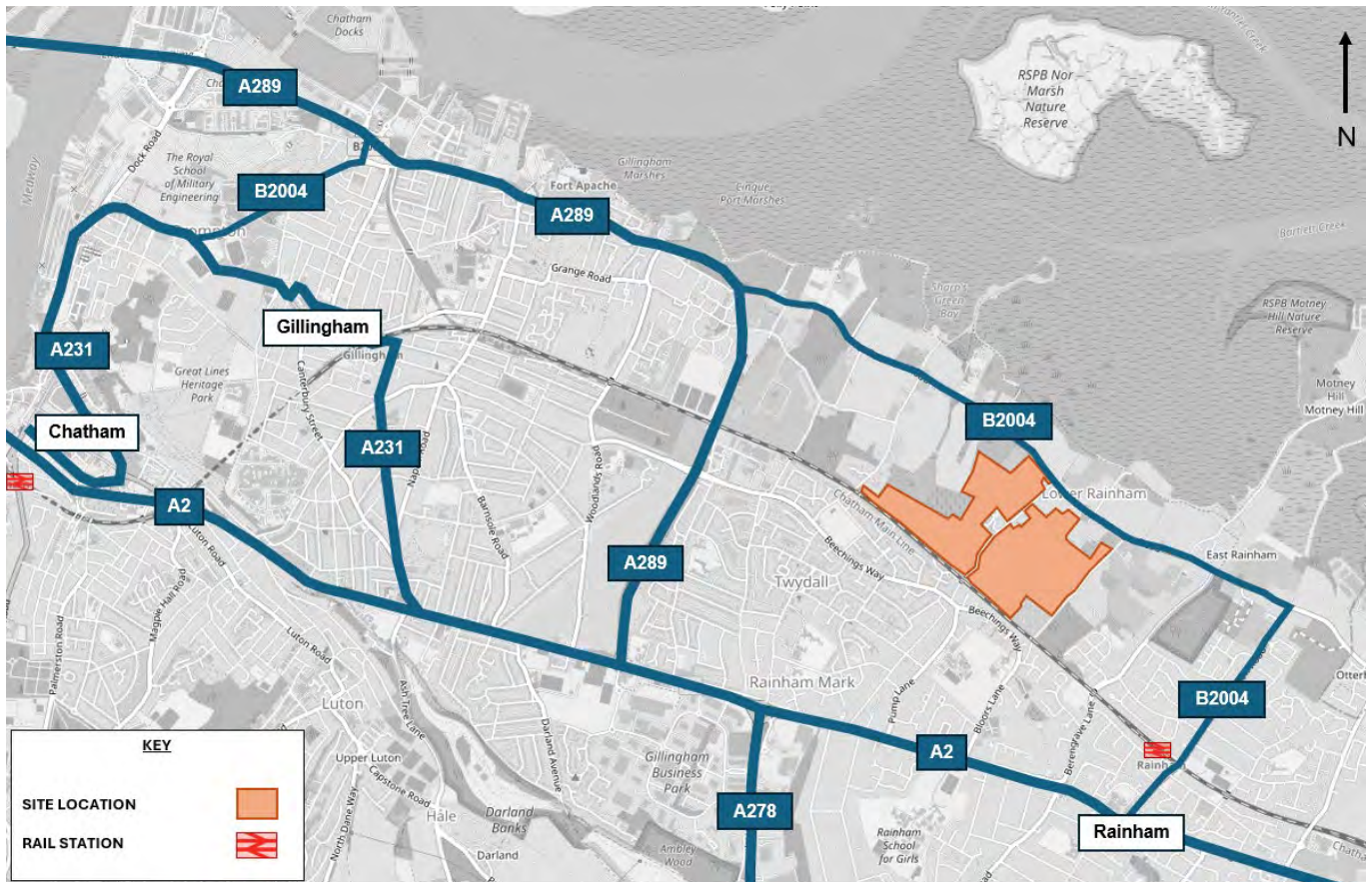
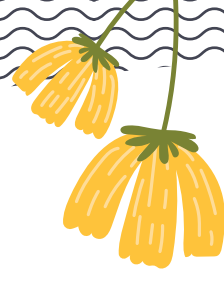
Of notable relevance to determining suitability of the proposed development is MC's position, at the appeal for the previous site application, where they acknowledged that "it could be possible to reduce the impact of the development on the road network so as not to be severe if additional mitigation were to be secured". Given this comment was made based on the previous scheme, and the reduced quantum of development now being proposed, it is considered that development of the site will be feasible.

This is particularly true when taking into account the current development proposed and the focus on encouraging travel by sustainable / active travel modes.

The consultation draft of the NPPF, 31st July 2024, places a particular focus on the vision and validate approach and that a severe impact should only apply if this is met in all tested scenarios. Whilst the changes to the NPPF have not yet been adopted, it provides a focus on how it is expected new developments should be assessed. It would appear therefore that the currently proposed scheme is likely to meet this test.

The site access arrangements proposed for all modes as part of the 2019 planning application submission were accepted by MC. However, in order to maximise the accessibility to and within the site by walking, wheeling, cycling, public transport and shared travel, the internal layout will need to be designed to prioritise movement by these modes over cars. As such, the internal street layouts and active travel routes will be designed to accommodate this, and to provide connections to routes off-site to facilitate access to facilities and destinations in the wider area by sustainable modes. This will involve engagement with both the Landscape and Highways teams at MC during the planning process to agree on suitable arrangements that will help to achieve the vision of having active and sustainable travel at the core of the development.





Site location and local highway network - Local Plan Transport Representations  
Source: © OpenStreetMap contributors with Pell Frischmann annotations

In addition, further engagement and evidence gathering will take place including with Arriva and MC to discuss the details and requirements for the proposals to extend an existing bus service to route through the site, which Arriva have confirmed they are supportive of previously.

A review of existing walking and cycling routes has shown that the site can be easily integrated into the local pedestrian / cycling network offering the opportunity for sustainable travel around the local area.

We will also seek to investigate potential improvements that could be made to existing routes off-site in order to enhance active travel links and connectivity in the area.

It is also evident that the site is located in proximity to multiple existing amenities, including schools, GP surgeries, transport services, shops and leisure facilities including open space / country parks.

The outcomes of this report indicate that development of the site is deliverable, viable and can be achieved in alignment with National (both existing and consultation versions) and Local Policy. Therefore, it is considered that the site is appropriate for allocation in the emerging Medway Local Plan.

The highways impact continues to be assessed and evolves as statutory consultees are engaged and the design evolves.



# Site Context and Opportunities

## Highways Mitigation

To address the previous Appeal concerns relating to highways impacts, an up-to-date highways assessment has been undertaken to determine the level of impact the development will have and what mitigation may be necessary. This has been prepared in conjunction with Medway Council's Highways department to ensure the appropriate junctions and methodology is appropriate.

The assessment analysed 12 junctions in the local area and undertook 3 development scenarios.

**Scenario 1)** a 2024 base line position i.e. how the junctions currently operate:

**Scenario 2)** a future predicted traffic growth scenario to 2041 without any new development: and

**Scenario 3)** a future predicted traffic scenario to 2041 with the proposed development including mitigation:

The modelling identified 4No. junctions that are expected to exceed capacity at 2041 under scenario 2 i.e. without any more new development and just expected traffic growth.

These are:

- Lower Rainham Rd / Yokosuka Way / Gads Hill Roundabout (No.1 on the maps)
- Pump Ln / London Rd (No.5 on the maps)
- Bloors Ln / London Rd (No. 6 on the maps)

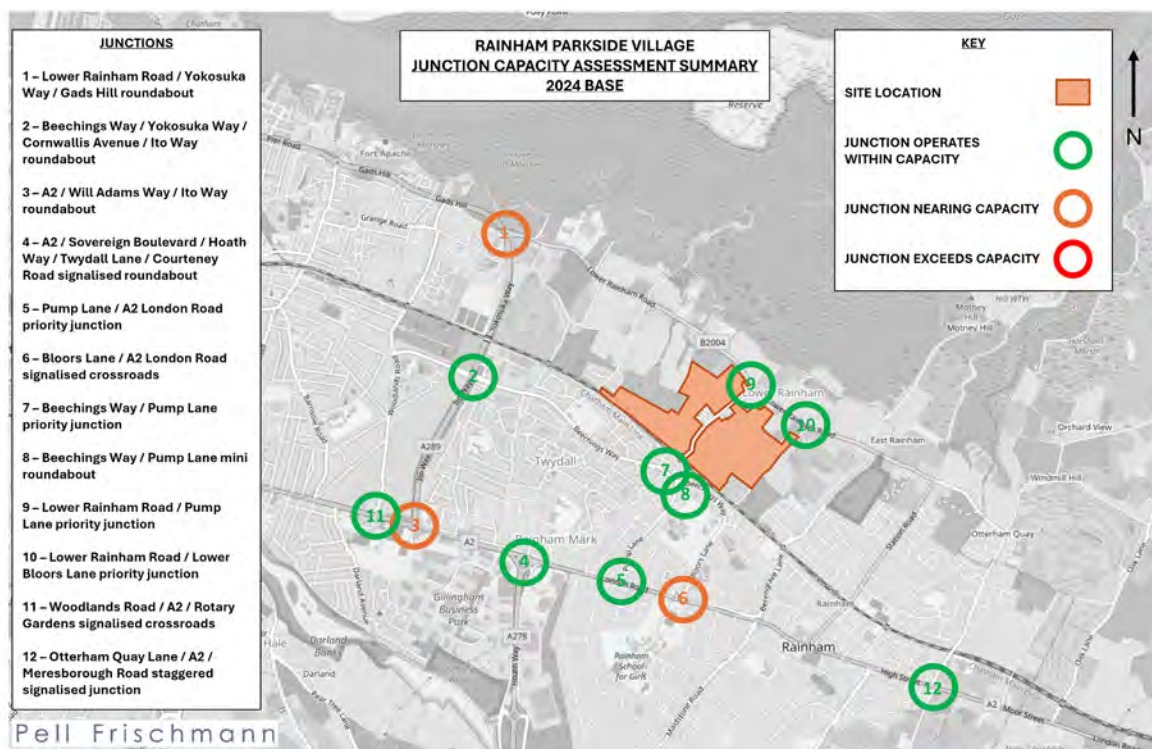
A2/Will Adams Way / Ito Way Roundabout (No. 3 on the maps).

The modelling further shows that by adding the proposed development into the predicted traffic growth and

applying the mitigation measures, it resolves the capacity exceedance of Junctions 1, 5 and 6.

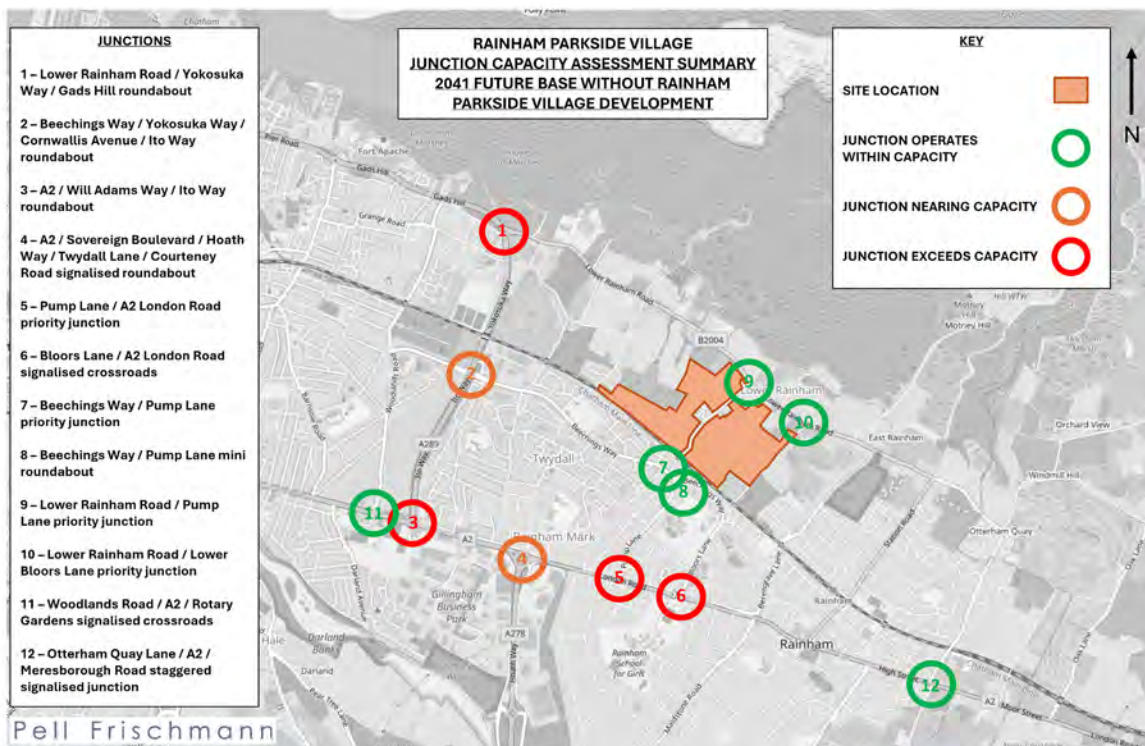
The remaining junction, junction 3 (A2/Will Adams Way) is much more strategic in nature and accordingly requires a more strategic approach to mitigation - whereby we would be expected to pay a contribution based on the schemes impact.

The work to date shows that a 'do something' scenario is better than a 'do nothing' scenario in terms of bringing forward large scale development in this location as without development of any kind, the junction are going to exceed capacity in any event. With the development and the opportunity to fund improvements to the affected junctions, it shows that the highways situation can be improved, not worsened by the development.

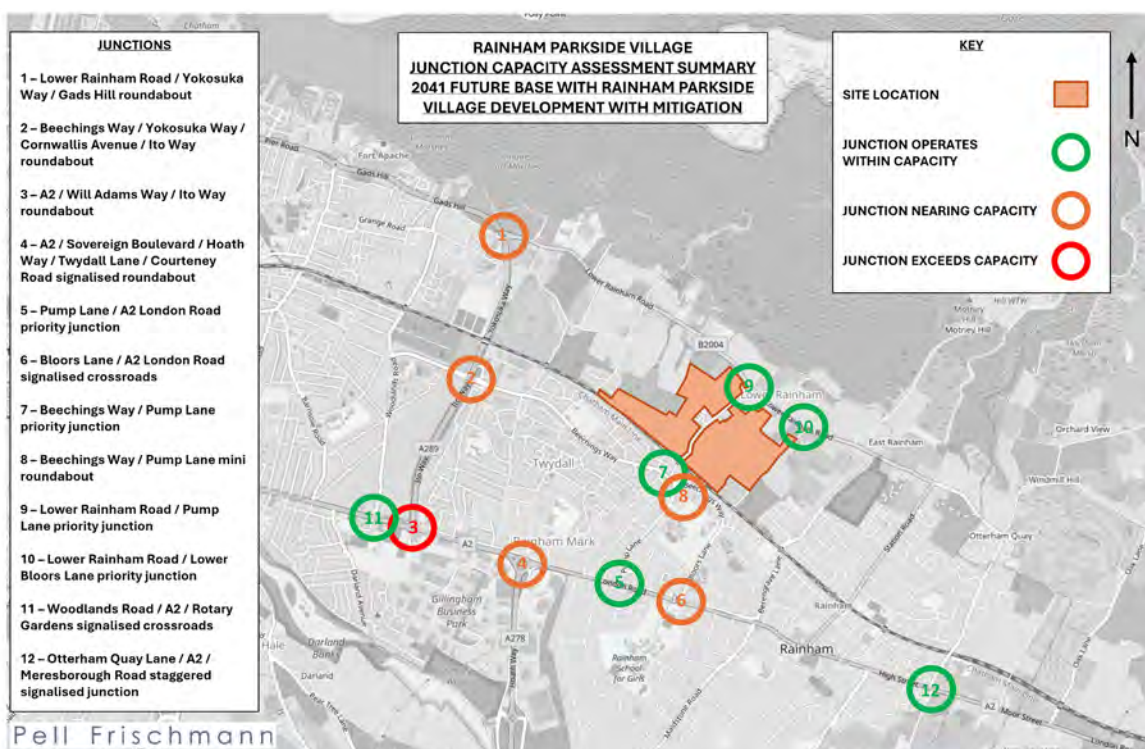


Junction capacity assessment summary - 2024 base





Junction capacity assessment summary - 2041 future base without Rainham Parkside Village development



Junction capacity assessment summary - 2041 future base with Rainham Parkside Village development

# Site Context and Opportunities

The Site can enhance a range of landscape, heritage and movement opportunities to create a local place that celebrates the local rural character.

## Opportunities

### Landscape

- The existing network of open spaces, including hedgerows and trees within the Site can be integrated within the wider green and blue infrastructure strategy.
- There is a gentle change in topography within the Site - with opportunity for proposed SuDs to follow this.
- Opportunity to link to the wider leisure corridor, including the Country Park, Bloors Wharf, Rainham Dock and Eastcount Meadows Park.
- Opportunity to include the existing historic lanes within the proposal.
- Opportunity for including food growing and edible landscape within the Site, linked to its former use.
- Consider views from the Country Park and include trees and landscape screening.












### Heritage

- New homes and buildings to reflect some of the features of the listed and farmstead buildings within the site proximity, such as details, use of materials, typologies or boundary treatments
- Opportunity to include a farmstead approach both for residential and mixed uses.

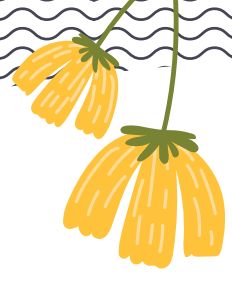
### Movement

- The existing north-south running lanes to be included within the proposal as key active travel routes, connecting key destinations with new homes and linking the wider green infrastructure network.
- Potential for including mobility hubs at key locations and within 400 meter access to all properties. A key mobility hub should be included in proximity of the local centre and school.

### Key

	Red line Site Boundary
	Rainham Railway Station
	Bus Route
	Bus Stops
	National cycleway
	Cycleway
	Public ROW
	Footbridge
	Local park
	Schools
	Local facilities





Opportunities Plan



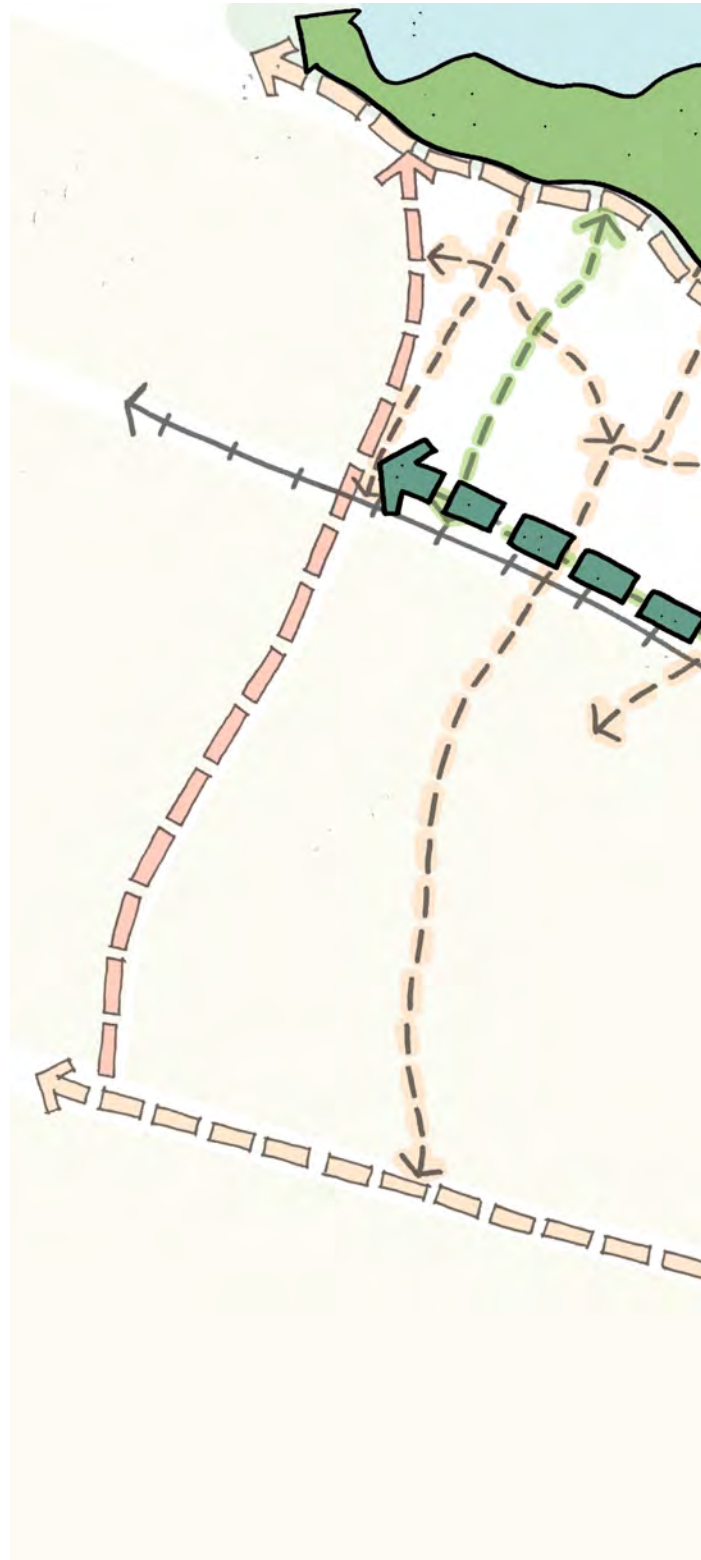
## 09. Concept

The concept for Rainham Parkside Village is to celebrate the rural landscape and create a rich architectural character based on the local vernacular.

The Concept for Rainham Parkside Village is based on the following principles:

- Demonstrating the urban to rural transition by developing a layout that celebrates the rural context, landscape and development patterns and avoids suburban approaches.
- Creating a mosaic of “farmsteads” plots suitable for a range of SME builders.
- Creating a new village heart with non residential uses (including a school, a local centre, a care home) clustered towards Low Rainham Road fronting the central open space and promoting active travel;
- A network of safe and direct routes to the wider leisure corridor to the north and links to the National Trail
- A comprehensive active travel network defined by green corridors following the historic lanes, field lines hedgerows and tree clusters. These will act as connected active travel routes and link the green and blue infrastructure within and outside the site.
- A green buffer will screen the railway line, while also providing a key east west leisure route, with additional landscape buffers introduced in more visually sensitive edges.
- The existing east west pedestrian link will be enhanced, connecting the local centre to new homes and smaller open spaces linking to the wider network of rural lanes

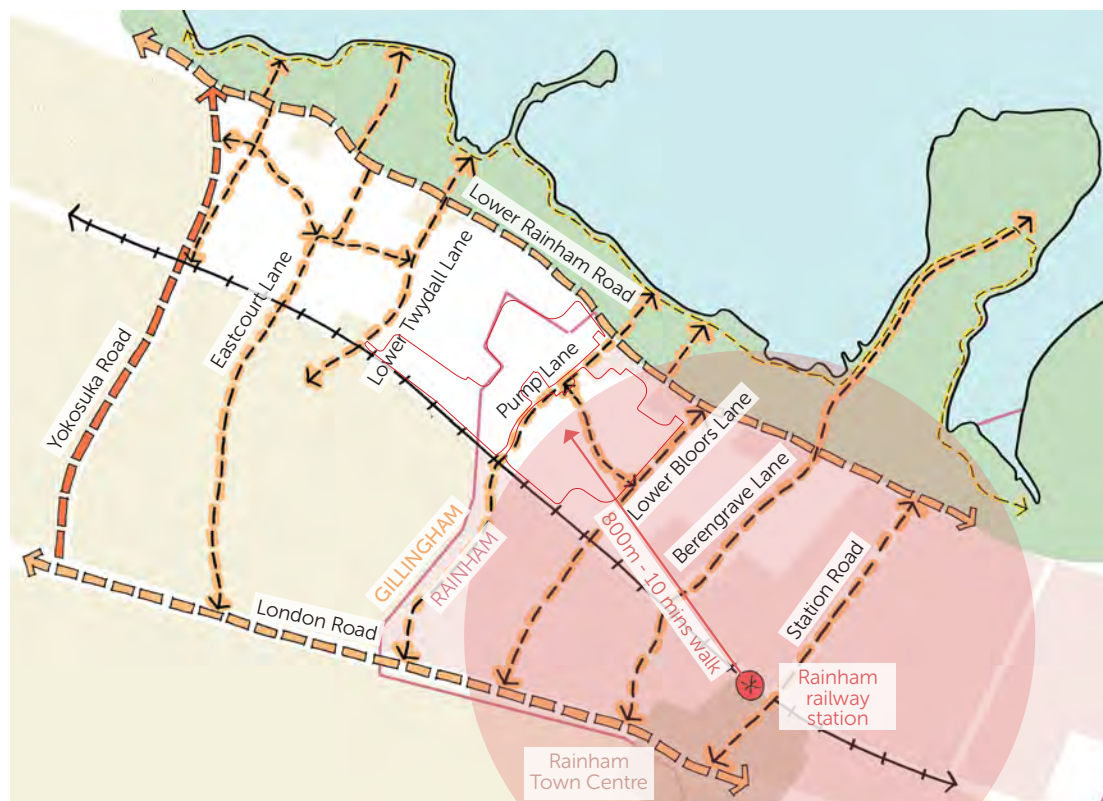
Rainham Parkside Village will integrate the suburban context (to the south of the railway line), the rural agricultural context to the west) and the village character to the east.









