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MEDWAY LOCAL PLAN 2041 EXAMINATION IN PUBLIC

Matter 3 Hearing Statement – Meeting Housing Needs

Iceni Projects Limited on behalf of Barratt David Wilson Kent (“BDW”) (Representor ID: 915)

Introduction

1. This Hearing Statement has been prepared on behalf of Barratt David Wilson Kent (“BDW”) in respect of the Matters, Issues and Questions (Document ref. MLP/ED15) published as part of the Examination in Public (“EiP”) into the emerging Medway Local Plan 2041, prepared by Medway Council (“the Council”).
2. BDW is part of Barratt Redrow, the largest housebuilder in the country, delivering over 17,000 homes annually across the UK. BDW is one of the largest and most prolific developers in Kent with a proven track record of delivering significant new residential communities within the area’s most prominent and high profile key strategic locations. BDW, therefore, has unrivalled experience in delivering residential development in the Kent area.
3. BDW controls a 16Ha landholding known as “Land north of Rede Court” (Site ref. SNF1), which forms part of the draft allocation Land west of Strood under Policy SA6 and is one of the Local Plan’s most important strategic locations, upon which the spatial strategy is predicated. Based on BDW’s desire to submit an application on its landholding shortly, we believe that the Site can come forward as the first phase of development on Land west of Strood.
4. **BDW is supportive in principle of the draft Local Plan.** In this regard, BDW considers Land at Strood to be a key component of what it considers to be the only realistic spatial strategy capable of meeting Medway’s housing needs in full. BDW’s position on key questions posed by the Local Plan Inspectors is outlined in this submission.

Matter 3: Meeting Housing Needs

Housing Requirement

Q3.1: How has the housing requirement for the Plan period been assessed? What evidence underpins the housing requirement and how has national policy been applied in setting it?

5. BDW supports the Council's use of the Government's standard method to establish the minimum local housing need, in line with the Planning Practice Guidance¹ ("PPG") and paragraphs 11 and 62 of the NPPF 2024.

Q3.2: How does the Plan demonstrate that the housing requirement is realistic and deliverable in light of the constraints identified in the evidence base?

6. Whilst this is primarily for the Council to answer, BDW consider the requirement is realistic and deliverable, taking into account the evidence set out in the Sustainability Appraisal (2025), the Land Availability Assessment and other relevant documents.
7. The resilience of the requirement depends on a balanced spatial strategy that draws on urban regeneration, suburban growth and rural growth, rather than over-relying on any single source of supply. Land West of Strood via Policy SA6, is central to that resilience: it is available, it is being actively promoted, and BDW is bringing forward a planning application on Land north of Rede Court, which should be delivered as a first phase of this key allocation from 2028. The allocation therefore provides added robustness to the plan strategy should other components of supply underperform.

Q3.3: The Council states a housing requirement of 1,636 dwellings per annum to 2041 (circa. 24,540 homes). Is this the Plan's minimum requirement? How it has been set and explain how flexibility and contingency in its delivery is provided.

8. BDW's position is the housing requirement should be treated as a *minimum* requirement and not as a ceiling on sustainable delivery. This is consistent with paragraph 11 of the NPPF, under which the housing requirement is the minimum number of homes the plan seeks to provide and with the objective of significantly boosting the supply of homes (paragraphs 61).
9. Flexibility and contingency are provided by planning to meet need in full, by including a supply buffer, and by relying on deliverable strategic allocations such as Land West of Strood that can flex upwards and deliver early. BDW considers the Plan would be strengthened by a policy modification confirming the requirement is a minimum, explaining how the need will be met, and setting out the contribution Land West of Strood will make across the plan period from 2028 onwards.

Q3.5: The development proposed in the Plan is identified as meeting the full Local Housing Need and this is identified as the housing requirement figure. However, there does not appear to be a policy which sets out the housing requirement figure and identifies how the need would be met and distributed. The Council is asked to explain why this is the case.

10. BDW agrees a modification is required to clearly express via policy, the housing requirement figure and identifies how the need will be met and distributed. To be positively prepared and effective in line with paragraph 36 of the NPPF 2024, the Plan should include a clear housing requirement

¹ PPG Paragraph: 002 Reference ID: 2a-002-20241212 <https://www.gov.uk/guidance/housing-supply-and-delivery>

policy. BDW is not supportive of a stepped trajectory, in order to ensure a consistent level of delivery across the plan period, and do not consider such an approach to be justified.

11. BDW considers the Plan would be strengthened by a policy which states the requirement as a minimum, sets out the planned-for sources of supply, and explains the contribution that strategic allocations, including Land West of Strood, will make from 2028 onwards.

Housing Supply and Trajectory

Q3.6: Does the Plan clearly set out the expected, 'planned-for' sources of housing supply to meet the identified housing requirement?

12. The housing strategy includes strategic allocations to provide a substantial component of supply across the plan period, alongside pipeline (consented) sites, urban regeneration allocations and windfall. BDW supports this planned-for supply but as noted under our response to Question 3.5, considers that the sources of supply should be expressed clearly within the Plan itself.
13. Land West of Strood is a critical, clearly identified component of the strategy, and its role should be made explicit so the reader can understand how the requirement is met.

Q3.8: How does the Plan demonstrate that the housing trajectory is deliverable across the Plan period, including on strategic sites?