## Existing historical lanes and train station accessibility





The site is within an 800m catchment of Rainham Railway Station and adjacent town centre, demonstrating strong wider area connectivity whilst situated within a rural character.

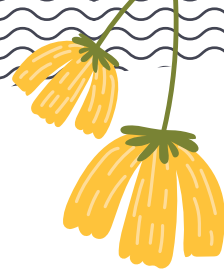
-  Existing historical lanes
-  Boundary between Gillingham and Rainham



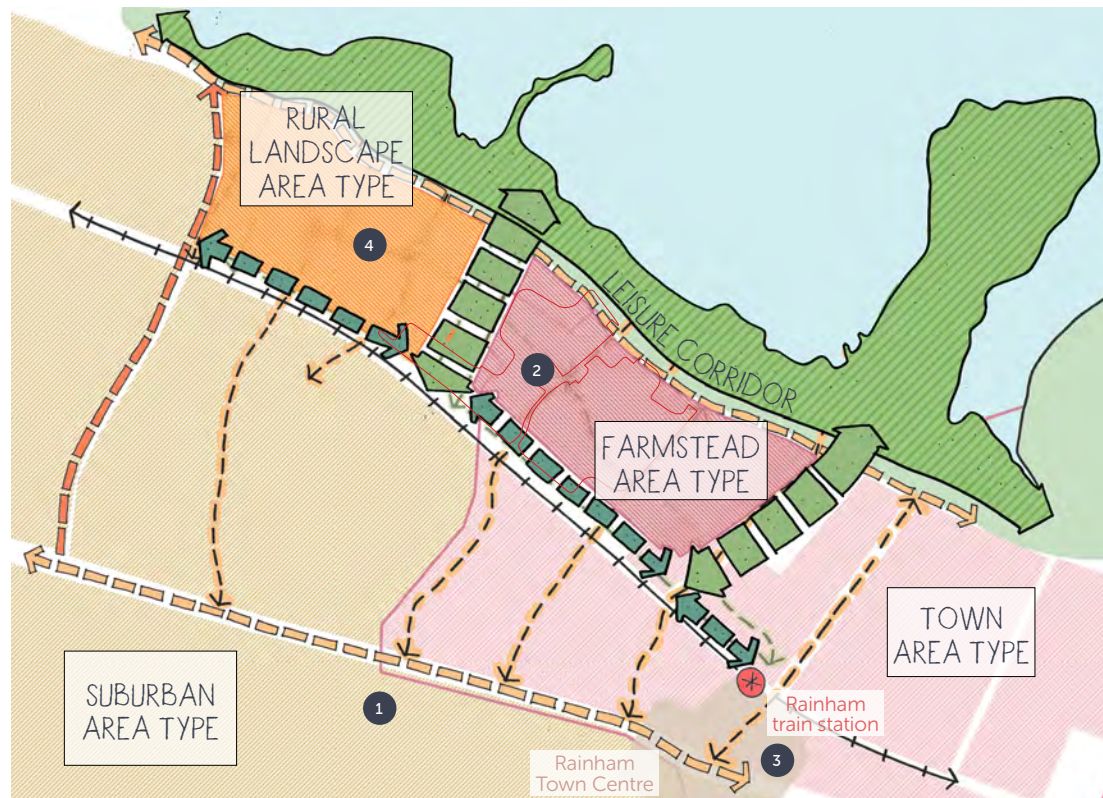
The historic lanes create a network of routes leading towards the River Medway. Introducing missing links and new routes can create a lane network that enhances the historic rural structure.

-  Existing historical lanes
-  Extended lanes





## Emerging Area types



The site area can contribute to the transition between Rainham town centre and its residential neighbourhoods to the rural fringe through the Farmstead Area Type and potential Rural Landscape Area Type.

The Farmstead Area Type will expand on the existing farmstead approach adjacent to the site and celebrate the rural character with clustering of new homes and introduce a new farmstead local centre.



1 Suburban development



2 Farmstead development

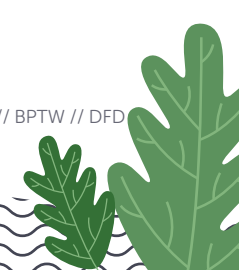


3 Rainham Town Centre



4 Rural development

Beyond, the Rural Landscape Area Type creates additional missing lane links whilst celebrating existing farmland. To the west of the site this will include limited low density farm houses which will follow a strict process as Paragraph 84 Policy to ensure that the existing rural character is maintained.





## 10. Character/ density Studies

A series of character/ density studies provides useful insight to guide site densities and key elements that will contribute to the rural character of the proposal by considering adjacent farmstead and suburban areas.

Density studies aim to highlight rural qualities to be embedded within the future proposal, as opposed to suburban elements.

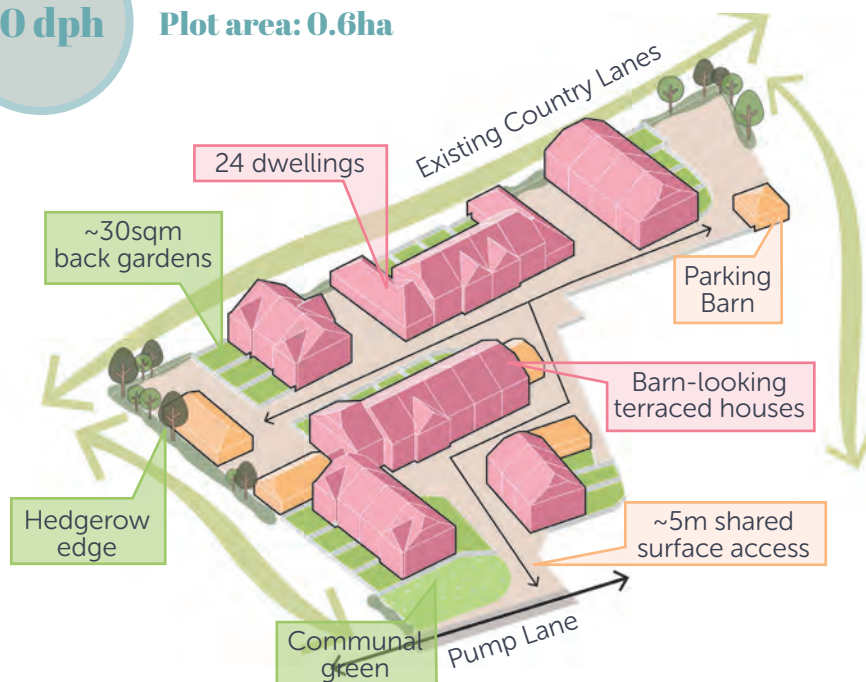


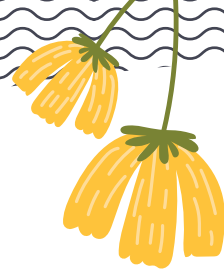
Character and density study key plan

Density  
**40 dph**

Plot area: 0.6ha

### A Farmstead Typology



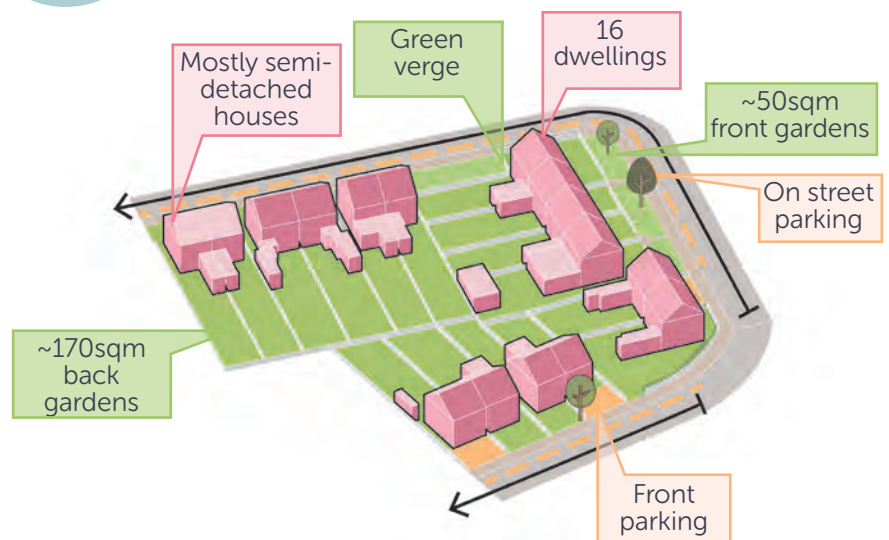


Density

24 dph

Plot area: 0.6ha

**B** Suburban Typology 1

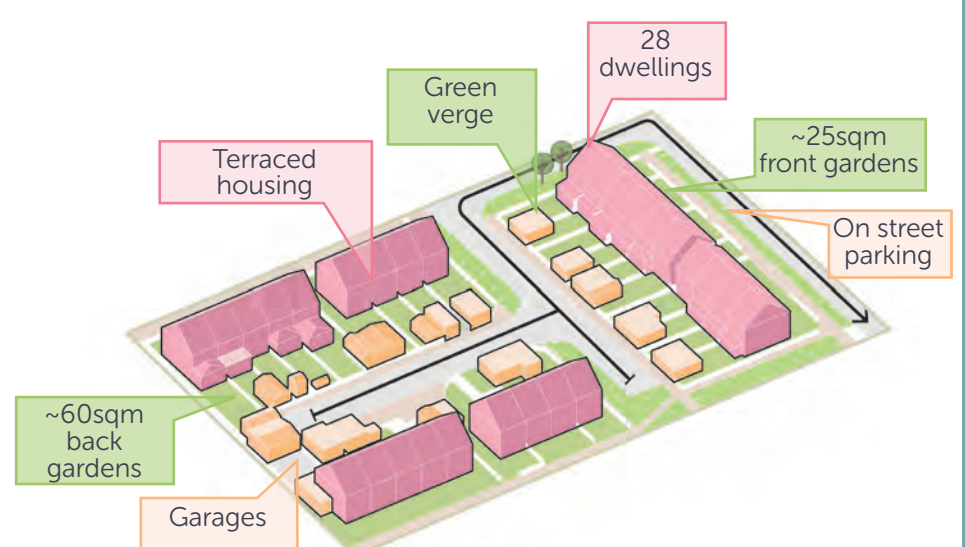


Density

46 dph

Plot area: 0.6ha

**C** Suburban Typology 2







# 11. Proposal

**The proposal for the Site will deliver a series of ‘farm plots’ where a mosaic of contemporary farmsteads will celebrate the rural character and delivered by a range of SME builders**

Our proposal for Rainham Parkside Villages positively responds to the Site-specific constraints and opportunities to deliver a mixed-use development inspired by the rural context. It is rooted in a truly landscape-led design ensuring it appropriately respects the site and its surrounding context whilst making an efficient use of the Site.

The proposed development is designed to come forward through an SME consortium, whereby the Site will be defined by a series of SME plots to speed up the delivery of high-quality homes. The following chart demonstrates the potential for higher delivery rates with greater SME involvement:

No. of SME's	Dwelling output per annum
1	40
2	80
3	120
4	160
5	200
6	240

The layout demonstrates how up to 750 residential dwellings can be successfully delivered on site, including 30% affordable housing, with multiple access points from the Lower Rainham Road, and Pump Lane leading to Beechings Way.

The provision of up to 750 dwellings, including up to 240 affordable homes would make a valuable contribution towards the housing requirement and address the polarisation of the ageing population.

A range of dwelling types are indicatively proposed for the Site, including:

1, 2, 3 and 4 bed houses for affordable housing;

2, 3, 4 and 5 bed houses for private ownership;

Bungalows for later living; and  
Self and Custom built.

The range of dwelling on offer, including bungalows and houses, would provide a new element of choice in the housing market for Rainham.

Alongside the provision of high-quality housing, the illustrative layout demonstrates how the Site would deliver a new local centre, a community building, children's nursery, care home, and circa. 16.2 ha of new public open space throughout the site, providing new recreational opportunities for Rainham.

New green infrastructure is proposed throughout the Site, including new structural planting along boundaries of the Site.

The proposed commercial uses provide for a significant benefit to the local community. The uses address specific and identified shortfalls in the local area and will not only serve the wider community but will inherently improve the sustainability of the location. The illustrative layout demonstrates how a low-density scheme could come forward albeit varying densities which respect the character of the area.

The majority of the Site remains undeveloped with numerous green spaces throughout the Site, including circa 4ha of informal open space to the east and southeast of the Site, providing increased recreational opportunities for Rainham.

Crucially, the development offer the opportunity for north south and east west connections, improving the connectivity between the current urban area of Rainham to the Riverside Country Park.

In addition to the site layout, Esquire Developments is proactively addressing the Climate Change emergency which the Medway Council declared in April 2019. In this respect, Esquire Developments is already adopting energy efficient measures in its building techniques, including air source heat pumps, not installing traditional gas boilers, taking a fabric first approach to the construction methods and supplying all homes with electric vehicle charging points. These measures can reduce carbon reduction by approximately 60% and significantly exceeds current and future building regulations.

Further, our proposal at Rainham Parkside Village is based on 15 minutes neighbourhood principles and aims to encourage a genuine modal shift to active and public transport..





Hazells Farm



Foxglove



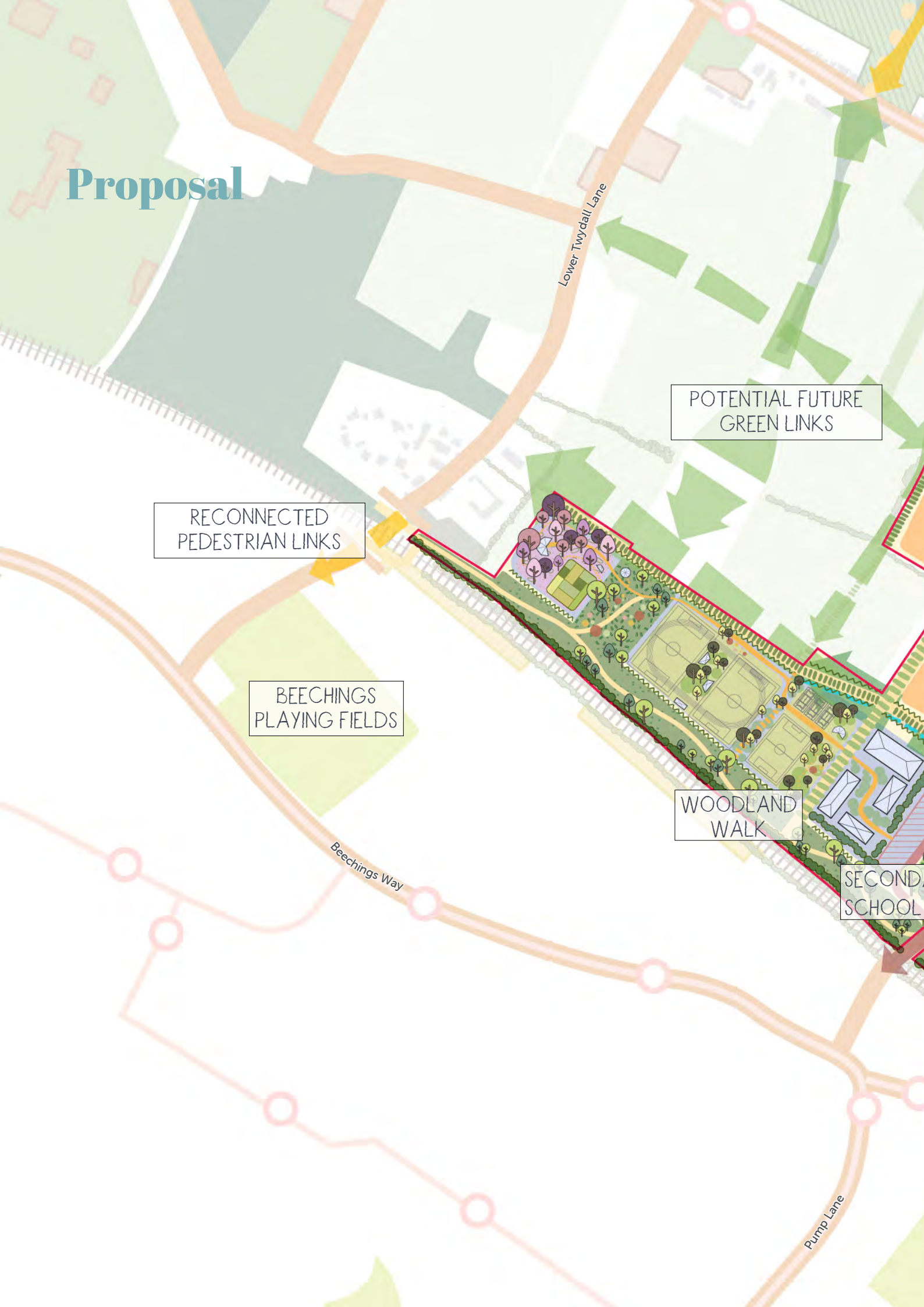
Riverbourne



Riverbourne



# Proposal



RECONNECTED  
PEDESTRIAN LINKS

BEECHINGS  
PLAYING FIELDS

POTENTIAL FUTURE  
GREEN LINKS

WOODLAND  
WALK

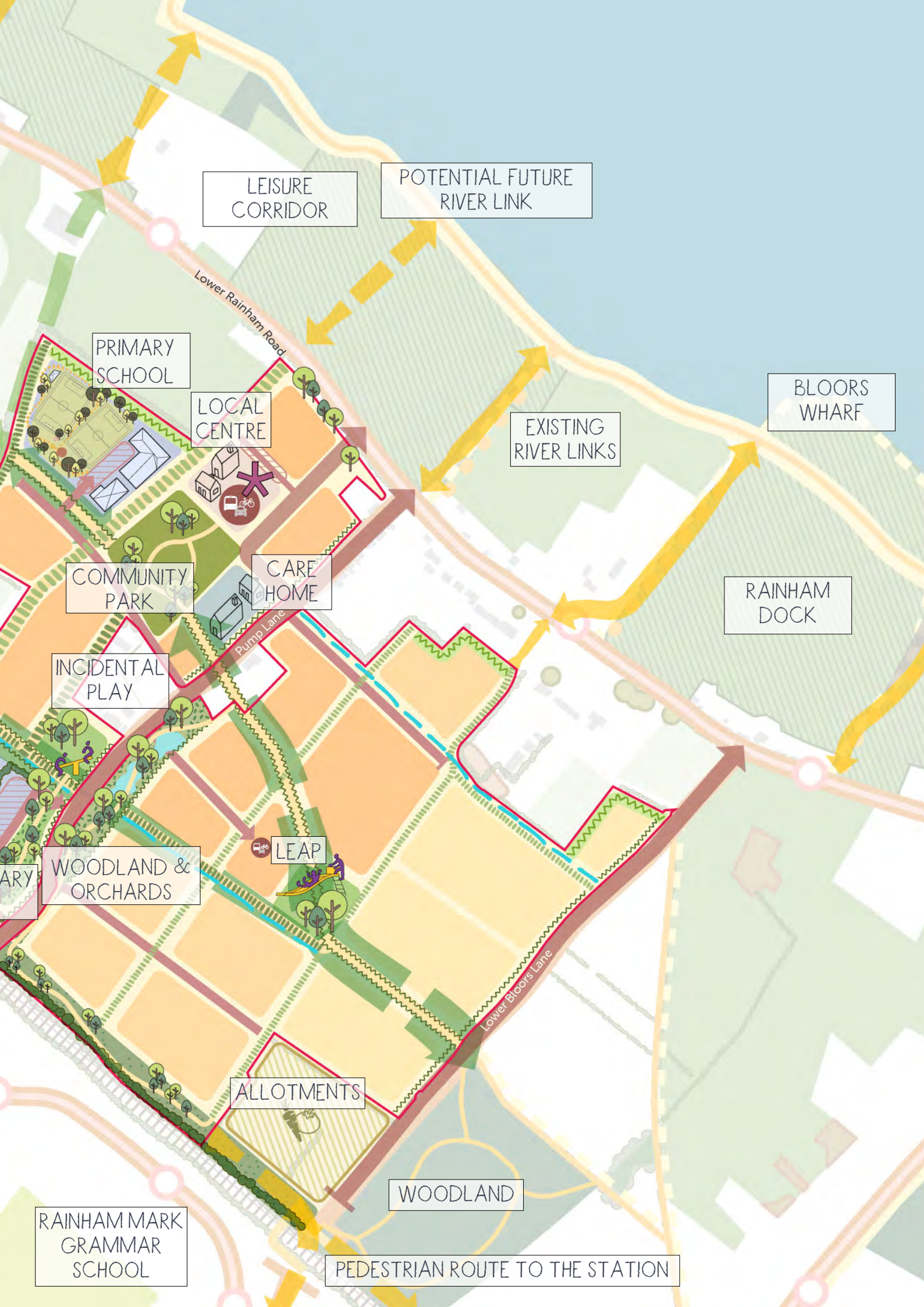
SECOND  
SCHOOL

Lower Twydall Lane

Beechings Way

Pump Lane





LEISURE  
CORRIDOR

POTENTIAL FUTURE  
RIVER LINK

BLOORS  
WHARF

EXISTING  
RIVER LINKS

RAINHAM  
DOCK

WOODLAND

PEDESTRIAN ROUTE TO THE STATION

ALLOTMENTS

WOODLAND &  
ORCHARDS

INCIDENTAL  
PLAY

COMMUNITY  
PARK

LOCAL  
CENTRE

PRIMARY  
SCHOOL

CARE  
HOME

LEAP

Lower Rainham Road

Pump Lane

Lower Bloors Lane

RAINHAM MARK  
GRAMMAR  
SCHOOL



38 // BPTW

# Self build

The Custom and Self Build Act 2015 (amended 2016) places a duty on the Local Authority to provide for sufficient Custom and Self Build plots in the area. However, there are a number of challenges in bringing forward sufficient land, including ensuring the right type, size and location of plots is brought forward to meet the market demand.

The Bacon Review (2021) into scaling up self-build and custom build housing identified a number of constraints to deliver more self-build homes and identified the positive role SME's can play in helping improve the delivery of serviced parcels of land to allow wider market choice for people that wanted to build customised homes.

Esquire Developments have taken this model further, by recognising that demand for custom homes is not always single large detached plots, but also towards the smaller end of the market, providing an opportunity for first time homeowners to secure a parcel of land, build their own home and secure greater equity in the property with a much reduced up front deposit required than a traditional mortgage requirements for a new or second hand home.

This means custom build plots can be more affordable at the start of the process with the upside that once built, the homeowner benefits from a greater amount of embedded equity.



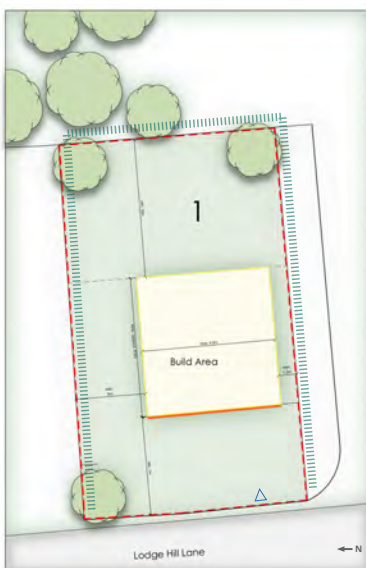
Potential self-build/custom build plot

This site offers the opportunity to deliver a wide range of self-build and custom build plots to meet the local demand and offer a genuine choice of property. Whilst ultimately unsuccessful, our Self Build scheme in Lodge Hill put forward just this model with the opportunity for purchasers to buy a single or double plot depending on their means and desires, all controlled through a design led plot passport.

## Plot passport examples

### Plot 1 FIXED PLOT

Plot Area	425 m <sup>2</sup>
Build Zone	95 m <sup>2</sup>



**Key**

- Plot boundary
- Build area with 11m maximum build height
- Frontage build line\* (built form to not extend forwards of this line)
- Minimum distances
- Boundary hedge/row (the owner of this plot is responsible for upkeep)
- Plot access

\* (The frontage build line is 2.5m from the extended southern boundary of the neighbouring plots.)

The built proposals including garages must fit within the area and height limits set out for this plot.

Adequate parking, either as garage or designated spaces, must be provided in line with the Local Authority requirements.

Sufficient space must be left on site for a contractor site compound.

A material storage area and site cabin facilities must be provided on site. This must be located within the site boundary but may be located forward of the frontage building line.

### Double Width Plot FLEXIBLE PLOT ZONE

Plot Area	645 m <sup>2</sup>
Build Zone	307 m <sup>2</sup>



**Key**

- Plot boundary
- Build area with 11m maximum build height
- Frontage build line\* (built form to not extend forwards of this line)
- Minimum distances
- Boundary hedge/row (the owner of this plot is responsible for upkeep)

\* (The frontage build line is 2.5m from the southern boundary to follow the possible frontage of neighbouring plots.)

The built proposals including garages must fit within the area and height limits set out for this plot.

Adequate parking, either as garage or designated spaces, must be provided in line with the Local Authority requirements.

Sufficient space must be left on site for a contractor site compound.

A material storage area and site cabin facilities must be provided on site. This must be located within the site boundary but may be located forward of the frontage building line.

# School guidance and precedents

## Guidance

### Example School Site Areas

- 6.77ha = Secondary School – 6 Form of Entry (Years 7- 11/900 places)
- 8.66ha = Secondary School – 8 Form of Entry (Years 7- 11/1200 places)
- 8.35ha = Secondary School – 6 Form of Entry (Years 7- 11/900 places) + 250-place Sixth Form
- **8ha= Secondary School – 6 Form of Entry (Years 7- 11/851 places) + 250-place Sixth Form**

### Pitch Size

- Football: Youth U17/U18 – Length 106.07m x width 69.49m
- 3 Court MUGA: 55.5m x 37m

Net site area (playing field area) should be about 80%-90% of the total site area

8ha site = 6.4ha (80%) – 7.2ha (90%)

Net site area for 6 form of entry secondary school+6th form (1100 spaces)

- **Soft outdoor PE Min: 4.4ha Max: 4.8ha**  
**Football pitches**
- **Hard outdoor PE Min: 0.2ha Max: 0.3ha**  
**MUGA**

### Building Area (incl. access and parking)

Non-net site area supports functioning of site (eg footprint of buildings, access areas, paths, roads, parking) =10%-20% of Site

**8ha site = 0.8ha (10%) – 1.2ha (20%)**

## Precedents

### Leigh Academy (Rainham):

- Site area: ~4.57ha
- Max 900pp Yr 7 to 11
- Max 250pp Yr 12-13

### Maritime Academy (Rochester):

- Site area: 5.9ha
- Max 900pp Yr 7 to 11
- Max 250pp Yr 12-13



Leigh Academy (Rainham)



Maritime Academy (Rochester)

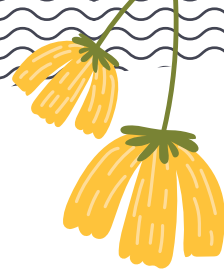
### Hundred of Hoo school

- Primary section to be separate from the secondary
- Demarcation between them for safeguarding etc.
- Separate playgrounds and fields
- Separate accesses as well as pick up and drop off arrangements



Hundred of Hoo





## Jack Hunt Forest School, Peterborough

- Forest School for students aged 11 to 16
- Extension to existing school facilities
- Utilises strip of land adjacent to new sports facilities
- Extensive improvements in planting
- Covered spaces throughout the forest school to shelter from the weather



## Jack Hunt Forest School

Concept design for the site layout





### West Hendon Playing Fields Design Competition

- Transforming playing fields into an exemplary destination park
- Overarching themes were climate change resilience, health and wellbeing, inclusive and accessible and biodiversity.
- Primarily sporting facilities but also offers a wider range of park functions to improve community integration.



### Outdoor Fitness Equipment

- Better integration with rural context through natural wooden appearance.
- Alternative play provision to playgrounds for more senior members of the community



# School layout strategy



- |   |                            |    |                   |    |                 |
|---|----------------------------|----|-------------------|----|-----------------|
| 1 | Drop off                   | 6  | Community Park    | 11 | Playing Fields  |
| 2 | Cycle and pedestrian route | 7  | Incidental Play   | 12 | Community Green |
| 3 | Staff parking              | 8  | LEAP              | 13 | Forest School   |
| 4 | Playing Fields             | 9  | Woodland orchards |    |                 |
| 5 | Local centre               | 10 | Drop off Parking  |    |                 |



# School layout design features



## School Surrounding Context Key Design Features

- Two schools are well connected by planted pedestrian routes linking key green spaces
- Greater integration between school and its rural context
- Forest school and allotments can all contribute towards productive community food growing



## 2FE Primary School Key Design Features

- Farmstead style blocks as school buildings
- School fronting local centre and community green
- Location of primary school, local centre and retirement home frames the community park
- Located along East to West connecting route to LEAP
- Planted buffer future proofs school from connections to the wider context outside of site boundary
- Drop off location separate from school to foster safer walking street conditions for pupil

### Precedents



Outdoor Play



Playing Fields



Route from Drop-off to School



Community Green

## 6FE Secondary School Key Design Features

- Farmstead style blocks as school buildings
- School framed by green strip along the railway, woodland/ orchards and incidental play green
- Drop off and parking separated from school to foster a safer school environment for pupil
- Sectioned to allow for playing fields to be partly fenced and partly open to the community
- Playing fields placed to future proof potential future connecting routes from north to south
- Potential to share playing fields with Rainham Mark Grammar School, located at the south of the site

### Precedents



Forest School



Allotments



Outdoor Gym/ Play



Community Green



Playing Fields









Woodland & Orchards

# Street Types

The proposed street network is based on the existing structure of the established north-south lanes:

- Pump Lane is the primary vehicular street connecting Lower Rainham Road to Beechings Way, which will be enhanced to support and service the majority of the new neighbourhood. A northern route adjacent to the local centre has been introduced to provide a relief to the northern section of Pump Lane, to introduce a short segment of Pump Lane that acts as a one-way route fronting existing buildings and enhancing the listed building where Pump Lane meets Lower Rainham Road.
- A series of lower order 'Field Streets', which reference the former field lines, will provide vehicular connections across the Site. Each field street runs perpendicular to the north/south lanes.
- Lower Bloors Lane and Lower Twydall Lane provide local access to the eastern and western lower density plots, respectively. Opportunity to widen these routes could be explored in more detailed design work.

In order to promote more sustainable and active travel, mobility hubs will be provided at key locations, within a short distance from every home.

-  Primary Streets
-  Retained Lanes (Widened if required)
-  One way Pump Lane (Enhanced setting for listed building)
-  Low order "Field Streets"
-  Cross Streets could Stagger
-  Mobility Hubs - illustrative location

FOREST SCHOOL  
& ALLOTMENTS

NEIGHBOURHOOD  
PARK

SCHOOL

WOODLAND  
WALK

Beechings Way



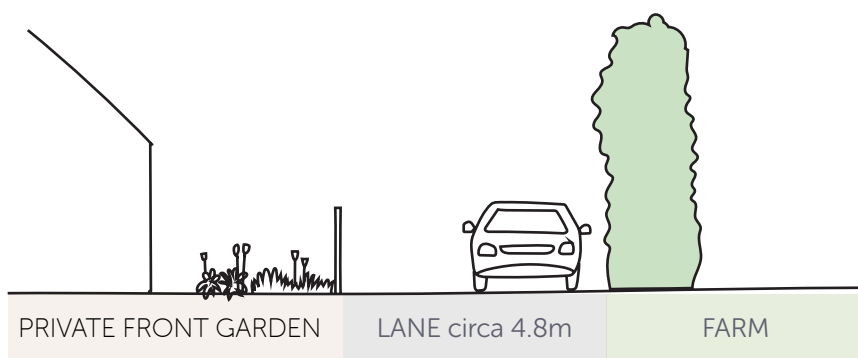
DESIGN PUMP LANE AS  
20 MPH ROUTE BETWEEN  
RAILWAY LINE AND  
LOWER RAINHAM ROAD



# Pump Lane existing street sections

Pump Lane is currently lined by tall hedgerows on both side of the street, or fronting homes, giving a strong rural character to the lane. However, the route is very narrow and gives no dedicated space for walking or cycling.

The northern portion of the lane has existing homes and listed buildings fronting both sides of the lane, and therefore the width of the street cannot be widened. In other areas, the site offers opportunity to widen the lane on at least one side of the lane.



• Rural Character



- Too narrow for two cars
- No dedicated pedestrian space

Match image to come

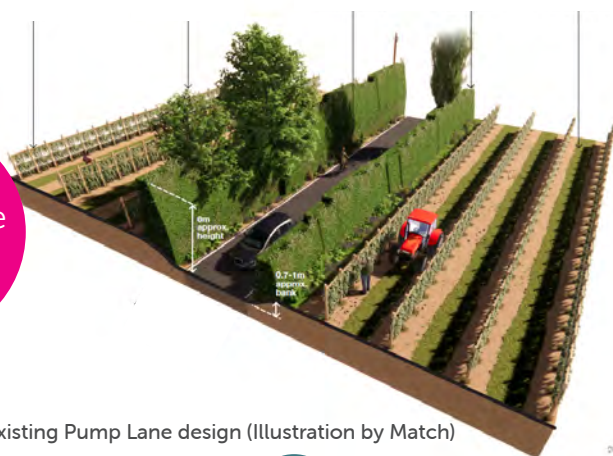


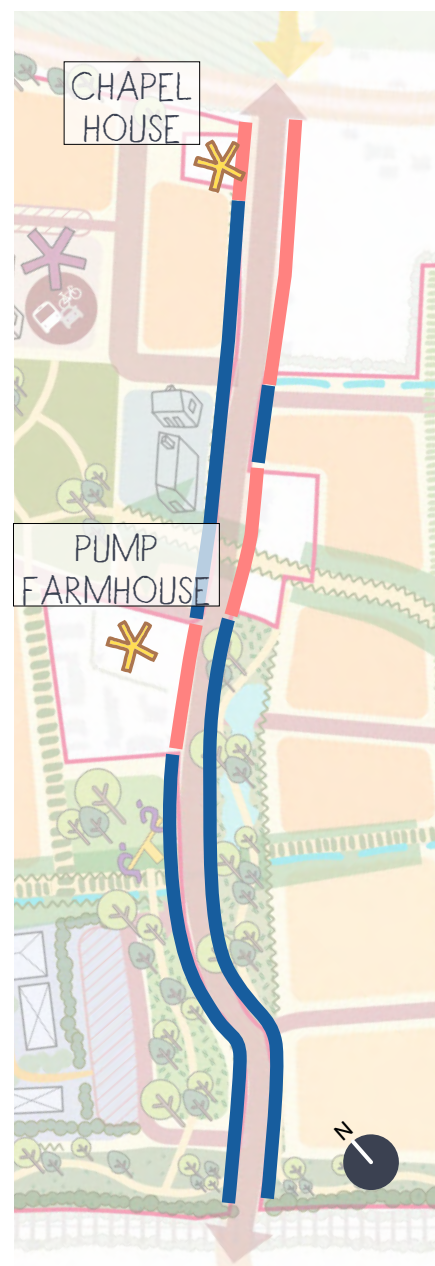
Illustration of existing Pump Lane design (Illustration by Match)



• Rural Character



- Too narrow for two cars
- No dedicated pedestrian space



Listed buildings



Areas within the site with no existing buildings/structures fronting the street



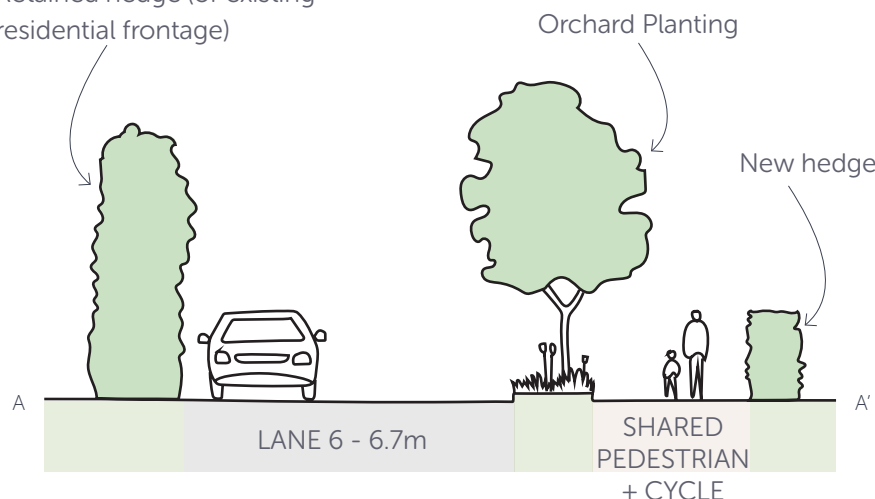
Areas outside the site with existing buildings/structures fronting the street



# Pump Lane proposed street sections

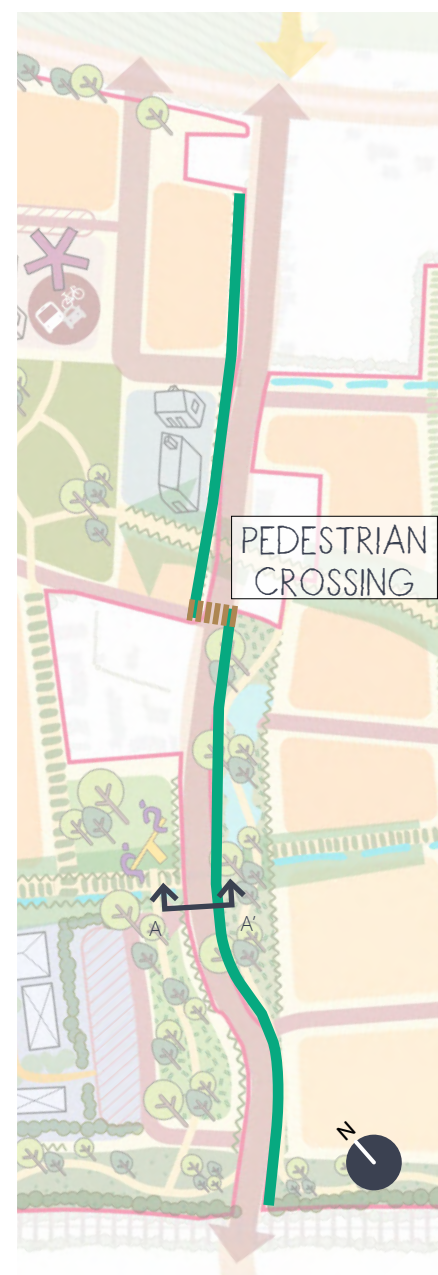
In order for Pump Lane to continue to remain the primary lane for the new community, the carriageway width needs to widen to allow for two vehicles to pass one another, including future potential buses. This means the 4.8m width needs to widen to up to 6.7m wide, whilst an introduction of a shared walking and cycling path will promote active travel, which will continue in front of the listed building at the junction with Lower Rainham Road.

Retained hedge (or existing residential frontage)



The rural character of the lane will be maintained with retained hedgerows, introduction of new hedgerow planting, a planted verge that integrates landscaping that references the rural farmsteads and retained open space in certain areas along the length of the lane.

A central zebra crossing can link the eastern and western shared pedestrian/ cycle routes, and informal crossing will enable tertiary crossing points along the length of an enhanced Pump Lane.



Match image to come

Illustration of proposed Pump Lane design (Illustration by Match)



# Active Travel Routes

The new neighbourhood will be designed as a safe, connected grid of dedicated and shared walking and wheeling routes, creating a place that promotes health and wellbeing and genuine connection with nature.

The proposed active travel network retains existing public rights of way, and creates green corridors framed with hedgerows and trees that culminate in key local destinations such as community open spaces, proposed primary school and central local centre with a range of local mixed uses.

Routes within plots have been identified to prioritise active modes of travel, particularly for shorter journeys. To encourage active travel, each farmstead plot will have multiple connections to the north, south, east and west, encouraging the community to walk or wheel within the neighbourhood or within the wider context.

The green routes within the site will reinforce wider area connections towards Bloors Wharf and Riverside Country Park to the north; active travel links to the south across the railway line; and convenient connections to the amenities and railway station in Rainham.



Match image to come



Illustration of proposed dedicated active travel route (Illustration by Match)

- 1 Dedicated Active Travel Route
- 2 Hedgerows providing ecological connectivity
- 3 Opportunity for impromptu fruit picking
- 4 Shared pedestrian and cycle route
- 5 Views to locally significant elements
- 6 Shared surface access lane prioritising pedestrians
- 7 An active and safe pedestrian link with natural overlooking.





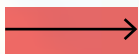
Off Site Existing link



Dedicated Active Travel Routes



Potential Future Active Travel Route



Shared Active Travel Route (Pavement or Shared Surface)



Traditional Lane with single-sided shared pedestrian and cycle path



School drop off route



Potential for enhanced active travel link



Mobility Hubs - illustrative location

SCHOOL

LOCAL CENTRE

SIGNAL

COMMUNITY PARK

CARE HOME

INCIDENTAL PLAY

LEAP

ALLOTMENTS

WOODLAND

SIGNAL



# Landscape Strategy

A landscape-led strategy responds to the site's setting within the Gillingham Riverside Area of Local Landscape Importance (ALLI), shaping proposals that strengthen green connections and reflect local character.

The plan maximises sustainable transport links to key green spaces, enhances conservation area settings, and softens wider landscape views through carefully designed green infrastructure.

New pedestrian and cycle routes will connect rail crossings to Riverside Country Park via ecologically rich, attractive green spaces.

Development parcels follow existing field patterns to support biodiversity, maintain rural scale, and preserve short-range views.

Open spaces and housing will reflect ALLI character and enhance the setting of Chapel House, nearby conservation areas, oast houses, and Pump Lane.



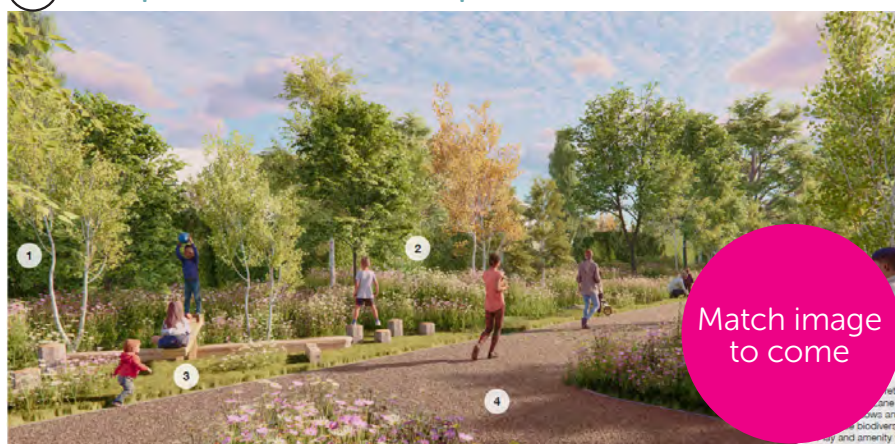
## 1 Woodland Walk Landscape Character Area



Woodland Walk Vision Render (Render by Match)

The woodland walk along the southwest boundary links Twydall and Rainham residents to open spaces, connecting key local points via meandering paths through meadows and native woodland. Tree density varies to preserve views and soften housing. The route features natural footpaths, seating, play areas, and integrated sustainable drainage and habitats like wet woodland.

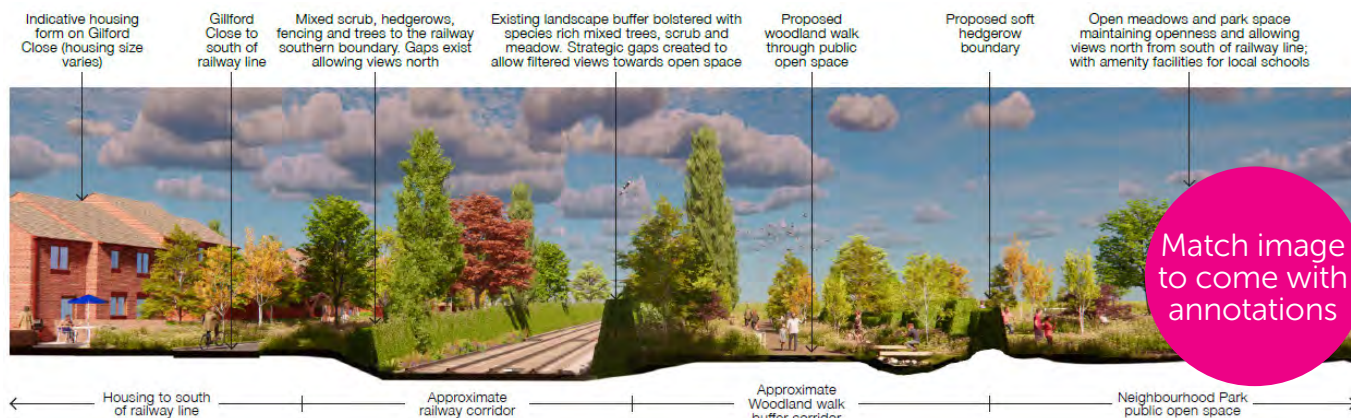
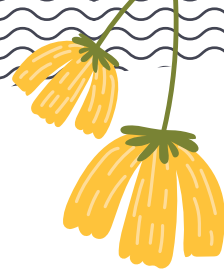
## 2 Pump Lane Park Landscape Character



Pump Lane Park Vision Render (Render by Match)

A new public park along Pump Lane will feature pedestrian and cycle links with raised crossings to prioritise active travel within the local area. Trees, meadows, native scrub, and enhanced hedgerows will create a natural, biodiverse landscape that softens the lane's edge. Sustainable drainage areas will manage rainwater, and play spaces and informal amenities will support social and active lifestyles of current and future residents.





Match image to come with annotations

Woodland Walk North Cross Section (Section by Match)

### 3 Countryside Links and Lanes Landscape Character



Countryside Lanes Vision Render (Render by Match)

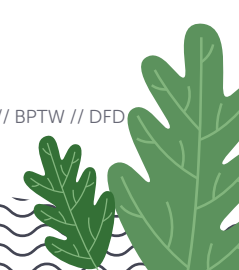
Rainham Parkside Village will feature rural-style streets and spaces that connect people to the surrounding landscape. Pedestrian and cycle links, similar to those in Pump Lane Park, will include naturalistic planting with edible species, meadows, informal seating, and hedgerows to support wildlife movement. Where relevant, routes will align with local landmarks like the Lower Rainham Oast houses.

### 4 Orchard Gardens Landscape Character



Orchard Gardens Vision Render (Render by Match)

Orchard Gardens is a key public space within the wider green infrastructure network, located at the junction of several green links to encourage community engagement with the landscape. Reflecting the area's semi-wild, rural character, it will include a play area, community allotment, public orchard, and meadow for informal activities. Like all spaces in Rainham Parkside Village, it will promote habitat creation and biodiversity.





NEIGHBOURHOOD  
GREEN

WOODLAND  
WALK

SECONDARY  
SCHOOL



Site Area  
**51**  
Hectares



- Local Centre 0.4 ha
- School 8.6 ha (2.4 ha primary school, 6.2 ha secondary)
- Care Home 0.6 ha
- Open space 15.8 ha
- Up to 750 new homes 24.7 ha
  - Circa 20 dph
  - Circa 25-29 dph
  - Circa 35-39 dph



# Illustrative plot studies

## 1. Local centre

A series of mixed and community uses, including a new primary school, will anchor the new neighbourhood, provide easy access from the wider community to uses and be within a short distance to existing bus services. These mixed and community uses have been determined by assessing the missing uses within the wider area, and to address the likely needs from future residents to create a more vibrant and sustainable neighbourhood.

The following uses are proposed:

- 2FE primary school
- Children's nursery
- Community hub
- Healthcare hub
- Care Home
- Temporary accommodation

The layout of the local square will be based on rural clustering of agricultural buildings to create a series of connected open spaces to provide spaces for play, nature, local events and socialising.

The design of the buildings will appear as a collection of contemporary farm sheds, celebrating local materials and details whilst providing vaulted spaces and a strong rural aesthetic.



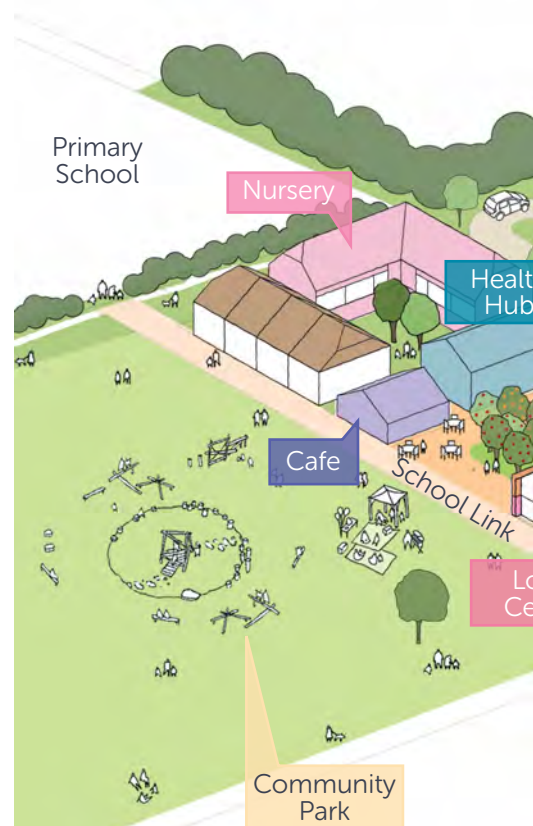
The Farmstead, Linmere, Houghton Regis



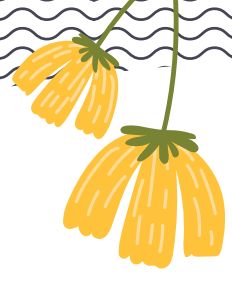
Dollman Farm, Houlton, Rugby



Cafe Hogmoor, Bordon







COMMUNITY USES

SOCIAL SPACE

LINKING KEY ROUTES



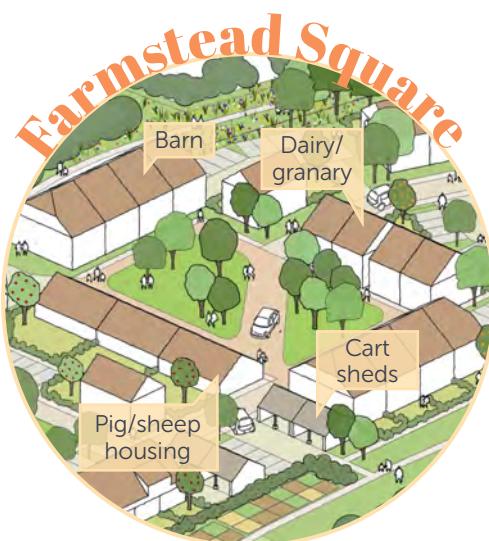


## 2. Farmstead plots

Outside of the local centre, the site will be defined by a series of farmstead plots, with greater clustering of homes in small terraces and semi-detached homes closest to the local centre, and lesser densities beyond.

Each farmstead plot will create a distinct local place based on the immediate site context. Each will be defined by a rural palette of materials and reference the local vernacular, such as the existing farmsteads within Lower Rainham and listed buildings along Pump Lane and Lower Rainham Road.

Farmstead plots will celebrate the strong rural character in both built form and greenery, which responds to the rural and food growing context. Each plot will develop up to 35-39 dwellings per hectare and be designed as a series of small lanes and spaces to create a strong sense of community amongst the future residents. Each plot will have multiple pedestrian links to the grid of activate travel routes.



SPACE TO GATHER

SHARED AND SOCIAL SPACE

INFORMAL PLAY SPACE



Dollman Farm, Houlton, Rugby



Millers Field



Cheshire Countryside farmstead development

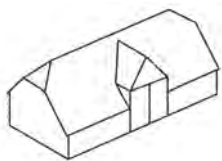


Existing properties at Lowndres Farm, Cheshire Countryside

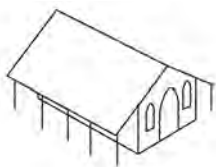




Barn



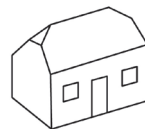
Dairy/ granary



Pig/ sheep housing



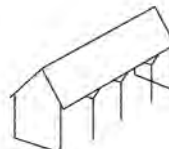
Stables



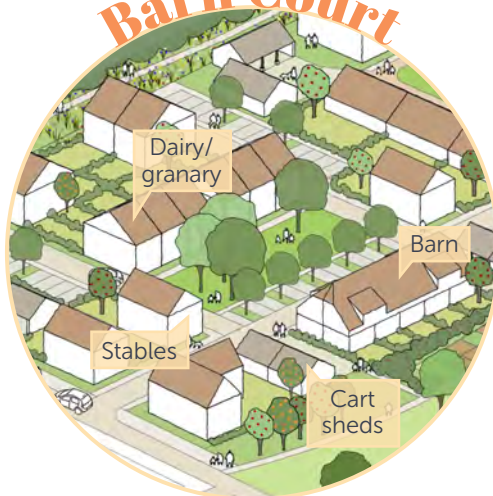
Dairy/ granary



Cart sheds



## Barn Court



ENTRANCE COURTYARD  
SOCIAL SPACE  
LINKING KEY ROUTES

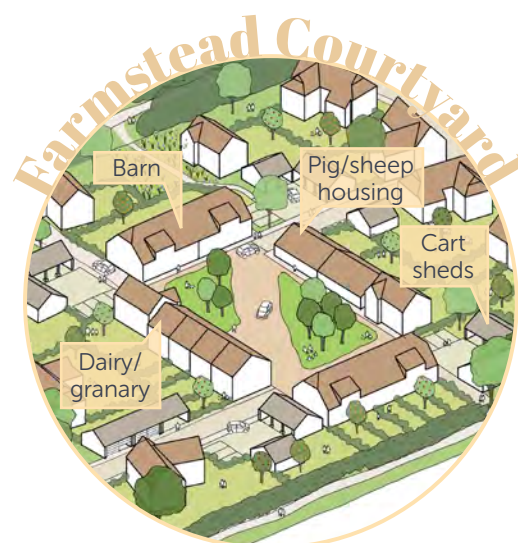




### 3. Lower density farmstead plots

To the periphery of the Site, lower density farmstead plots will provide greater greenery, more open space and lesser impact on adjacent lanes and next to existing development, such as along Lower Twydall Lane to the west and Lower Bloors Lane to the east.

These plots will range in density, but each plot will be lower density, typically delivering around 20 dwellings per hectare through detached, semi-detached and small terraced housing types. Homes will celebrate the local vernacular and clustered to create a central focus for each SME plot. Each will have a single vehicular entrance and series of pedestrian routes connecting to the wider active travel network.



PLAYABLE LANDSCAPE

SOCIAL SPACE

INFORMAL PLAY SPACE



Existing farmstead development along Pump lane



Hill Farm



Hill Farm



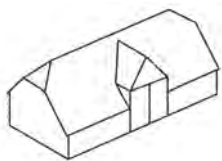
Riverbourne



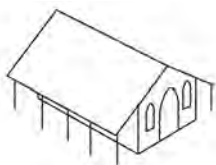
Farmstead main entrance



Barn



Dairy/ granary



Pig/ sheep housing



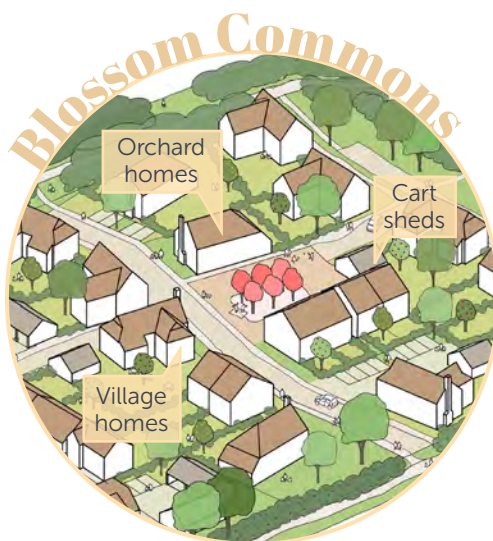
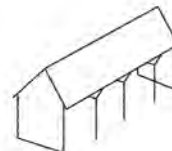
Orchard homes



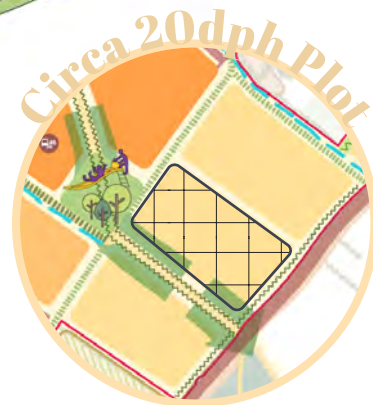
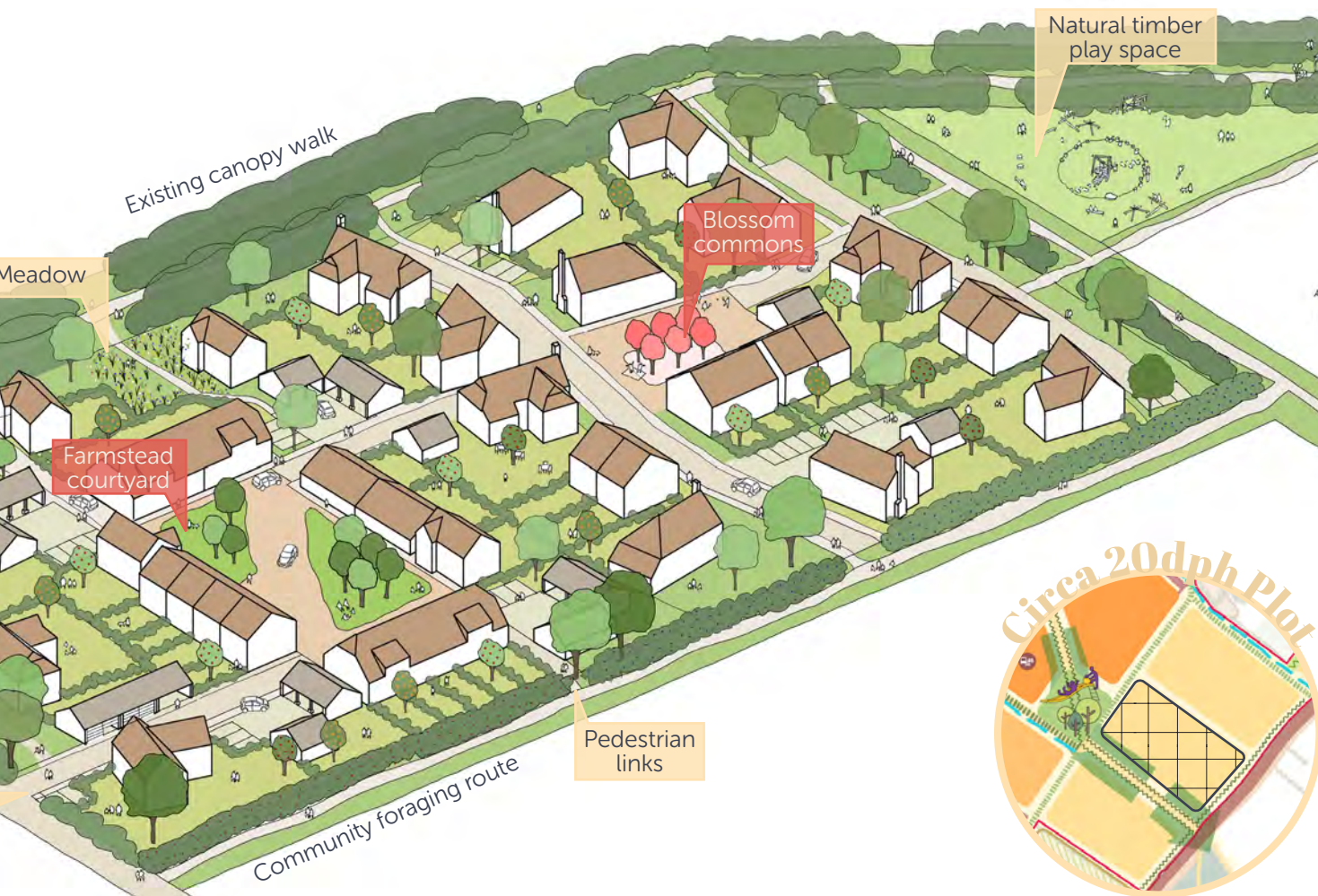
Village homes



Cart sheds



SHARED AND SOCIAL SPACE  
INTEGRAL FOOD GROWING  
KEY ROUTES TO GREEN WALKS



# Economic benefits

## Economic Benefits

### Rainham Parkside Village Lower Rainham, Kent

Rainham Parkside Village will deliver a mixed-use development inspired by the rural context and designed to support sustainable economic growth.

The vision will comprise:

- Up to 750 residential dwellings, including 30% affordable housing;
- A new local centre, providing - a community building, nursery, care home, healthcare hub, Primary and Secondary education provision, and retail.

The Development will generate economic benefits throughout the development lifecycle, construction and operational phase, positively impacting the local and wider economy. This will deliver:

- Direct and indirect employment safeguarded throughout the construction phase, and the accompanying economic output (GVA);
- The provision of much needed homes to support the local labour force and facilitate economic output (GVA);
- Contribution to the local and wider economy through increased local expenditure;
- Fiscal input to local services;
- Operational employment opportunities.

## Construction Phase

Construction of the Development will safeguard employment across a range of occupations, providing the opportunity to support local businesses directly and indirectly. The construction programme will provide pathways for up skilling, training and education, benefiting a diverse community.

DIRECT EMPLOYMENT  
SAFEGUARDED THROUGHOUT  
THE CONSTRUCTION PHASE

**282 FTE**

**145** ARE ASSUMED TO BE  
MAINLY SITE BASED.

INDIRECT EMPLOYMENT  
SAFEGUARDED THROUGHOUT  
THE CONSTRUCTION PHASE

**113 FTE**

OPERATING ACROSS A NETWORK  
OF SUPPORTING SUPPLY CHAIN  
INDUSTRIES.

GVA GENERATED THROUGHOUT  
THE CONSTRUCTION PHASE

DIRECT  
**£108.4m**

INDIRECT  
**£41.1m**

TOTAL GVA  
**£149.5m**

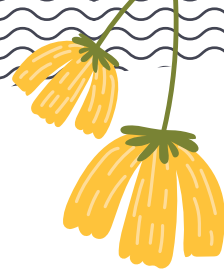
EMPLOYMENT EFFECT TO  
MEDWAY RESIDENTS  
THROUGHOUT THE  
CONSTRUCTION PHASE

**276**

MEDWAY RESIDENTS TO BENEFIT  
FROM DIRECT AND INDIRECT  
EMPLOYMENT OPPORTUNITIES.

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## Operational Phase

The Development will deliver a mix of housing to support the existing and future local labour force. Residents will contribute to the economy and local services through household expenditure and fiscal funding. The Site will generate employment opportunities across a range of occupations.

### UP TO 750 HOMES

**1,965**  
RESIDENTS

**1,033**  
OF WHICH WILL  
BE EMPLOYED

GENERATING  
**£54.0m**  
IN GVA PER ANNUM

### HOUSEHOLD EXPENDITURE

**£20.1m**

PER ANNUM IN  
CONVENIENCE, LEISURE  
AND COMPARISON SPEND.

### ANNUAL COUNCIL TAX PAYMENTS

**£3.1m**

CONTRIBUTING TO

**£2.6m**  
MEDWAY COUNCIL

**£0.4m**  
KENT POLICE

**£0.1m**

KENT FIRE & RESCUE

### DIRECT EMPLOYMENT GENERATED BY THE LOCAL CENTRE

**316** DIRECT  
FTE

SUPPORTED ON-SITE  
THROUGHOUT A RANGE OF  
OCCUPATION, GENERATING

**£13.5m**  
IN GVA PER ANNUM

AROUND

**£0.2m**

ANNUAL BUSINESS RATE  
PAYMENTS SUPPORTING  
LOCAL SERVICES.

### TOTAL SOCIAL COMMUNITY BENEFITS THROUGH CARE HOME PROVISION

POTENTIAL

**£4.0m**

ANNUAL VALUE OF IMPROVED  
HEALTH, WELLBEING AND  
REDUCED COSTS

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# Social Value High Level Mapping

Social value does not have a single, universally accepted definition, however broadly it is about creating social, economic and environmental wellbeing. According to best practice it must align with local context. This involves identifying local needs, creating outcomes with communities, and monitoring of outcomes. Definitions of social value used are taken from the UK Green Building Council<sup>1</sup>.

This review is a first step in demonstrating how the design of the Rainham Parkside Village opportunity can create social value outcomes through mapping how the proposals respond to existing local needs. We identified key needs by reviewing Medway Council's identified policy priorities and the evidence bases used to create these<sup>2</sup>.

Social Value Type	Local Policy	Local Policy Priority	Local Need Identified	Site Social Value Response
 <b>Social</b> Interventions that impact community networks, community engagement, local identity, diversity of building uses, security & safety and public spaces.	One Medway Council Plan	Delivering Quality Social Care and Community Services	Ageing population <sup>3</sup> Needed for increase school places <sup>4</sup> Need for good quality community facilities that attract a range of users <sup>5</sup>	Care home - 1.5 acres All-through school Children's nursery - 615 sqm Community hub - 160 sqm Healthcare hub - 160 sqm
	One Medway Council Plan	Improving Health and Wellbeing for All	Lower rates of physical activity (adults & children) than national average in Medway <sup>6</sup>	Pump Lane widened road for walking/cycling path Community Park Incidental play LEAP (Locally Equipped Area for Play)
	Medway's Joint Local Health and Wellbeing Strategy 2024-2028	Healthier, longer lives for everyone Safe, connected and sustainable places		
 <b>Economic</b> Interventions that impact employment, skills, small businesses, affordable housing, physical resilience and accessibility.	One Medway Council Plan	Benefitting from Good Education, Quality Jobs and A Growing Economy	Need for high quality permanent local employment opportunities <sup>7</sup>	Operational Employment (All-through school; Children's nursery; Healthcare Hub) Construction Employment (onsite jobs & supply chain) Community hub (potential employment uses and spaces)
	Medway's Joint Local Health and Wellbeing Strategy 2024-2028	Reduce poverty and inequality		
	One Medway Council Plan	Living in Good Quality Affordable Homes	Decline in home ownership <sup>8</sup> Need for Affordable housing <sup>9</sup> Ensuring quality housing standards across tenures <sup>10</sup> Climate Emergency declared in 2019 <sup>11</sup>	750 new homes 30% Affordable Homes - 225 homes Range of housing: bungalows, self build, private ownership 60% Carbon Efficient Homes - Fabric First Approach EV charging points every dwelling Air source heat pump in design
 <b>Environmental</b> Interventions that impact sustainable transport options, green spaces, air quality, resource use & waste, biodiversity & urban greenery, warm damp-free housing.	One Medway Council Plan	Enjoying Clean, Green, Safe and Connected Communities	Access to public green space is worse in Rainham North compared to Medway as a whole <sup>12</sup> Proportion of adults that walk and cycle for any purpose Medway is lower than the South East <sup>13</sup>	Low density plots Woodlands & Orchards Public open space - 16.2 Ha 10% BNG uplift Active travel throughout site Mobility hubs 20 mph routes

<sup>1</sup>Framework For Defining Social Value, UK Green Building Council 2021

<sup>2</sup>Medway Councils Social Value Policy was requested, however no reply has been received. The One Medway Council Plan has been used as a basis of identifying need, as indicated in the Procurement Strategy Update 2023 Medway Council's Social Value Policy is based on these priorities.

<sup>3</sup>Medway JSNA Chapter Adult Care and Support, 2024

<sup>4</sup>Annual Review of the School Place Planning Strategy 2022-2027, 2023

<sup>5</sup>Medway Village Infrastructure Audit, 2017

<sup>6</sup>Medway JSNA Chapter Physical Activity, 2024

<sup>7</sup>Medway 2035, 2017

<sup>8</sup>One Medway Council Plan, 2024

<sup>9</sup>Medway Housing Strategy 2023

<sup>10</sup>One Medway Council Plan, 2024

<sup>11</sup>Climate Change Action Plan; Planning and Development, 2019

<sup>12</sup>Rainham North Ward Profile, 2023

<sup>13</sup>Medway Local Cycling and Walking Infrastructure Plan Consultation Report, 2024







## 12. Way forward for a sustainable neighbourhood

The DFD is prepared for illustrative purposes to allow a greater understanding of the Site's opportunities and constraints.

Esquire Developments understands the importance of early engagement and, to ensure views of local stakeholders are taken on board, will undertake a number of engagement exercises as the scheme progresses.

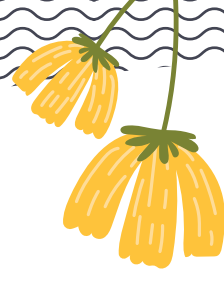
Initially, informal engagement will be undertaken with Rainham Parish Council, as well as neighbouring residents and community groups.

Alongside this, ongoing discussions will continue with Medway Council to promote the site for allocation through the emerging Local Plan review, as an appropriate location for development.



Woodland Walk Vision Render (Render by Match)





## Economic

As illustrated, the proposed development would bring about numerous economic benefits to the local and wider economy through the provision of construction jobs, increased economic output through the residential population and commercial expenditure in the local economy.

The proposed development would thereby support the economic dimension of sustainable development.

## Social

The provision of up to 750 new homes including 225 affordable homes (30%), is a significant social benefit of the scheme which will help support the vitality of Rainham.

Furthermore, the delivery of a range of dwelling sizes and types will help provide opportunity and choice in the housing market, including the provision of bungalows for sheltered housing and private ownership.

The proposals also seek to bring forward large areas of open space. Therefore, bringing further social benefits through the provision of new recreational activities.

## Environmental

Development proposals will contribute towards the environmental dimension of sustainable development through provision of new landscaping, open space and other green infrastructure on the Site.

The proposed development will seek to promote opportunities for habitat enhancement, providing a positive contribution to biodiversity across the Site. The proposed development will provide 10% Biodiversity Net Gain.

Crucially, Esquire Developments' ethos is to meet and exceed Carbon Reduction requirements. This means Esquire homes tend to be up to 60% carbon efficient. This is delivered through a fabric first approach, air source heat pumps and the delivery of electric vehicle charging points on every dwelling.

## Summary

The proposed development of the Site would meet the three elements of sustainable development in accordance with the advice in the NPPF. The Site is considered to be a sustainable form of development.





BPTW, 40 Norman Road  
Greenwich  
London SE10 9QX  
t. 020 8293 5175

[bptw.co.uk](http://bptw.co.uk)



**Appendix B**  
Affordable Housing Statement

# **Affordable Housing Statement**

## Pump Farm and Bloor Farm

August 2025



# Contents

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3.	Affordable Housing Policy and Guidance	5
4.	Affordable Housing Needs	15
5.	Past Affordable Housing Delivery	23
6.	Market Conditions	27
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Annie Gingell



**Client**

Esquire Development

**Our reference**

02276

August 2025

# 1. Introduction

- 1.1 This Affordable Housing Statement has been prepared by **Turley** on behalf of **Esquire Developments** to provide a review of the proposed affordable housing policy framework as set out in the emerging Medway Regulation 19 Draft Local Plan.
- 1.2 Esquire Developments have land interests in relation to Pump and Bloor Farm, Rainham which is being promoted for allocation in the emerging Local Plan for up to 750 dwellings. If allocated, the site would provide 30% of the units on site as affordable dwellings (up to 225 homes) and an additional up to 15 homes for use as temporary accommodation. The site currently comprises a draft allocation under emerging Policy SA10: Lower Rainham.
- 1.3 This Statement explores the proposed affordable housing policy framework and the material considerations that support the delivery of affordable housing at the site. It assesses emerging policies within the draft Local Plan, alongside national policy, and local housing needs assessments, in order to provide a comprehensive understanding of the level of affordable housing being planned for and associated delivery mechanisms.
- 1.4 The analysis also underlines the importance of adopting the Local Plan without delay to ensure that Medway's significant and growing unmet need for affordable housing can begin to be addressed.
- 1.5 In addition to publicly available data, this Statement relies upon obtained data from the Council through a Freedom of Information (FOI) request, available to view at **Appendix AH1**.

## Structure of this Statement

- 1.6 This Statement is structured as follows:
  - Section 2 - Affordable Housing Offer
  - Section 3 - Affordable Housing Policy and Guidance
  - Section 4 - Affordable Housing Needs
  - Section 5 - Past Affordable Housing Delivery
  - Section 6 - Market Conditions
  - Section 7 - Summary



## 2. Affordable Housing Offer

- 2.1 The proposed development is for up to 750 dwellings, of which 30% (up to 225 dwellings) are to be provided on-site as affordable housing and an additional up to 15 homes for use as temporary accommodation.
- 2.2 This level of provision meets expectations of emerging Policy T3 which seeks 30% provision from suburban greenfield sites of 10 or more residential units.
- 2.3 Whilst the final tenure split of the affordable housing units on the site is to be agreed with the Council during the determination of the application; Table 2.1 below sets out the proposed indicative tenure split.

*Table 2.1: Indicative Tenure Split of Affordable Housing Units*

Tenure	No. Affordable Units	%age
Social Rent	Up to 90	40%
Affordable Rent	Up to 56	25%
Shared Ownership	Up to 79	35%
<b>Total</b>	<b>225</b>	<b>100%</b>

- 2.4 The indicative tenure split reflects the findings of the Medway Local Housing Needs Assessment published in 2025 (2025 LHNA), which identified a need for 40% Social Rent, 25% Affordable Rent, and 35% Shared Ownership dwellings. The 2025 LHNA forms the evidence base for the housing policies in the emerging Local Plan.
- 2.5 The affordable housing provision will be secured through a Section 106 Planning Obligation.
- 2.6 The delivery of the site's affordable housing offer is contingent upon adoption of the emerging Local Plan. Without an up-to-date and adopted policy framework, there is a risk that much-needed affordable homes will be delayed, further exacerbating the borough's acute and growing shortfall. This highlights the pressing need for the Local Plan to be adopted in a timely manner to unlock delivery.

### 3. Affordable Housing Policy and Guidance

#### Introduction

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan as a whole unless other material considerations indicate otherwise. In the context of Local Plan preparation and examination, this principle underlines the importance of ensuring that the emerging plan is capable of providing a robust basis for decision-making.
- 3.2 The weight to be afforded to the emerging Local Plan will increase as it progresses through the preparation stages, but the adopted Development Plan remains the primary basis for decisions until formal adoption of the new Plan. Material considerations, including national policy and guidance, also play a critical role in assessing the soundness and legal compliance of the Local Plan.
- 3.3 This section identifies the relevant adopted and emerging Development Plan documents for the provision of affordable housing at the site; looking specifically at the key challenges and objectives that the Council identifies regarding their approach to affordable housing provision. It also considers the emerging policies that will govern affordable housing provision across Medway as well as any pertinent material considerations.

#### Adopted Development Plan

- 3.4 The Medway Local Plan was adopted in May 2003 and covers the 20-year period from 1996 to 2006. Despite its age, the Local Plan continues to be used in the determination of planning applications and many of its policies have been saved under the transitional arrangements of the Planning and Compulsory Purchase Act 2004.
- 3.5 Affordable housing is addressed from page 168 onwards. Paragraph 5.5.5 highlights that *“there are significant numbers of people who need homes but cannot afford to buy on the housing market. There is a need to provide these people with opportunities to obtain homes through affordable housing”* Paragraphs 5.5.7 to 5.5.10 summarise the key findings of housing needs surveys carried out in 1997 and 1998, including:
- A total of 3,836 households were seeking to move but could not afford to buy or rent at market prices at the time.
  - When including those on the housing waiting list (Housing Register) and those registered as homeless, the total unmet housing need of 7,136 dwellings was identified.
  - These findings were taken into account to produce an estimate of net housing needs likely to arise between 1998 and 2006, totalling 10,695 dwellings.
- 3.6 While these findings are over twenty years old, they demonstrate that addressing affordable housing need was a significant issue at the time of the Local Plan’s adoption and one which the Council recognised as needing action.



- 3.7 **Policy H3 ‘Affordable Housing’** is the key policy for affordable housing provision in the Local Plan. Although it does not set a borough-wide target or specify recommended tenure splits, it does establish the development thresholds for which affordable housing will be sought. The policy states:

*“Where a need has been identified, affordable housing will be sought as a proportion of residential developments of a substantial scale.*

*A substantial scale is defined as follows:*

- i. in settlements in rural areas with a population of 3,000 or fewer, developments which include 15 or more dwellings or where the site area is 0.5hectare or more;*
- ii. Within the urban area, developments which include 25 or more dwellings or where the site area is 1 hectare or more.”*

- 3.8 The policy was prepared in the context of now-superseded national guidance (PPG3 and Circular 6/98) and therefore does not reflect current definitions, development thresholds, or tenure requirements for affordable housing provision as set out in the NPPF (2024) and associated Planning Practice Guidance (PPG).
- 3.9 The age and limitations of Policy H3, including its basis in outdated national policy, highlight the urgent need for a new Local Plan.
- 3.10 An up-to-date Plan is essential to provide a clear, consistent framework for affordable housing delivery, aligned with current national policy and supported by a robust and up-to-date evidence base. Without this, the Council risks continuing to rely on outdated thresholds and definitions that do not reflect current housing needs or expectations.

### **Emerging Development Plan**

- 3.11 The Council is currently preparing a new Local Plan which will cover the 15 year period from 2026 to 2041. A Regulation 18 consultation was held in Summer 2024, and the current Regulation 19 draft Local Plan is subject to public consultation until 11 August 2025. This section provides comments on the Regulation 19 version of the draft Plan.
- 3.12 The introduction makes clear at paragraph 1.2.4 that the Plan must address big issues for Medway including provision of *“high quality energy efficient homes that are affordable and within the reach of residents.”* Paragraph 1.2.8 goes on to note that:

*“The Local Plan is much more than identifying sites for new housing, but this is a key part of the Plan. **There are huge pressures on housing. Decent homes are unaffordable for many people. Unfortunately, some of the accommodation locally is sub-standard and there are challenges in securing decent standards with some conversions, particularly where they are undertaken under permitted development. The supply of new housing is central to the new Local Plan, but it is about more than housing numbers. The Plan seeks to improve the choice and mix of homes, drive up quality, and meet the needs of different sectors of the community.** Housing-led growth can support wider investment in services*

*and businesses and contribute to shaping the character of new and existing communities.” (emphasis added).*

- 3.13 Paragraph 1.3.5 highlights that *“Housing is a major issue for the plan, and the scale of defined housing needs requires significant land to be identified for new housing sites”* going on to note that *“The annual need for 1,636 homes a year has been projected over 15 years of the plan period to 2041, resulting in a need to plan for 24,540 homes”*. Paragraph 1.3.6 makes clear that:

*“The supply provided in the draft plan consists of:*

- Pipeline sites (with planning consent, not completed or allocated) – 1,762*
- Local Plan allocations – 21,194*
- Windfall sites – 1,584”*

- 3.14 It is noted that the housing requirement does not appear under a specific policy. Whilst this is not an explicit legal requirement, national policy and good plan-making practice strongly support the inclusion of a clearly defined housing requirement within a strategic policy. This ensures clarity for decision-makers, developers, and communities, and provides a robust basis for monitoring delivery, calculating the five-year housing land supply, and applying the Housing Delivery Test.

**To ensure the plan meets the tests of soundness, particularly effectiveness and consistency with national policy, it is recommended that the housing requirement is included within a specific strategic policy, expressed as a minimum figure for the plan period.**

- 3.15 Similarly, the draft plan does not appear to include an explicit affordable housing target within a policy. Given the scale of affordable housing need identified in the evidence base, and the importance of addressing this need as part of the overall Housing Strategy, it is essential that the plan sets out a clear target for affordable housing delivery over the plan period. This target should be based on the findings of the 2025 LHNA and used to guide site allocations, development management decisions, and future monitoring.

**It is recommended that a clearly stated affordable housing target should be included in a strategic policy. This will provide transparency, support consistency in decision-making, and ensure the plan is positively prepared and effective in meeting identified needs, in line with paragraphs 61 and 63 of the NPPF.**

- 3.16 The ‘Vision and Strategic Objectives’ for the Plan are set out in Chapter 2. The ‘Vision for Medway in 2041’ on pages 16 to 19 makes clear that by 2041 *“Housing and economic development needs have been met in full”* and that people of *“All sectors and ages of the community can find decent places to live”* in Medway.

- 3.17 The draft Plan sets out four Strategic Objectives. The second is *“Supporting people to lead healthy lives and strengthening our communities”* in order *“To provide for homes of varying types to meet demand in Medway and ensure a cohesive sustainable approach”* and *“To deliver high quality energy efficient homes that meet the housing needs of*



*Medway's communities, reflecting the requirement for affordable housing and the range of sizes and types the area needs,".*

- 3.18 The third objective is to *"Boost pride in Medway through quality and resilient development"* by ensuring that *"housing and economic development needs have been met in full, supported by appropriately phased grey, green and blue infrastructure, so that the needs of Medway's growing and changing communities are well served."*
- 3.19 Together, these Strategic Objectives underscore the central role of affordable housing delivery in shaping a healthy, inclusive, and well-served future for Medway's communities.
- 3.20 Chapter 6 addresses housing need across the Borough. Paragraph 6.1.1 outlines declining affordability across the Borough, noting that house prices have risen by 24% over the last five years meaning that *"Many people cannot afford to gain access to the 'housing ladder' and also face issues of availability and rising costs in the private rented sector"*. The paragraph also highlight's a *"marked increase in homelessness requests in the last three years and greater use of Temporary Accommodation to support people."*
- 3.21 Paragraph 6.1.2 reiterates that, using the Standard Method, the housing need as of 2025 is 1,636 dwellings per annum (dpa), equating to a total gross need across the 15 year plan period of 24,540 dwellings. While the paragraph is clear that the draft Plan seeks to meet this overall housing need in full, it makes no reference to the scale of affordable housing need, nor does it indicate the proportion of that need the Plan aims to meet.
- 3.22 This represents a significant omission given the emphasis in national policy on delivering sufficient affordable homes to meet identified needs.
- 3.23 Section 6.2 concerns housing mix highlighting at paragraph 6.2.1 that *"Accommodation standards and affordability impact on the quality of life of Medway's residents including their health and wellbeing"* Paragraph 6.2.2 goes on to note that *"A key strategic objective of this Local Plan is to provide for the range of housing needs of Medway's communities. The needs of specific groups are reflected in our proposed policies. This is in line with national planning policy and advice in the LHNA evidence base."*
- 3.24 **Draft Policy T2 'Housing Mix'** seeks to ensure that a sufficient range of housing options is delivered through new development. It requires that the proposed housing mix, including affordable housing, is informed by the most recent LHNA or any updated evidence base documents.
- 3.25 It goes on to highlight that applicants will be expected to justify the proposed mix by reference to this evidence and to consider the needs of households on the Medway Housing Register; and early engagement with the Council's Housing Strategy Team is encouraged at the pre-application stage to agree appropriate housing typologies and tenures.
- 3.26 The reasoned justification at paragraph 6.2.3 sets out that findings of the 2025 LHNA supports a mix of around 70% market units remainder split between affordable/social rented and affordable home ownership, including First Homes. In this context it is important to note that the NPPF no longer mandates First Homes provision on major

development sites. Instead, foot note 31 notes that *“Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need.”*

- 3.27 Provision of affordable housing is addressed in Section 6.3. Paragraph 6.3.1 is explicit that:

*“With the cost of living pressures on our communities and escalating housing prices, there are many people in Medway who are **priced out of the housing market**.”* (emphasis added).

- 3.28 Paragraph 6.3.2 provides a high-level definition of affordable housing that broadly aligns with the definition set out in Annex 2 of the NPPF. However, it incorrectly refers to ‘starter homes,’ which are no longer included within the NPPF definition.

**To ensure the draft Plan is future-proof, it is recommended that the wording be amended to explicitly reference the NPPF definition of affordable housing, making an allowance for any subsequent updates to national policy.**

- 3.29 **Draft Policy T3 ‘Affordable Housing’** is the primary policy for affordable housing provision in the draft Plan. In line with paragraph 65 of the NPPF the policy requires that all developments of 10 or more residential units (i.e. major developments) provide affordable housing. The level of provision depends on the location of the site:

- *High Value Areas, including the Hoo Peninsula strategic and suburban greenfield sites, 30% of all residential units proposed.*
- *Lower value areas, 25% of all dwellings proposed in greenfield areas, and 10% of all residential units proposed on previously developed land.*

- 3.30 However, a review of the Local Plan Viability Assessment (specifically Chapter 4) reveals limited clarity on how value areas have been defined geographically. The Assessment simply notes the following at paragraph 4.40:

- *“Water Front - Being the area including St Mary’s Island and the docks to the north of Pier Road, and the Chatham Waterfront. Development in these areas is likely to be flatted development.*
- *Lower Value - The rural areas of Medway, being the Hoo Peninsula and areas to the west of the River Medway, north of Strood.*
- *Higher Value - The remaining areas of Council Area, including those areas within and adjacent to the Medway Towns (including Strood and Wainscott), and including the greenfield areas to the East of Rainham.”*

- 3.31 The absence of a detailed map or clearly defined geographical boundaries for the value areas undermines the effectiveness of Policy T3. Without ward-level definitions or a spatial map illustrating where the different value areas apply, it is not possible to determine with certainty which affordable housing threshold is applicable to a given site.



- 3.32 This ambiguity risks causing confusion for applicants, inconsistency in decision-making, and potential delays in the planning process. In turn, this could hinder the timely delivery of affordable housing across the plan area.

**It is recommended that the final version of the Plan be supported by a detailed map or appendix clearly defining the value areas referenced in Policy T3, to provide certainty for applicants and decision-makers.**

- 3.33 It is also noted that draft Policy T3 proposes that all affordable housing be allocated using a 'local connection cascade'. While the aim of supporting local communities is understandable, the approach risks prioritising geographical connection over housing need. This could lead to households with lower levels of need being allocated homes ahead of others in more acute need, simply because they have a stronger local connection. Such an outcome would conflict with the fundamental purpose of affordable housing policy, which is to meet identified needs in a fair and transparent way.

**It is therefore recommended that the policy be revised to ensure application of local connection criteria does not hinder the objective of addressing the identified affordable housing needs of the Borough as a whole.**

- 3.34 Draft Policy T27 'Reducing Health Inequalities and Supporting Health and Wellbeing' sets out how the Council will maintain and improve the health and wellbeing of residents, noting that this will be achieved by, among other things, *"Providing decent and affordable homes within an attractive environment."* The reasoned justification at paragraph 10.2.10 makes clear that:

*"Responses to earlier rounds of consultation on the emerging Local Plan called for greater recognition to be given to health in planning for Medway's future. Key themes relating to health highlighted by respondents included the need to tackle health inequalities, address the lack of affordable housing [..]"* (emphasis added).

- 3.35 Similarly, paragraph 10.2.11 highlights the findings of a 2023 'Better Health Survey' where "Adult survey respondents emphasised the need for better access to health and care services, affordable, good quality housing and improved job security." (emphasis added). These findings underline the critical role of affordable housing in supporting health outcomes and reducing inequalities and reinforce the need for the Plan to make a clear and measurable commitment to meeting affordable housing needs in full.
- 3.36 Notwithstanding the draft Plan's stated intention to meet housing needs in full and deliver a broad range of affordable homes, it is noted that no monitoring framework is currently published alongside the Regulation 19 version. In the absence of a clear monitoring strategy, it is not possible to determine how the Council will assess whether strategic objectives, including the delivery of affordable housing and the reduction of housing-related health inequalities, are being achieved over the plan period.
- 3.37 The NPPF and Planning Practice Guidance emphasise the importance of effective monitoring in plan-making, particularly in relation to housing delivery. A robust monitoring framework should set out specific indicators, targets, and triggers for review, including (but not limited to) the annual delivery of affordable housing.

To ensure the plan is effective and can be transparently implemented, it is recommended that a comprehensive monitoring framework is included within the Plan itself or as an appendix. This should set out clear indicators against which progress towards housing and affordable housing objectives can be assessed and responded to over the plan period.

## Other Material Considerations

### National Planning Policy Framework (December 2024)

3.38 The latest NPPF was published on 12 December 2024 and outlines the government's planning policies for delivering affordable housing in England within the broader context of sustainable development (paragraph 8) and in support of the Government's objective of significantly boosting the supply of homes (paragraph 61).

3.39 Paragraph 8b highlights that the social objective of sustainable development is to "support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations". Whilst paragraph 61 makes clear that:

*"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed [...]. **The overall aim should be to meet as much of an area's identified housing need as possible**, including with an appropriate mix of housing types for the local community" (emphasis added).*

3.40 A significant update pertains to Paragraph 11d(ii), which outlines the presumption in favour of sustainable development where policies are out of date or where a local planning authority cannot demonstrate a five-year supply of deliverable housing sites. Paragraph 11dii emphasizes that in such circumstances permission should be granted unless:

*"(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination" (emphasis added).*

3.41 Key provisions in respect of affordable housing include:

- **Meeting Housing Needs:** Paragraph 61 is clear that in order to support the Government's objective of significantly boosting the supply of homes, the overall aim should be to meet an area's identified housing need in full.
- **Assessing Housing Needs:** Paragraph 62 emphasises that planning policies should be informed by a local housing needs assessment, whilst paragraph 63 is clear that the size, type, and tenure of housing required for different groups, including those requiring affordable housing should be assessed and reflected in planning policies.



- **Affordable Housing Provision:** Paragraph 64 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified.
- **Thresholds for Provision:** Paragraph 65 indicates that affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas where policies may set out a lower threshold of five units or fewer.
- **Affordable Home Ownership:** Paragraph 66 expects that, for major developments involving the provision of housing, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.
- **Mixed Tenure Sites:** Paragraph 71 is clear that mixed tenure sites can provide a range of benefits, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported).
- **Definition of Affordable Housing:** Annex 2 of the NPPF defines affordable housing as housing for sale or rent for those whose needs are not met by the market.

3.42 These provisions are designed to ensure that affordable housing is not only integrated into new developments but also aligns with the evolving needs of diverse community groups, fostering sustainable and inclusive growth for present and future generations.

#### **National Planning Practice Guidance (2014, Ongoing Updates)**

- 3.43 The NPPG is an online resource that provides detailed guidance to support the implementation and application of the NPPF. It was first published in March 2014 and is regularly updated to reflect changes in planning legislation, policies, and best practices.
- 3.44 The *Mead Realisations Limited v Secretary of State for Levelling Up, Housing and Communities* [2025] Court of Appeal Judgement confirms that the NPPG has the same policy making status as the NPPF.

#### **Corporate Documents**

- 3.45 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority. These include the following documents:
- Housing Strategy 2018 - 2022;
  - Homelessness and Rough Sleeper Strategy 2019 – 2024; and
  - One Medway Council Plan 2024 – 2028.

## Conclusions

- 3.46 The delivery of affordable housing remains one of the most pressing challenges facing Medway. While the adopted Local Plan provides some policy coverage through Policy H3, it is now over 20 years old and based on long superseded national guidance. It lacks a borough-wide target, does not reflect current definitions of affordable housing, and applies thresholds that are no longer aligned with national policy. The urgent need for a new, up-to-date Local Plan is clear.
- 3.47 The emerging Local Plan demonstrates a clear ambition to address housing pressures and promote more inclusive, healthier communities. However, there are several critical gaps that undermine its effectiveness in relation to affordable housing provision. These include the absence of:
- a clearly defined housing requirement within a specific policy;
  - an explicit target for affordable housing delivery based on up-to-date evidence;
  - a detailed and spatially defined viability framework to guide policy implementation; and
  - a comprehensive monitoring framework to track delivery and enable timely policy response.
- 3.48 National policy and guidance are unambiguous in requiring local plans to meet identified housing needs in full, including affordable housing, and to do so transparently, consistently, and fairly. The current Regulation 19 draft of the Local Plan does not yet fully meet these expectations.
- 3.49 To ensure the Local Plan is found sound and provides a robust basis for decision-making, it is recommended that:
- the housing requirement is included within a specific strategic policy;
  - a borough-wide affordable housing target, tenure mix, and delivery expectations are clearly defined in policy;
  - value areas and local connection criteria are robustly justified and spatially delineated; and
  - a full monitoring framework is included within the Plan or its appendices, with clear, measurable indicators relating to affordable housing need and delivery as well as for wider housing delivery.
- 3.50 Material considerations including the NPPF, Planning Practice Guidance, and Corporate Strategies consistently identify affordable housing delivery as central to achieving sustainable development and improving health and wellbeing outcomes. The Council must ensure that the final version of the Local Plan reflects these priorities in full if it is to be positively prepared, justified, effective and consistent with national policy.



- 3.51 Crucially, it is not just the content of the Plan that matters, but its adoption. The continued absence of an up-to-date Local Plan is a significant barrier to addressing Medway's worsening affordable housing crisis. Formal adoption of the Plan is essential to provide clarity for applicants, unlock delivery on strategic sites, and begin to meaningfully tackle the borough's high and growing levels of unmet housing need.

## 4. Affordable Housing Needs

### Introduction

- 4.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as the emerging Development Plan and its associated evidence base in order to provide a comprehensive understanding of formally identified affordable housing needs across the Borough.
- 4.2 In addition to formal assessments, this section examines other indicators of affordable housing need such as the Housing Register, waiting times, and homelessness rates. These real-world metrics offer additional insights and perspective on the pressing need for affordable housing in Medway.

### Adopted Development Plan

- 4.3 Since the adoption of the Local Plan in 2003 there have been significant changes to national policy in respect of the provision of affordable housing. Key changes include the introduction of the NPPF in 2012 and subsequent revisions which have further broadened the definition of affordable housing. As such the evidence base underpinning the adopted Local Plan is not considered relevant in this context.
- 4.4 The Council's Guide to Developer Contributions Supplementary Planning Document (SPD) published in May 2018 and updated in April 2025 makes reference to the 2015 North Kent Strategic Housing Assessment at paragraph 1.2 noting that it:

*"clearly identifies a need for additional affordable housing in Medway and the Council is committed to meeting this"* (emphasis added).

- 4.5 The North Kent Strategic Housing Market Assessment was published in November 2015 (2015 SHMA) and jointly commissioned by Medway Council and Gravesham Borough Council to inform the evidence base for their respective emerging Local Plans at that time.
- 4.6 The 2015 SHMA calculates housing need for the respective authorities over the 25-year projection period between 2012/13 and 2036/37 and the 18-year potential plan period from 2017/18 to 2034/35. Table 61 on page 137 identifies the following affordable housing need figures for the respective scenarios:
- Projection period: Identifies a net need for 721 new affordable homes each year, equivalent to 18,016 affordable dwellings over the 25-year period.
  - Potential Plan period: Identifies a net need for 721 new affordable homes each year, equivalent to 12,972 affordable dwellings over the 18-year period.
- 4.7 Paragraph 6.52 on page 138 goes on to note that:

*"Allowing for Medway's 3.2% vacancy rate (which adequately facilitates housing market churn) this identifies an affordable requirement of 18,592 dwellings over the projection*

*period (2012 – 2037), 13,387 dwellings over the potential future Local Plan period (2017 – 2035), and 744 dwellings annually.”*

- 4.8 As such, the annual need for 744 net affordable dwellings per annum over the 25-year period from 2012/13 to 2036/37, as identified in paragraph 9.31 of the 2015 SHMA, has been used in the subsequent analysis within this Statement.

### **Emerging Development Plan**

- 4.9 The Regulation 18 consultation version of the emerging Local Plan was underpinned by the Medway Housing Needs Assessment published in August 2021 (2021 LHNA) prepared by Arc4. The Executive Summary notes that the assessment considers future housing need across all sections of the community over the period 2021 to 2037 (16 years) and to 2040 (19 years).
- 4.10 Table C7 calculates a net annual affordable housing need of 870 affordable homes per annum each year assuming a clearance of gross unmet need over the first 10 years (for consistency with standard method calculation). Paragraph C.25 goes on to note that if the gross unmet need were cleared over 15 years, the annual net need would be 621.
- 4.11 It is unclear which dates the 10 year, and 15 year periods relate to given they do not align with either of the assessment periods defined in the Executive Summary; are not specified within the 2021 LHNA and do not provide a subsequent figures for newly arising need after the backlog of unmet need has been cleared. It has been assumed that both periods start in 2021 in line with the comments made in the Executive Summary.
- 4.12 The current Regulation 19 consultation is underpinned by a Medway Local Housing Needs Assessment published in 2025 (2025 LHNA) prepared by HDH Planning & Development Ltd. Table 6.1 identifies a need for 436 net affordable homes per annum over the 17 year period between 2024 and 2041, equivalent to 7,412 dwellings over the period.
- 4.13 There are notable differences between the affordable housing need figures identified in the 2021 and 2025 LHNA evidence base documents. This variation is primarily attributable to the differing affordability thresholds applied in each assessment. The 2021 LHNA uses a 25% affordability threshold, while the 2025 LHNA adopts a higher threshold of 35%. For context, the Office for National Statistics (ONS) defines an area as "affordable" if a private-renting household would spend no more than 30% of their gross income on rent.
- 4.14 If a 30% threshold had been applied in the 2025 LHNA, it is likely that a greater proportion of households would have been identified as falling into housing need, resulting in a higher overall affordable housing requirement. The selection of a 35% threshold therefore plays a material role in shaping the identified level of need, and it will be important for the Council to clearly explain and justify this assumption in the context of local incomes, housing costs and national benchmarks.



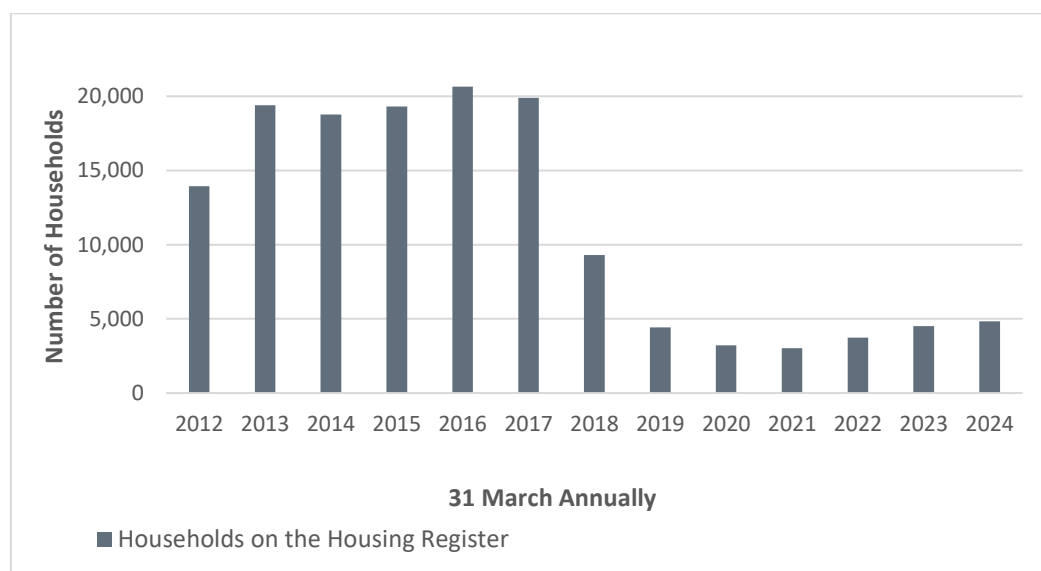
## Indicators of Affordable Housing Need

- 4.15 Key indicators like the number of households on the Councils Housing Register, homelessness rates and households housed in temporary accommodation all serve as crucial markers of current affordable housing need in the Borough.
- 4.16 The data in this section has been obtained from Ministry of Housing Communities & Local Government (MHCLG) published statistics and incorporates data provided in the Council's FOI response (**Appendix AH1**).

### Housing Register

- 4.17 As of 31 March 2024, MHCLG data records 4,830 households on Medway's Housing Register, a 7% increase from 4,515 households in 2023. A Freedom of Information (FOI) response from the Council, however, provides a higher figure of 5,536 households for the same point in time, suggesting that official returns may not capture the full extent of need.
- 4.18 Figure 4.1 illustrates the number of households on the Housing Register in Medway each year between 2012 (start of the 2015 SHMA period) and 2024, based on MHCLG open data. The trend demonstrates significant volatility over the period, with three distinct phases: a sustained increase from 2012 to 2016, a sharp reduction from 2017 to 2021, and a gradual recovery from 2021 to 2024.

*Figure 4.1: Number of Households on the Housing Register, 31 March 2012 to 31 March 2024*



Source: MHCLG Open Data.

- 4.19 Between 2012 and 2016, the Housing Register grew by 48%, peaking at 20,651 households. This increase reflects strong underlying demand for affordable housing. However, from 2017 onwards, the number of households on the register dropped sharply, falling to just 3,026 by 2021, an 85% decrease over five years. This steep reduction is unlikely to reflect a genuine fall in need. Rather, it corresponds with changes

to local eligibility criteria following the Localism Act 2011, which gave local authorities discretion to set their own qualification rules for joining the Housing Register.

- 4.20 The MHCLG itself has acknowledged the impact of these changes, stating that *“The Localism Act 2011 has contributed to a decrease in the size of waiting lists, as it allowed local authorities to set their own qualification criteria.”* Prior to 2012, local authorities could only exclude applicants from the register on limited grounds, such as serious unacceptable behaviour. Post-2012, many councils, including Medway, introduced revised policies that restricted eligibility, which in turn reduced the apparent level of housing need on paper.
- 4.21 Medway Council introduced a revised Housing Allocations Policy in October 2012, implemented from August 2013. This was subsequently updated in 2018 and implemented from 2019. A further revision is currently in preparation, with public consultation on the draft 2025 Housing Allocations Policy open until 1 September 2025.
- 4.22 Since 2021, the number of households on Medway’s Housing Register has steadily increased year-on-year, rising from 3,026 in 2021 to 4,830 in 2024. This represents an increase of 60% over a three-year period. The upward trend follows a period of sustained decline between 2017 and 2021 and suggests that need for affordable housing has been rising in recent years.

#### Waiting Times

- 4.23 The Council’s FOI response (**Appendix AH1**) shows that successful applicants for affordable housing face lengthy waits for an affordable home in Medway.
- 4.24 Table 4.1 illustrates that, based on the dwelling size, successful applicants in the 2023/24 period experienced average waiting times ranging from 1.7 years to 3.41 years for an affordable home.

*Table 4.1: Housing Register Average Waiting Times, 2023/24*

Size of Affordable Property	Average Waiting Time to be Housed (2023/24)
1-bedroom home	611 days (1.7 years)
2-bedroom home	631 days (1.7 years)
3-bedroom home	1,154 days (3.2 years)
4+ bedroom home	1,228 days (3.41 years)

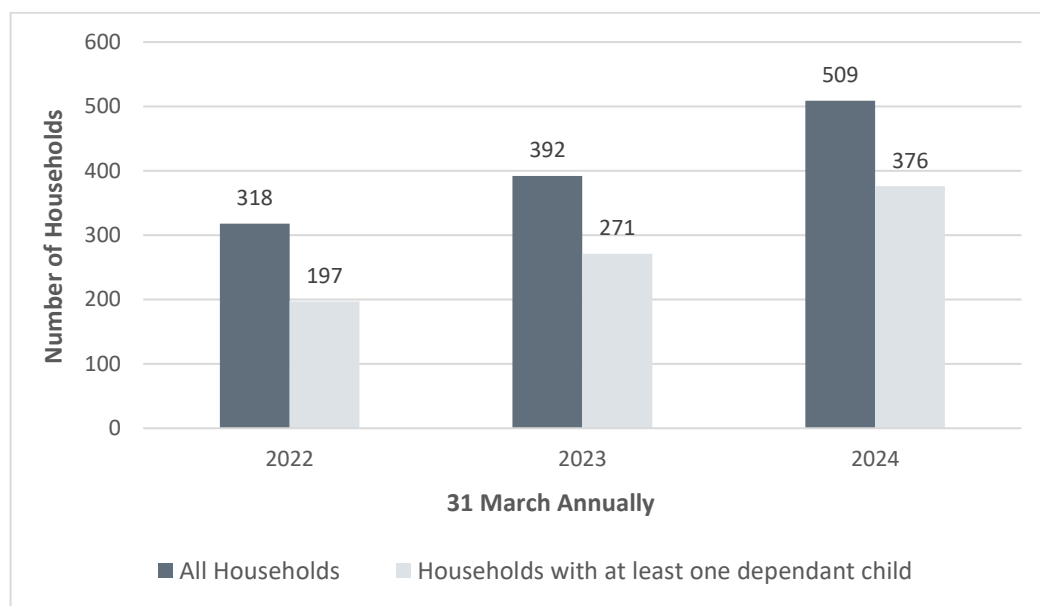
*Source: Freedom of Information response (23 April 2025)*

- 4.25 It is important to note that these figures represent averages, implying that some households may have been waiting even longer than the indicated times. Additionally, these statistics only capture the waiting times for successful applicants, typically those in higher priority need. Households with less urgent needs can anticipate significantly lengthier waiting periods.

### Temporary Accommodation

- 4.26 Temporary accommodation is intended to provide an immediate, short-term housing solution for individuals and families facing homelessness or urgent housing needs.
- 4.27 Figure 4.2 below shows the total number of households and households with children within temporary accommodation in the Borough between 2022 (first published) and 2024. It highlights that **on 31 March 2024 there were 509 households in temporary accommodation**, 74% of which had at least one dependent child.

Figure 4.2: Households in temporary accommodation, 2022 to 2024



Source: MHCLG Open Data.

- 4.28 The data demonstrates a 60% increase in the number of households in temporary accommodation over the three-year period. Whilst the proportion of households with at least one dependent child has remained broadly similar, the total number of households with children has increased by 91% over the period. On 31 March 2024 there were 852 children housed in temporary accommodation by the Council.
- 4.29 Table 4.2 below shows the number of households housed in temporary accommodation by the Council by accommodation type on 31 March 2024.



*Table 4.2: Number households in temporary accommodation by accommodation type, 31 March 2024*

Accommodation Type	Number of Households	%age of Total
Bed and breakfast hotels (including shared annexes)	21	4%
Nightly paid, privately managed accommodation, self-contained	453	89%
Hostels (including reception centres, emergency units and refuges)	0	0%
Leased Private sector accommodation	0	0%
Local authority or Housing association stock	31	6%
Any other type of temporary accommodation	4	1%
<b>Total</b>	<b>509</b>	<b>100%</b>

*Source: MHCLG Open Data.*

- 4.30 Table 4.2 demonstrates that the majority of households (93%) are placed in private sector solutions, including nightly paid, privately managed self-contained units (89%) and bed and breakfast hotels (4%). The fact that just 6% of households were housed in Local Authority or Housing association stock highlights the urgent need for an increase in affordable housing provision across the Council.
- 4.31 The above evidence underscores the pressing need for an increase in rented affordable housing stock to reduce dependency on costly private sector accommodations and provide more stable and suitable housing solutions for households in temporary accommodation. Such an increase would not only alleviate financial pressures on public resources but also offer vulnerable households a greater sense of security and community stability, contributing to improved long-term social and economic outcomes.

### Homelessness

- 4.32 Homelessness is a critical social challenge, reflecting broader issues of housing affordability, availability, and support for vulnerable populations. Authorities have a statutory duty under the Homelessness Reduction Act 2017 to prevent and relieve homelessness:
- The **Prevention Duty** places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
  - The **Relief Duty** requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.
- 4.33 As demonstrated by Table 4.3 below, in the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 1,047 households in need of homelessness prevention duty, and a further 845 households in need of relief duty from the Council.

*Table 4.3: Number households owed a homeless duty by reason for loss of last settled home, 1 April 2023 to 31 March 2024*

Reason for loss of last settled home	Prevention duty		Relief duty	
	No. Households	%age	No. Households	%age
Family or friends no longer willing or able to accommodate	280	27%	376	44%
End of private rented tenancy - assured shorthold	540	52%	91	11%
Domestic abuse	62	6%	117	14%
Non-violent relationship breakdown with partner	20	2%	37	4%
End of social rented tenancy	36	3%	18	2%
Eviction from supported housing	21	2%	35	4%
End of private rented tenancy - not assured shorthold	27	3%	20	2%
Other violence or harassment	12	1%	15	2%
Left institution with no accommodation available	7	1%	64	8%
Required to leave accommodation provided by Home Office as asylum support	2	0%	5	1%
Home no longer suitable - disability / ill health	6	1%	8	1%
Other reasons / not known	34	3%	59	7%
<b>Totals</b>	<b>1,047</b>	<b>100%</b>	<b>845</b>	<b>100%</b>

*Source: MHCLG Open Data.*

- 4.34 The data highlights distinct patterns in the reasons for the loss of settled homes among households receiving Prevention Duty and Relief Duty support. For those under Prevention Duty, the predominant cause is the end of private rented tenancy (assured shorthold), accounting for 52% of cases. In contrast, the inability of family or friends willing or able to accommodate was the secondary issue (27%), reflecting a less urgent but still notable risk factor for future housing instability.
- 4.35 Under Relief Duty, the data shifts to emphasize crisis driven causes. The breakdown of arrangements with family or friends becomes the leading factor (44%), highlighting the reliance on informal housing arrangements as a last resort. Additionally, domestic abuse (14%), and end of private rented tenancy (11%) represent significant contributors, underscoring the urgent need for responsive and supportive housing solutions for vulnerable individuals.

## Conclusions

- 4.36 The evidence presented in this section highlights the sustained and growing need for affordable housing in Medway. While the 2015 SHMA, 2021 LHNA and 2025 LHNA each present different methodologies and assumptions, all confirm a significant shortfall in affordable homes across the Borough.

- 4.37 The reduction in the identified need between the 2021 and 2025 assessments reflects changes in affordability thresholds but does not necessarily indicate a reduction in actual need. It is essential that the assumptions underlying these assessments are clearly justified to ensure the emerging Local Plan is based on a robust and transparent understanding of housing needs.
- 4.38 Real-world indicators strongly support the picture of high and increasing need. The Housing Register has grown by 60% since 2021, suggesting rising pressures on local housing supply. Waiting times for affordable homes are lengthy, particularly for larger properties, with successful applicants waiting over three years for four-bedroom homes.
- 4.39 At the same time, the number of households in temporary accommodation has risen sharply, with most housed in private sector provision, and a notable increase in the number of children living in temporary settings. Homelessness figures show that large numbers of households are at risk of losing or have already lost settled accommodation, with informal living arrangements and private tenancies proving increasingly unstable.
- 4.40 Taken together, the evidence demonstrates a clear and urgent need to increase the supply of affordable housing in Medway, particularly in the rented sector. The Council's emerging Local Plan must be supported by a clearly defined affordable housing target based on up-to-date and locally appropriate evidence. It must also be accompanied by policies and delivery mechanisms capable of responding to the scale, nature, and urgency of identified need, including the needs of families, single adults, and vulnerable households at risk of homelessness.
- 4.41 To move from analysis to action, it is essential that the Local Plan is adopted without further delay. Until a new, up-to-date Plan is in place, the Council will continue to lack the policy tools and certainty needed to meet the Borough's considerable affordable housing needs. Adoption will provide the framework necessary to secure delivery on strategic sites and ensure that the growing backlog of unmet need starts to be addressed.



## 5. Past Affordable Housing Delivery

### Introduction

- 5.1 This section reviews past rates of affordable housing delivery across Medway, revealing significant and persistent shortfalls against identified needs. These findings underscore an urgent and pressing need for a substantial increase in affordable housing provision throughout the Borough.
- 5.2 The analysis in the section is underpinned by the data tables provided at **Appendix AH2**, which have been compiled from Ministry of Housing Communities & Local Government (MHCLG) published statistics.

### Additions to Affordable Housing Stock

- 5.3 Since the start of the 2015 SHMA period in 2012, the Council has added a total of 2,453 gross affordable dwellings to its housing stock, equivalent to just 304 new dwellings per annum. When compared with the total net housing completions figure of 9,885 dwellings, gross affordable housing delivery has represented 25% of additions.
- 5.4 In an October 2024 WMS on 'Social and Affordable Housing', Deputy Prime Minister Angela Rayner MP made clear that:

*"These measures to increase affordable housing come alongside changes to the Right to Buy scheme. **England's existing social housing supply is depleted every year by the scheme** while also disincentivising councils to build new social housing. To address this, the Chancellor will confirm at Budget that councils will be able to retain 100% of the receipts generated by Right to Buy sales. **This will enable councils to scale-up delivery of much needed social homes whilst still enabling longstanding tenants to buy their own homes**" (emphasis added).*

- 5.5 Similarly in her closing speech at the Social Housing Conference on 20 November 2024 the Deputy Prime Minister was clear that:

*"I want to say loud and clear that no longer will social housing be seen as an after-thought, or worse actively discouraged. [...] It starts by going **net positive** because we want to build more social homes than we lose. This matters. For the 1.2 million households on the waiting list for a safe and secure home. For the 150,000 children stuck in unsuitable temporary accommodation. [...] And as I said, this is personal for me. Because I know that a secure, affordable home is not a luxury or simply nice to have. It's the foundation on which everything else is built." (emphasis added).*

- 5.6 Whilst the gross data from MHCLG accounts for new build affordable dwellings and acquisitions from the private sector, it does not account for any reductions in affordable housing stock due to demolitions or Right to Buy sales from Council and/or RP affordable

housing portfolios. Table 5.1 below illustrates the effect of Right to Buy sales on gross additions in Medway.

*Table 5.1: Net Additions to Affordable Housing Stock, 2012/13 to 2023/24*

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2012/13	227	13	214
2013/14	170	11	159
2014/15	173	16	157
2015/16	189	18	171
2016/17	95	23	72
2017/18	112	14	98
2018/19	167	12	155
2019/20	305	18	287
2020/21	70	4	66
2021/22	349	13	336
2022/23	209	11	198
2023/24	387	3	384
<b>Totals</b>	<b>2,453</b>	<b>156</b>	<b>2,279</b>
<b>Avg. Pa.</b>	<b>204</b>	<b>13</b>	<b>191</b>

*Source: MHCLG Open Data*

- 5.7 The data highlights that over the 12 year period there has been a total of 156 losses to affordable housing stock through the Right to Buy, this represents 6% of gross additions. When the effect of the Right to Buy is taken in to account the Council has delivered 2,279 net affordable homes since 2012/13, equivalent 191 dwellings per annum. This represents only 23% of total net housing additions. This figure is likely to fall even further if demolitions were taken into account<sup>1</sup>.

### **Net Additions vs Net Needs**

- 5.8 When comparison is drawn between the affordable housing needs identified in the 2015 SHMA, a cumulative shortfall of 6,355 affordable homes has accrued in the 12 year period. Table 5.2 calculates the current cumulative shortfall against the headline affordable housing need figure of 870 net dwellings per annum identified in the more recent 2021 LHNA.

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<sup>1</sup> MHCLG does not provide affordable housing demolition data at local authority level.

*Table 5.2: Net Additions to Affordable Housing Stock Compared to Affordable Needs identified in the 2021 LHNA, 2021/22 to 2023/24*

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	336	870	-534	-534	39%
2022/23	198	870	-672	-1,206	23%
2023/24	384	870	-486	-1,692	44%
Total	918	2,610	-1,692		35%
Avg. Pa	306	870	-564		

Source: MHCLG Open Data; and 2021 LHNA.

- 5.9 Table 5.2 demonstrates that in the three year period since the start of the 2021 LHNA period in 2021/22 the Council has delivered just 918 net affordable homes. This has resulted in a cumulative shortfall of 1,692 affordable homes against a need for 2,610.
- 5.10 The average annual delivery of 306 affordable homes per annum starkly contrasts with the identified need of 870 affordable homes per year. In percentage terms just 35% of needs were met over the period. In other words, 65% of households in need of an affordable home did not have their needs met over the period.
- 5.11 The most recent 2025 LHNA identifies an annual net affordable housing need of 436 dwellings per annum over the period 2024 to 2041. While this figure is lower than that set out in the 2021 LHNA, it remains significantly higher than the long-term average rate of delivery in Medway.
- 5.12 At no point since the start of the 2015 SHMA period in 2012 has the Council delivered affordable housing at or above this level. The average net delivery of just 191 dwellings per annum since 2012 equates to less than half the need identified in the 2025 LHNA, underscoring the need for a substantial and sustained uplift in delivery if current and future needs are to be met.

### **Addressing the Shortfall**

- 5.13 In my view, the scale of the shortfall, combined with the substantial number of households on the Council's Housing Register, underscores an urgent and pressing need for affordable housing. The 4,830 households on the Council's Housing Register are in need of an affordable home *now*; as are the 852 children in temporary accommodation.
- 5.14 As such the aim should be to meet the shortfall in affordable housing provision as soon as possible i.e. over the next five years, in line with the approach set out in the NPPG<sup>2</sup>

<sup>2</sup> Paragraph: 031 Reference ID: 68-031-20190722



for overall housing shortfalls. This approach has been supported by a number of a SoS and Inspectors appeal decisions<sup>3</sup>.

- 5.15 To clear the 1,692 dwelling shortfall accumulated between 2021/22 and 2023/24, the Council would need to deliver 1,208<sup>4</sup> net affordable dwellings per annum over the next five years (2024/25 to 2029/30), representing a 39% increase from the annual need of 870 net affordable dwellings identified in the 2021 LHNA. Without a step change in affordable housing delivery this is unlikely to be realised.

## Conclusions

- 5.16 Past delivery of affordable housing in Medway has fallen consistently and significantly short of identified needs. Since the start of the 2015 SHMA period in 2012, only 2,279 net affordable homes have been delivered, an average of 191 dwellings per annum. This represents just 23% of all net housing completions over the period and is well below the levels required to address either historical or emerging needs.
- 5.17 More recent delivery, while improved, remains inadequate. Against the benchmark set by the 2021 LHNA, just 35% of identified affordable housing need was met between 2021/22 and 2023/24, resulting in a cumulative shortfall of 1,692 affordable dwellings over the three-year period. This shortfall compounds the backlog of unmet need and adds further pressure to a system already stretched by rising numbers on the Housing Register and growing reliance on temporary accommodation.
- 5.18 The 2025 LHNA identifies an annual need for 436 net affordable homes per annum between 2024 and 2041. While this is materially lower than the 2021 LHNA figure, it remains more than double the long-term average delivery rate in Medway. At no point since 2012 has the Council delivered affordable housing at or above this level. This underscores the structural nature of the delivery gap and the need for a significant shift in both policy ambition and delivery mechanisms.
- 5.19 The evidence clearly demonstrates that historic delivery rates have consistently fallen well below identified needs and should not be used to justify lower future targets. Instead, the Local Plan must be positively prepared and forward-looking, setting ambitious and deliverable targets for affordable housing that reflect the scale of need. This will require a clear delivery strategy supported by appropriate land allocations, policy mechanisms and resourcing to facilitate a meaningful and sustained increase in affordable housing provision across the Borough.
- 5.20 The adoption of the Local Plan is fundamental to achieving this shift. Without an up-to-date adopted Plan, there is no effective framework through which affordable housing targets can be secured or delivery accelerated. Ensuring the Plan is adopted at the earliest opportunity is therefore critical to reversing historic underperformance and beginning to address the scale of unmet and growing need across Medway.

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<sup>3</sup> Appeal Refs: APP/K3415/W/24/3340089, APP/Z3445/W/24/3340094, APP/B1930/W/22/3312277, APP/C3620/W/23/3324631, APP/B3410/W/20/3245077, APP/B1930/W/20/3265925, APP/C1950/W/20/3265926 and APP/Q3115/W/19/3230827.

<sup>4</sup>  $1,692 / 5 \text{ years} = 338.4 + 870 = 1,208.4$

## 6. Market Conditions

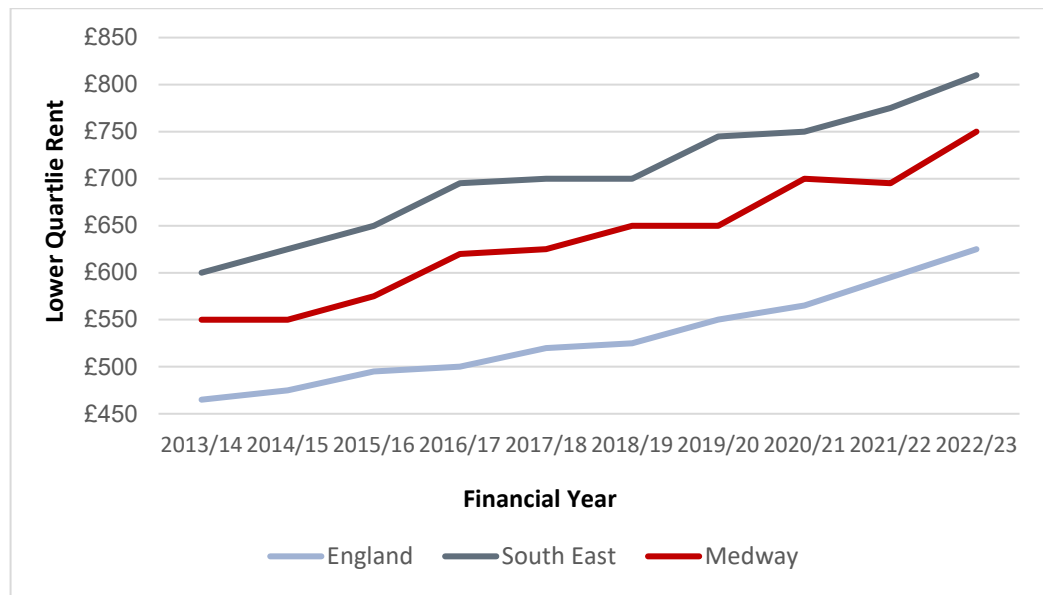
### Introduction

- 6.1 The NPPF is clear that all households whose needs are not met by the market (either to rent or to buy) are considered to be in affordable housing need. This section analyses past and current market conditions in both the rental and ownership segments of the market to understand the nature of the housing market in the Borough.

### Private Rental Market

- 6.2 The following analysis relies on Office for National Statistics (ONS) Private Rental Market Statistics (formerly produced by the Valuation Office Agency (VOA)) first published in 2013/14. The data includes both existing and new lets, meaning it may not fully reflect costs faced by new tenants in the Borough.
- 6.3 Figure 6.1 below shows the following trends in the lower quartile segment of the private rental market, representing entry-level rental prices, across the Borough between 2013/14 and 2022/23 (last produced):
- **Lower quartile rents in Medway have risen by 36% since 2013/14**, outpacing the national (34%) and South East (35%) averages, indicating sharper rent inflation at the lower end of the market.
  - **Lower quartile rents in Medway are rising more quickly in the short term**, with an 8% increase over the last year compared to 5% in both England and the South East, adding pressure on low-income households.
  - **Medway lower quartile rents now sit 20% above the national average**, up from 18% in 2013/14, showing a growing affordability gap for lower earners in the area despite still being marginally below regional levels.

Figure 6.1: Lower Quartile Private Sector Rents, 2013/14 to 2022/23



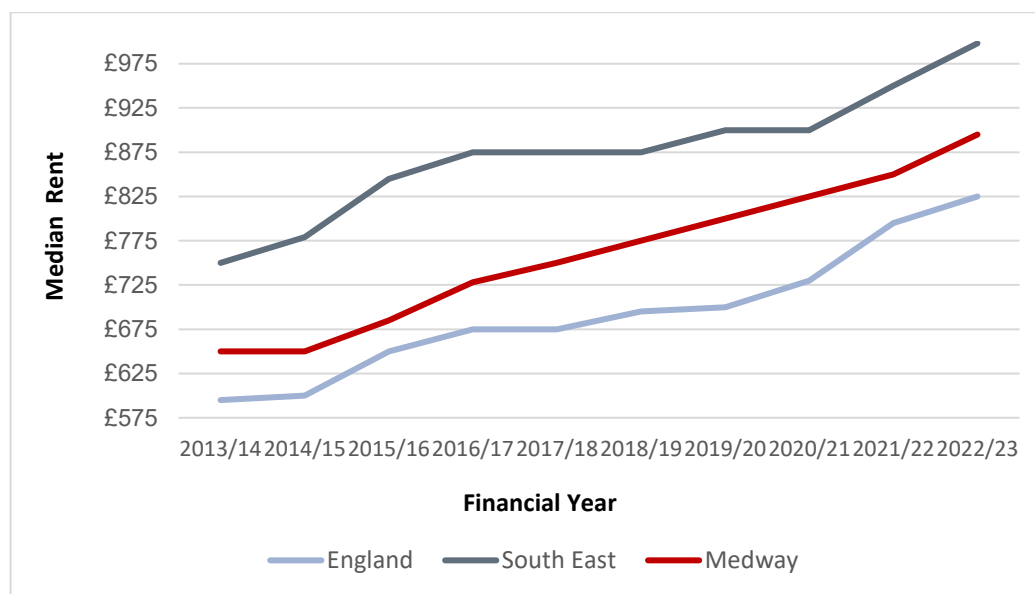
Source: VOA Open Data; and ONS Open Data.

6.4 Figure 6.2 below shows the following trends in the median segment of the private rental market, representing the midpoint of rental prices, across the Borough over the period:

- **Median rents in Medway have risen by 38% since 2013/14**, nearly matching the national increase of 39% and exceeding the South East average of 33%, indicating above-trend local rent growth.
- **Medway's rents are now 8% higher than the England median**, whereas in 2013/14 they were only 9% above — showing that while the percentage is similar, the absolute rent gap has widened from £55 to £70, signalling increasing strain on renters relative to national conditions.
- **Although still 10% below the South East average**, Medway's rents have steadily tracked regional increases, narrowing the affordability advantage that historically distinguished the area from higher-cost parts of the region.



Figure 6.2: Median Private Sector Rents, 2013/14 to 2022/23



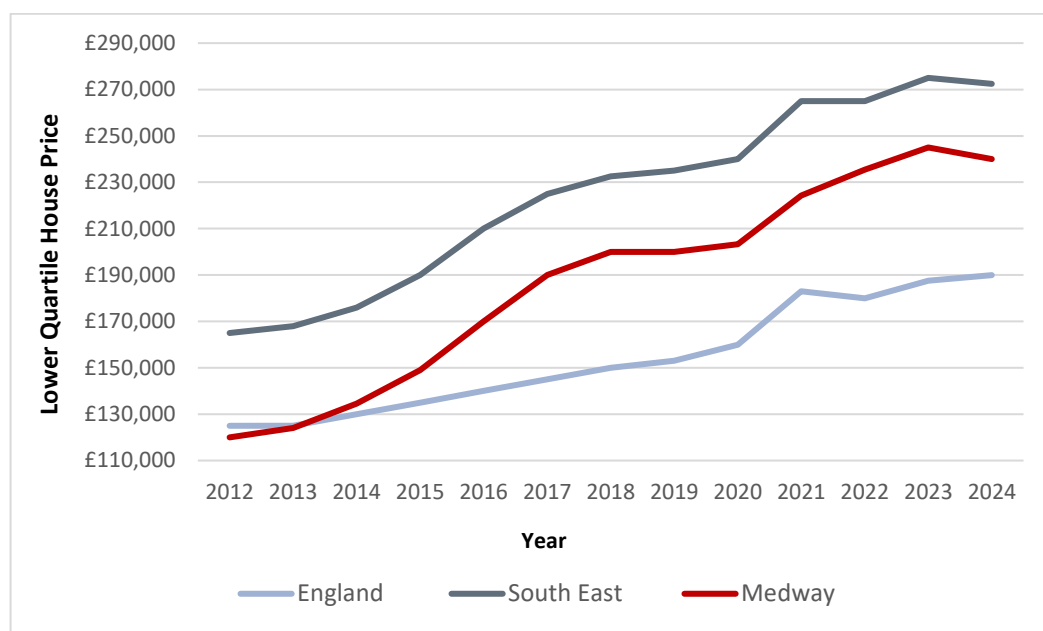
- 6.5 The private rental market in Medway has experienced sustained upward pressure over the last decade, with both lower quartile and median rents rising faster than or in line with national and regional trends. Between 2013/14 and 2022/23, lower quartile rents increased by 36%, exceeding the growth seen across England and the South East, and rising more sharply in the most recent year. This suggests mounting affordability pressures for lower-income households.
- 6.6 Median rents have followed a similar trajectory, growing by 38% over the same period and maintaining an 8% premium over the national median, with the absolute rent gap also widening. While rents in Medway remain below South East averages, the narrowing differential points to a loss of the relative affordability the Borough previously offered within the wider region. These trends underscore a growing need for affordable housing in Medway.
- 6.7 Rising rents, particularly at the lower end of the market, are placing increasing pressure on low-income households, reducing access to the private rented sector, and increasing the risk of housing instability. The erosion of Medway's historic affordability advantage relative to the South East further limits housing options for those on modest incomes. In this context, the delivery of rented affordable housing, is critical to ensuring that local housing needs are met and that vulnerable households are not priced out of the area.

### Homeownership Market

- 6.8 The ONS publishes annual house price and earnings data for affordability ratios at the lower quartile and median levels. These affordability ratios are a key component in the Standard Method calculation for determining Local Housing Need.
- 6.9 Figure 6.3 below identifies the following trends in lower quartile house prices, representing entry-level housing costs, across the Borough since the start of the 2015 SHMA period in 2012 and 2024 (last produced):

- **Lower quartile house prices in Medway have doubled since 2012**, increasing by 100% compared to 65% in the South East and 52% in England. This steep rise far outpaces both regional and national trends.
- **Medway has shifted from being more affordable to less affordable than England overall**: in 2012, lower quartile house prices in Medway were slightly below the England average; by 2024, they were 31% higher.
- **The gap between lower quartile house prices in Medway and the South East has narrowed significantly**, from a £45,000 difference in 2012 to just £32,500 in 2024 (a 28% reduction) indicating that Medway is catching up with the region's higher price levels and losing its relative affordability.

Figure 6.3: Lower Quartile House Prices, 2012 to 2024



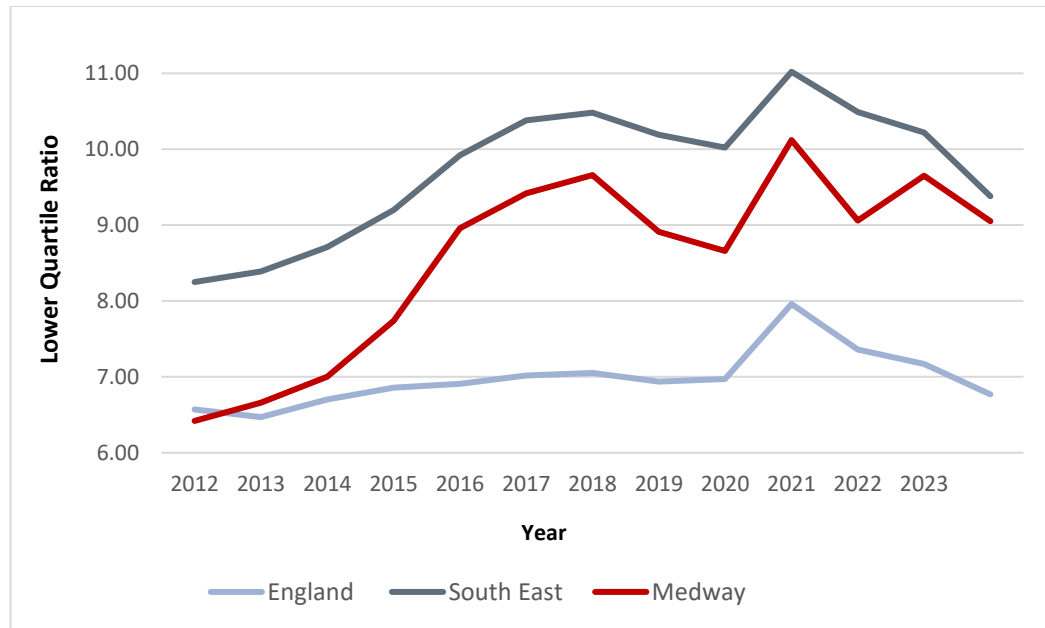
Source: ONS Open Data.

6.10 It is important to consider lower quartile house prices in context of lower quartile incomes. Figure 6.4 below compares the workplace-based lower quartile affordability ratio for Medway against regional and national averages over the period, highlighting the following trends:

- **Medway's affordability lower quartile ratio has risen by 41% since 2012**, compared to just 14% in the South East and 3% in England overall. This steep increase indicates that house prices in Medway have grown much faster than local lower quartile incomes.
- **Medway is now significantly less affordable than England overall**, with a 2024 lower quartile ratio of 9.05 compared to 6.77 nationally, a 34% higher ratio, whereas in 2012 Medway was slightly more affordable than England.

- **The affordability gap between Medway and the South East has nearly closed,** with Medway's lower quartile ratio now just 10% below the regional figure (down from 22% in 2012), showing that Medway has lost much of its previous affordability advantage.

*Figure 6.4: Lower Quartile Workplace-Based Affordability Ratio comparison, 2003 to 2024*



*Source: ONS Open Data.*

- 6.11 The homeownership market in Medway has seen a marked decline in affordability over the last decade. Since 2012, lower quartile house prices have doubled, rising at almost twice the rate of the South East and England overall. This rapid escalation has pushed Medway from a relatively affordable position to one where entry-level house prices now exceed the national average by 31%. The price gap between Medway and the South East has also narrowed substantially, highlighting the Borough's growing alignment with the region's higher-cost housing markets.
- 6.12 When viewed alongside local incomes, the affordability pressures become more pronounced. The lower quartile affordability ratio in Medway has risen by 41% since 2012, far outpacing the modest increases seen across England and the South East. In 2024, Medway's ratio stands 34% above the national average, and only 10% below the South East, indicating that it is now significantly harder for lower-income households to access homeownership in the Borough than was the case a decade ago.
- 6.13 These trends point to an urgent need for increased delivery of affordable homeownership and intermediate housing products, particularly for those priced out of the entry-level market. Without intervention, the growing affordability gap will continue to exclude lower-income residents from homeownership, undermining local housing aspirations and reinforcing socio-economic inequality in the Borough.

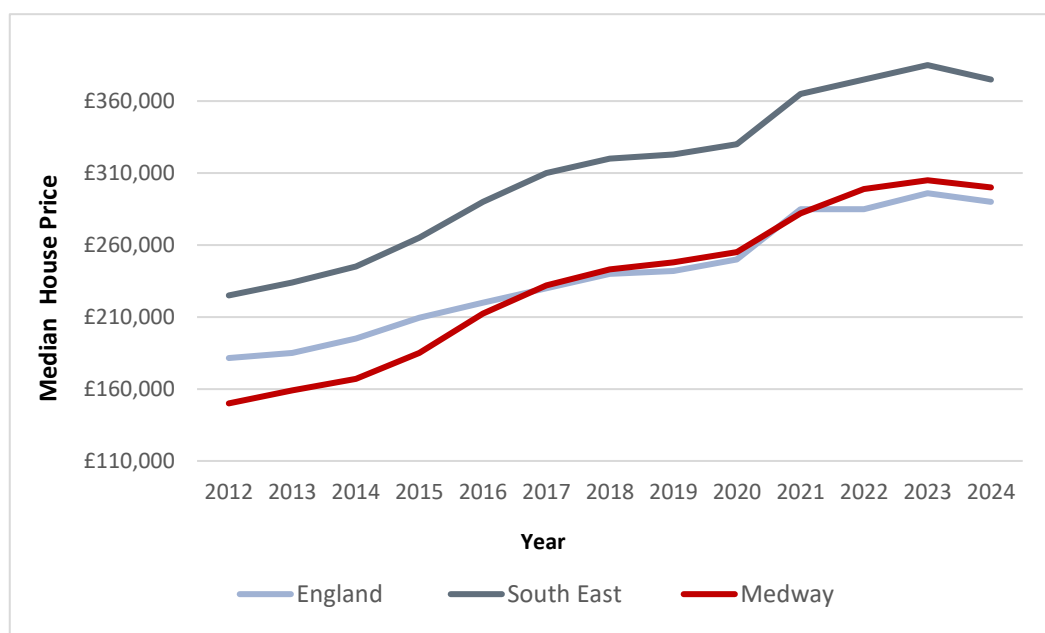


## Median House Prices

6.14 Figure 6.5 below shows trends in median house prices, representing the midpoint of the housing market across the Borough:

- **Median house prices in Medway have doubled since 2012**, rising by 100% compared to 67% in the South East and 60% in England, highlighting disproportionate local house price growth.
- **Medway has overtaken the national average**, with 2024 median prices now 3% higher than England overall — a sharp reversal from 2012 when Medway prices were 17% lower.
- **Although still below regional prices, the gap has narrowed significantly:** Medway's median house price is now only 20% below the South East average, compared to a 33% gap in 2012, signalling growing pressure on affordability in Medway.

Figure 6.5: Median House Prices, 2012 to 2024



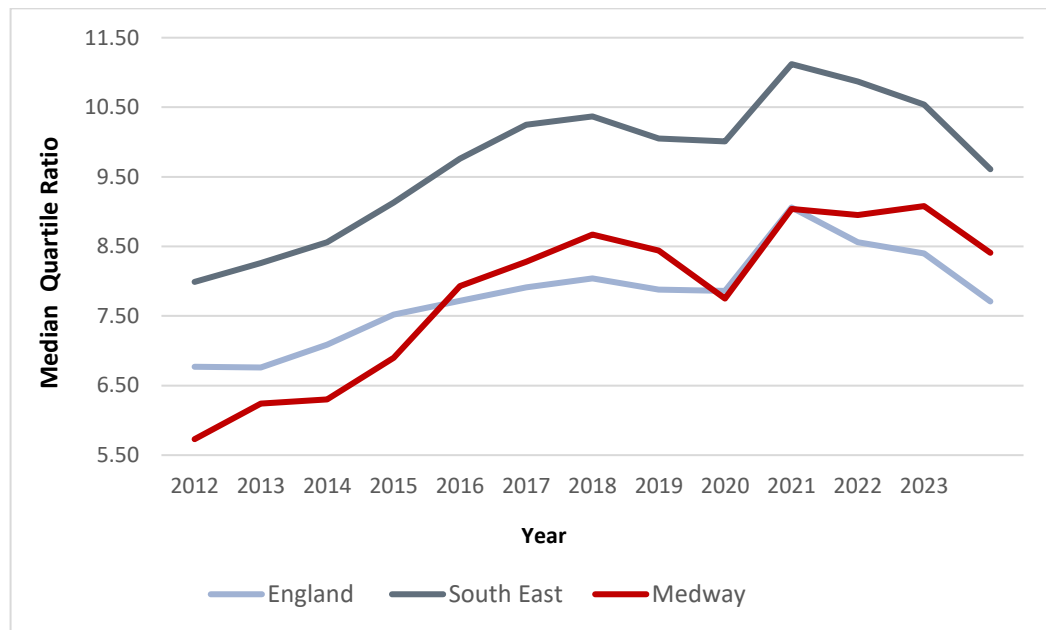
Source: ONS Open Data.

6.15 Analysing the affordability of median house prices requires placing them in the context of median incomes. Figure 6.6 below illustrates the workplace-based median affordability ratio for Medway compared to regional and national averages over the period highlighting the following trends:

- **Medway's affordability median ratio has increased by 47% since 2012**, far outpacing the rises in the South East (20%) and England (14%), indicating much faster house price growth relative to local incomes.

- **Medway is no longer an affordable outlier:** in 2012, its median ratio was significantly below both the England and South East averages; by 2024, it has caught up, sitting just 9% below the South East and matching the national average.
- **The convergence with national and regional median ratios signals a loss of affordability advantage,** as Medway now faces similar housing pressures to wider markets, despite having started from a more affordable position.

*Figure 6.6: Median Workplace-Based Affordability Ratio comparison, 2012 to 2024*



- 6.16 The median house price data for Medway illustrates a clear and sustained erosion of affordability over the past decade. Since 2012, median prices in the Borough have doubled, outpacing growth in both the South East and England. While Medway was once significantly more affordable than the national average, by 2024 it had overtaken it, with median prices now 3% higher than those in England. The price gap between Medway and the South East has also narrowed from 33% in 2012 to just 20%, indicating that Medway is increasingly reflecting the region's higher housing costs.
- 6.17 This loss of affordability is reinforced by changes in the median workplace-based affordability ratio. Medway's ratio has increased by 47% since 2012, more than double the growth seen in the South East (20%) and England (14%). Whereas Medway previously enjoyed a clear affordability advantage, by 2024 its median ratio had caught up with the national average and was only marginally below the regional figure. The data points to a significant realignment of Medway's housing market with broader regional trends, and a decline in the relative ease with which local residents can access homeownership.
- 6.18 These changes highlight a growing affordability crisis in Medway's mainstream housing market. The speed and scale of house price increases relative to incomes suggest that more households—particularly those on moderate incomes—are being excluded from ownership. This reinforces the need for a broad mix of affordable housing options, including shared ownership and other intermediate products, to support those unable

to compete in the open market and to help preserve social and economic diversity within the Borough.

## **Conclusions**

- 6.19 The analysis demonstrates a significant and sustained erosion of affordability across both the rental and homeownership sectors in Medway. In the private rental market, lower quartile rents have increased by 36% since 2013/14, outpacing national and regional trends and placing growing pressure on low-income households.
- 6.20 Rents have also increased more sharply in the short term, particularly at the lower end of the market, contributing to rising housing insecurity. This is reflected in local homelessness data, where the loss of private rented accommodation now accounts for over half (52%) of all prevention duty cases.
- 6.21 In the homeownership market, affordability pressures are even more acute. Lower quartile house prices have doubled since 2012 and median prices have risen by 100%, significantly outstripping income growth and outpacing trends seen in the South East and England.
- 6.22 As a result, Medway has shifted from being a relatively affordable area to one where both entry-level and median house prices now exceed the national average. Affordability ratios have worsened accordingly, with both lower quartile and median price-to-income ratios rising steeply and closing the gap with the more expensive South East region.
- 6.23 Taken together, these trends point to a worsening affordability crisis that is pricing out both low-income and increasingly moderate-income households from securing adequate housing in the Borough. The erosion of Medway's historic affordability advantage relative to national and regional benchmarks highlights the need for a substantial increase in the delivery of affordable housing.
- 6.24 This must include a range of tenure types, from rented affordable tenures for those in acute need to intermediate and low-cost homeownership options for households who can no longer access the open market. Without sustained intervention, these pressures will continue to restrict housing choice, deepen inequality, and undermine efforts to meet the full spectrum of housing need in Medway.
- 6.25 A timely and robust Local Plan is critical to this intervention. Adoption of the Plan will provide the strategic framework necessary to secure affordable housing at scale, guide investment in the right locations, and respond effectively to the deepening affordability pressures that are increasingly excluding local residents from both the rental and ownership markets.



## 7. Summary and Recommendations

### Introduction

- 7.1 This section draws together the key findings of the preceding analysis to provide a clear summary of the affordable housing context in Medway and the role the Pump and Bloor Farm site can play in responding to identified needs. It also sets out recommendations to guide the Council's emerging policy approach and support the allocation and delivery of the site.
- 7.2 The evidence presented throughout this Statement highlights an acute and persistent affordable housing crisis in Medway, characterised by escalating need, chronic under-delivery and worsening market conditions.
- 7.3 In this context, the allocation and timely delivery of large, well-located greenfield sites (such as Pump and Bloor Farm) capable of delivering substantial numbers of affordable homes must be treated as a matter of strategic priority. Ensuring the adoption of the emerging Local Plan is critical to provide the policy certainty needed to support and accelerate that delivery.

### Affordable Housing Offer

- 7.4 Esquire Developments is promoting land at Pump and Bloor Farm, Rainham for allocation in the emerging Local Plan. The site is currently subject to draft allocation under Policy SA10 and is capable of delivering up to 750 homes, including:
- **Up to 225 affordable dwellings (30%)** in line with emerging Policy T3;
  - **An additional up to 15 dwellings** to be made available for use as temporary accommodation.
- 7.5 The proposed tenure mix of 40% social rent, 25% affordable rent and 35% shared ownership directly reflects the proportions identified in the 2025 LHNA and ensures alignment with both the evidence base and draft policy expectations.
- 7.6 Importantly, the site's scale enables the delivery of a balanced housing mix, with a range of affordable tenures and dwelling sizes. The site is deliverable, well-connected, and can make a significant contribution to addressing the affordable housing crisis in Medway, including through the provision of high-quality temporary accommodation to help relieve current pressures on emergency housing services.

### Summary of Key Findings

- 7.7 The analysis presented in this Statement identifies a severe affordable housing shortfall in Medway, driven by five critical factors:
1. **Weak Policy Framework:** The adopted Local Plan is more than 20 years old and lacks a clear target or updated definitions. The emerging Local Plan shows intent but omits key elements, including a formal housing requirement, borough-wide

affordable housing target, spatial definition of value areas, and a monitoring framework.

2. **High and Unmet Need:** The 2025 LHNA identifies a need for 436 net affordable homes per annum to 2041. This follows the 2021 LHNA which identified a much higher need of 870 affordable homes per annum. The variance stems largely from differing affordability thresholds, with the 2025 assessment adopting a higher 35% threshold which underestimates real-world need. Indicators such as the Housing Register, long waiting times, temporary accommodation use, and rising homelessness all point to a worsening position.
3. **Persistent Under-Delivery:** Net affordable housing completions have averaged just 191 dwellings per annum since 2012. Over the past three years (2021–2024), only 35% of affordable housing need identified in the 2021 LHNA has been met, resulting in a cumulative shortfall of 1,692 homes. Delivery has never met the 2025 LHNA benchmark of 436 net affordable homes per annum.
4. **Escalating Pressure on Frontline Housing Services:** Demand for affordable housing is placing increasing pressure on frontline services. The number of households on the Housing Register has grown by 60% since 2021. The number of households in temporary accommodation has risen by 60% since 2022, with over 850 children now living in temporary housing. At the same time, over 1,800 households were owed prevention or relief duty in 2023/24. These indicators reveal the real-world consequences of insufficient affordable housing supply and reinforce the urgency of action.
5. **Market Pressures:** Both private rents and house prices have increased sharply. Lower quartile rents are up 36% since 2013/14 and lower quartile house prices have doubled since 2012. As a result, Medway has moved from being relatively affordable to unaffordable compared with national averages. Entry-level homeownership is now beyond reach for many, reinforcing the need for affordable rent and intermediate products.

## Recommendations

- 7.8 In order to ensure that the emerging Local Plan is positively prepared, effective, and consistent with national policy, the following recommendations are made:
1. **Embed the Housing Requirement in Policy:** The Local Plan should include a formal housing requirement figure expressed as a minimum figure for the plan period within a strategic policy. This ensures clarity for decision-makers and consistency with national expectations for plan soundness.
  2. **Introduce a Borough-Wide Affordable Housing Target:** A clearly defined borough-wide affordable housing target should be set within a strategic policy, expressed as a minimum figure over the plan period. This will provide clarity, support site allocations and development management decisions, and enable effective monitoring.

3. **Ensure the Definition of Affordable Housing Reflects National Policy:** To ensure the Plan is robust and future-proof, the definition of affordable housing included within the draft Plan should be updated to explicitly reference the NPPF definition, including a clear allowance for any future updates to national policy. This will ensure continued consistency with national guidance over the lifetime of the Plan and avoid reliance on outdated or superseded terminology (such as the current reference to 'starter homes' in the draft Plan).
4. **Define the Spatial Extent of Value Areas in Policy T3:** The geographical boundaries of the 'value areas' referenced in Policy T3 must be clearly set out on a map of the Borough in the Plan or an accompanying appendix. Without this, applicants cannot determine which policy requirement applies, undermining the effectiveness of the policy.
5. **Clarify the Role of Local Connection Criteria:** Policy T3 should be revised to ensure that the use of local connection cascades does not override the objective of meeting identified housing need. Allocations should prioritise those in greatest need across the Borough, in line with the NPPF's social objectives.
6. **Publish a Comprehensive Monitoring Framework:** The Plan must include or be supported by a monitoring framework setting out specific indicators for affordable housing delivery, including:
  - Net annual completions; and
  - Progress against identified need.

This is essential for assessing effectiveness and triggering corrective action if targets are not being met.

7. **Prioritise Early Delivery and Plan Adoption:** Large sites such as Pump and Bloor Farm should be prioritised for early delivery given their capacity to meet policy-compliant affordable housing targets and reduce reliance on costly temporary accommodation. To enable this, it is essential that the emerging Local Plan is progressed to adoption without further delay. Adoption will provide the necessary framework to unlock delivery and ensure the borough can begin to meaningfully tackle its unmet affordable housing need.



## **Appendix AH1: Freedom of Information Response**

Response contained overleaf.

## **Housing Register**

### **1. The total number of households on the Housing Register on 31 March 2024:**

5536

### **2. The total number of households with active applications pending acceptance onto the Housing Register on 31 March 2024:**

We are unable to provide this information as we do not hold this data retrospectively. Our System HUUME is a live system, and we are unable to go back to this period and determine the exact number of applicants waiting to be assessed.

### **3. How often the Council reviews the Housing Register to remove ineligible applicants:**

The council does not review the housing register to remove ineligible applicants these are identified by individual staff and through fraud initiatives. When there is an update to the allocations policy a review is carried out.

### **4. The average waiting times for households to be housed between 1 April 2023 and 31 March 2024 for the following types of affordable property:**

I can confirm that the council holds information that you have asked for, however, because the cost of complying with your request would exceed the limit set by the Freedom of Information Act, on this occasion your request will not be processed further. This letter explains why that is the case and also provides you with some advice as to how you could refine your request so that we may be able to answer it.

Although the Council aim to be transparent and accountable to the public, we must weigh this against the significant amount of officer time that would be used in dealing with such large requests.

Section 12 of the Freedom of Information Act 2000 (FOI) makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit, which for local government is set at £450. This represents the estimated cost of one person spending 18 working hours in determining whether the department holds the information, locating, retrieving and extracting the information.

There were 714 let on Kent Homechoice between 1 April 2023 and 31 March 2024. We do not categorise whether a property is affordable rent or social rent other than in the advert itself which would mean we would need to individually interrogate 714 adverts to review the rent type. I estimate this would take around 3 minutes per property.

$714 \times 3 = 2142/60 = 35.7$  Hours. We therefore estimate that it will take us in excess of 18 working hours to determine appropriate material and locate, retrieve and extract the information in reference to your request.

Under Section 16 of the FOI there is a duty on all public authorities to provide advice and assistance. Although we cannot answer your request at the moment, we might be able to answer a refined request within the cost limit. You may wish to consider, for example, *requesting information on the total number of properties let over this period of time for all rent types not specifically affordable rents.*

Please be aware that we cannot guarantee at this stage that a refined request will fall within the FOIA cost limit. Please bear in mind that you should identify the information that you want as clearly and concisely as possible.

Type of affordable property	Average Waiting Times (2023/24)
1-bed affordable property	
2-bed affordable property	
3-bed affordable property	
4+ bed affordable property	

5. The number social housing re-lets (a property that becomes available for a new tenant when a previous tenant vacates it) between 1 April 2023 and 31 March 2024:

I can confirm that the council holds information that you have asked for, however, because the cost of complying with your request would exceed the limit set by the Freedom of Information Act, on this occasion your request will not be processed further. This letter explains why that is the case and also provides you with some advice as to how you could refine your request so that we may be able to answer it.

Although the Council aim to be transparent and accountable to the public, we must weigh this against the significant amount of officer time that would be used in dealing with such large requests.

Section 12 of the Freedom of Information Act 2000 (FOI) makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit, which for local government is set at £450. This represents the estimated cost of one person spending 18 working hours in determining whether the department holds the information, locating, retrieving and extracting the information.

**There were 714 let on Kent Homechoice between 1 April 2023 and 31 March 2024. We do not categorise whether a property is a re-let or not which would need us to individually interrogating 714 adverts to review if they were a new property or had been previously relet. I estimate this would take around 3 minutes per property.**

**714 x 3 = 2142/60 = 35.7 Hours**

We therefore estimate that it will take us in excess of 18 working hours to determine appropriate material and locate, retrieve and extract the information in reference to your request.

Under Section 16 of the FOI there is a duty on all public authorities to provide advice and assistance. Although we cannot answer your request at the moment, we might be able to answer a refined request within the cost limit. **You may wish to consider, for example, requesting information on the total number of properties let over this period of time.**



Please be aware that we cannot guarantee at this stage that a refined request will fall within the FOIA cost limit. Please bear in mind that you should identify the information that you want as clearly and concisely as possible.

I trust this information is to your satisfaction, however, if you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to: Information Governance Manager, Medway Council, Gun Wharf, Dock Road, Chatham, Kent, ME4 4TR., or email [freedom@medway.gov.uk](mailto:freedom@medway.gov.uk).

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

6. The total number of households on the Housing Register on 31 March 2024 specifying the following locations as a preferred choice:  
Kent Homechoice does not break down the areas of preference to individual wards only by town e.g Chatham, Rochester, Gillingham. We would be unable to provide the below information as it is not held on our systems.

Location	Household Preferences (31 March 2024)
Rainham North Ward	
Twydall Ward	
Gillingham North Ward	
Watling Ward	

7. The number of properties advertised and the average number of bids per property between 1 April 2023 and 31 March 2024 in the following locations:

I can confirm that the council holds information that you have asked for, however, because the cost of complying with your request would exceed the limit set by the Freedom of Information Act, on this occasion your request will not be processed further. This letter explains why that is the case and also provides you with some advice as to how you could refine your request so that we may be able to answer it.

Although the Council aim to be transparent and accountable to the public, we must weigh this against the significant amount of officer time that would be used in dealing with such large requests.

Section 12 of the Freedom of Information Act 2000 (FOI) makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit, which for local government is set at £450. This represents the estimated cost of one person spending 18 working hours in determining whether the department holds the information, locating, retrieving and extracting the information.

**There were 714 let on Kent Homechoice between 1 April 2023 and 31 March 2024. We do not categorise whether properties based on ward areas only general location. We**

would need to review each advert and filter to location and cross reference with a ward map then calculate the average. With 714 adverts to review I estimate this would take around 5-10 minutes per property.

$$714 \times 5 = 3570/60 = 59.5 \text{ Hours}$$

We therefore estimate that it will take us in excess of 18 working hours to determine appropriate material and locate, retrieve and extract the information in reference to your request.

Under Section 16 of the FOI there is a duty on all public authorities to provide advice and assistance. Although we cannot answer your request at the moment, we might be able to answer a refined request within the cost limit. **You may wish to consider, for example, requesting information on each specific town such as Rainham, Gillingham or Rochester rather than ward specific.**

Please be aware that we cannot guarantee at this stage that a refined request will fall within the FOIA cost limit. Please bear in mind that you should identify the information that you want as clearly and concisely as possible.

Type of affordable property	Rainham North Ward		Twydall Ward	
	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property
1-bed affordable property				
2-bed affordable property				
3-bed affordable property				
4+ bed affordable property				
<b>Totals</b>				

**8. Any changes made to the Housing Register Allocations Policy since 2011, including:**

- **Dates each new/ amended Allocations Policy was published;**  
22 October 2012  
1 August 2018
- **Dates each new/ amended Allocations Policy was implemented;**  
1 August 2013  
2019
- **Description of the changes in each new/ amended Allocations Policy;**  
Introduction of the inactive register in Medway – For further changes please review the policy below  
The banding awarded to those seeking sheltered properties was lowered to a Band D and further removal reasons were added to the register, - For further changes please review the policy below
- **Copies of each new/ amended Allocations Policy published.**

<file:///C:/Users/Andrew.elliott/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/9OIMYJU2/Allocations%20Policy%202012.pdf>

[https://www.medway.gov.uk/downloads/file/1509/allocations\\_policy](https://www.medway.gov.uk/downloads/file/1509/allocations_policy)

### **Temporary Accommodation**

#### **9. The number of households housed in temporary accommodation by the Council within and outside the Local Authority area on the following dates:**

Due to changing to a new IT system in July 2023 all data held is now currently live data which means we cannot retrospectively look at data specific to one day.

Temporary Accommodation Location	31 March 2023	31 March 2024
Households Housed within the Local Authority area		
Households Housed outside the Local Authority area		
<b>Total Households</b>		

#### **10. The number of households housed in temporary accommodation within the Local Authority area by other Council's on the following dates:**

Whilst we do hold the information of all Section 208 notifications that have been sent to us advising of a placement within Medway we are not informed when these placements leave and therefore cannot provide an accurate figure to these total households. We can advise that between

01/04/2022 - 31/03/2023 we received 836 s208 notifications

01/04/2023 - 31/03/2024 we received 475 s 208 notifications

Date	Total Households
31 March 2023	
31 March 2024	

### **Housing Completions**

#### **11. The number of NET<sup>1</sup> housing completions<sup>2</sup> and affordable housing<sup>3</sup> completions in Rainham North Ward over the following monitoring years (1 April to 31 March):**

Monitoring Year	Housing Completions (Net)	Affordable Housing Completions (Net)
2006/07	SEE BELOW	NOT HELD
2007/08		NOT HELD
2008/09		NOT HELD
2009/10		NOT HELD

<sup>1</sup> Net refers to total (gross) completions minus any losses to stock through demolitions.

<sup>2</sup> A housing completion refers to a newly constructed or converted dwelling that is ready for occupation.

<sup>3</sup> As defined by Annex 2 of the National Planning Policy Framework (2024) which can be viewed [here](#).



2010/11		NOT HELD
2011/12		11
2012/13		0
2013/14		0
2014/15		27
2015/16		0
2016/17		0
2017/18		0
2018/19		0
2019/20		0
2020/21		64
2021/22		
2022/23		
2023/24		
<b>Totals</b>		

The net completions data by ward is all publicly available in Medway's authority monitoring reports.

[https://www.medway.gov.uk/downloads/download/24/authority\\_monitoring\\_report](https://www.medway.gov.uk/downloads/download/24/authority_monitoring_report)

For each year, it can be found in Volume 2, chapter 4, section 1 – completions by ward

I trust this information is to your satisfaction, however, if you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to: Information Governance Manager, Medway Council, Gun Wharf, Dock Road, Chatham, Kent, ME4 4TR., or email [freedom@medway.gov.uk](mailto:freedom@medway.gov.uk).

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

[REDACTED]

---

**From:** enquiries, housing <housing.enquiries@medway.gov.uk>  
**Sent:** 29 April 2025 15:00  
**To:** Annie Gingell  
**Subject:** RE: INF003234

Good afternoon Ms Gingell,

Yes you are correct, the metric used in Q4 is days.

Thank you.

[REDACTED] | **Housing Apprentice** | Strategic Housing & Partnership| Medway Council Gun Wharf, Dock Road Chatham ME4 4TR

Web: [medway.gov.uk](https://medway.gov.uk) | Twitter: @medway\_council | Facebook: Medway Council



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**From:** [REDACTED]  
**Sent:** 28 April 2025 10:28  
**To:** enquiries, housing <housing.enquiries@medway.gov.uk>  
**Cc:** [REDACTED]  
**Subject:** RE: INF003234

Good morning,

Thank you for the below response.

Could you please confirm the metric used in Question 4, I'm assuming its days?

Best,

Annie

**Annie Gingell**  
Associate Director

We are a CarbonNeutral® certified company.

We support blended flexible working which means that co-owners will respond to you during their working hours and we appreciate that you will respond during your working hours.

Our co-owners are contactable in the usual ways and we suggest using mobile numbers in the first instance.



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**From:** enquiries, housing <[housing.enquiries@medway.gov.uk](mailto:housing.enquiries@medway.gov.uk)>

**Sent:** 23 April 2025 11:39

**To:** [REDACTED]

**Subject:** INF003234

Good morning Ms Gingell,

Apologies for the delay in providing this information to you.

I believe you spoke to our colleague last week, who sought some clarification on your request.

We can now provide you with the following information on the 3 questions you requested:

## Question 4

You clarified that by affordable properties, you meant properties on the social housing register.

*Please add in table here for average waiting time 1 April 2023 and 31 March 2024*

Type of affordable property	Average Waiting Times (2023/24)
1-bed affordable property	611
2-bed affordable property	631
3-bed affordable property	1154
4+ bed affordable property	1228

## Question 5

You clarified on the phone to a colleague that you are looking for information about the number of people who have moved into a property that were not already an existing social housing tenant.

Due to the way our register is maintained, this would require someone to go through each case individually and review the person's address history and make additional checks regarding if the previous address was a social tenancy. In the year 2023-2024 we let 623 properties via the housing register, and not all of these are Medway Council stock. To interrogate each case, this would take approximately 3 minutes, and in some cases more.

$623 \times 3/60 = 31.15$  Hours



We do however hold information about our own stock and can provide this information however, confirm that the response to this request has been refused under section 21 of the Freedom of Information Act (2000). Section 21 of the Freedom of Information Act, applies to information that can be accessed through other means. In this instance the information you have requested is available and can be found online via the Local Authority Housing Statistics Returns.

The tables for 2023-2024 can be found here: <https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2023-to-2024> . For this information you would need to view tab D, columns L - O.

## Question 11

Apologies for not completing the table in full the first time round - the correct table should read:

Monitoring Year	Housing Completions (Net)	Affordable Housing Completions (Net)
2006/07	SEE BELOW	NOT HELD
2007/08		NOT HELD
2008/09		NOT HELD
2009/10		NOT HELD
2010/11		NOT HELD
2011/12		11
2012/13		0
2013/14		0
2014/15		27
2015/16		0
2016/17		0
2017/18		0
2018/19		0
2019/20		0
2020/21		64
2021/22		30
2022/23		55
2023/24		62
<b>Totals</b>		

Kind Regards ,

**[REDACTED]** | **Housing Apprentice** | Strategic Housing & Partnership| Medway Council Gun Wharf, Dock Road Chatham ME4 4TR

Web: [medway.gov.uk](https://www.medway.gov.uk) | Twitter: @medway\_council | Facebook: Medway Council



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## Appendix AH2: Data Tables

Table 1: Gross Additions to Affordable Housing Stock, 2012/12 to 2023/24

Monitoring Period	Total Housing Completions (net)	Gross Additions	Gross additions as a %age of total completions
2012/13	653	227	35%
2013/14	584	170	29%
2014/15	491	173	35%
2015/16	561	189	34%
2016/17	654	95	15%
2017/18	693	112	16%
2018/19	657	167	25%
2019/20	1,142	305	27%
2020/21	1,087	70	6%
2021/22	1,103	349	32%
2022/23	960	209	22%
2023/24	1,303	387	30%
<b>Totals</b>	<b>9,885</b>	<b>2,453</b>	<b>25%</b>
<b>Avg. Pa.</b>	<b>824</b>	<b>204</b>	<b>25%</b>

Source: MHCLG Open Data

Table 2: Net Additions to Affordable Housing Stock, 2012/13 to 2023/24 (detailed)

Monitoring Year	Total Housing Completions (net)	Gross Additions	LPA Right to Buy Sales	RP Right to Buy Sales	Net Additions	Net additions as a %age of total completions
2012/13	653	227	6	7	214	33%
2013/14	584	170	10	1	159	27%
2014/15	491	173	15	1	157	32%
2015/16	561	189	9	9	171	30%
2016/17	654	95	19	4	72	11%
2017/18	693	112	12	2	98	14%
2018/19	657	167	11	1	155	24%
2019/20	1,142	305	17	1	287	25%
2020/21	1,087	70	4	0	66	6%
2021/22	1,103	349	12	1	336	30%
2022/23	960	209	10	1	198	21%
2023/24	1,303	387	3	0	384	29%
<b>Total</b>	<b>9,885</b>	<b>2,453</b>	<b>128</b>	<b>28</b>	<b>2,297</b>	<b>23%</b>
<b>Avg. Pa.</b>	<b>824</b>	<b>204</b>	<b>11</b>	<b>2</b>	<b>191</b>	<b>23%</b>

Source: MHCLG Open Data



Table 3: Net Additions to Affordable Housing Stock, 2012/13 to 2023/24 (summary)

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2012/13	227	13	214
2013/14	170	11	159
2014/15	173	16	157
2015/16	189	18	171
2016/17	95	23	72
2017/18	112	14	98
2018/19	167	12	155
2019/20	305	18	287
2020/21	70	4	66
2021/22	349	13	336
2022/23	209	11	198
2023/24	387	3	384
<b>Totals</b>	<b>2,453</b>	<b>156</b>	<b>2,297</b>
<b>Avg. Pa.</b>	<b>204</b>	<b>13</b>	<b>191</b>

Source: MHCLG Open Data

Table 4: Net Additions Compared to Needs Identified in the 2015 SHMA, 2012/13 to 2023/24

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2012/13	214	721	-507	-507	30%
2013/14	159	721	-562	-1,069	22%
2014/15	157	721	-564	-1,633	22%
2015/16	171	721	-550	-2,183	24%
2016/17	72	721	-649	-2,832	10%
2017/18	98	721	-623	-3,455	14%
2018/19	155	721	-566	-4,021	21%
2019/20	287	721	-434	-4,455	40%
2020/21	66	721	-655	-5,110	9%
2021/22	336	721	-385	-5,495	47%
2022/23	198	721	-523	-6,018	27%
2023/24	384	721	-337	-6,355	53%
<b>Total</b>	<b>2,297</b>	<b>8,652</b>	<b>-6,355</b>		<b>27%</b>
<b>Avg. Pa</b>	<b>191</b>	<b>191</b>	<b>-530</b>		

Source: MHCLG Open Data; and 2015 SHMA

Table 5: Net Additions Compared to Needs Identified in the 2021 LHNA , 2021/22 to 2023/24

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	336	870	-534	-534	39%
2022/23	198	870	-672	-1,206	23%
2023/24	384	870	-486	-1,692	44%
Total	918	2,610	-1,692		35%
Avg. Pa	306	870	-564		

Source: MHCLG Open Data; and 2021 LHNA

Table 6: Net Additions Compared to Needs Identified in the 2021 LHNA, 2021/22 to 2023/24

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	336	621	-285	-285	54%
2022/23	198	621	-423	-708	32%
2023/24	384	621	-237	-945	62%
Total	918	1,863	-945		49%
Avg. Pa	306	621	-315		

Source: MHCLG Open Data; and 2021 LHNA

**Turley Bristol Office**

40 Queen Square

Bristol

BS1 4QP

T 0117 989 7000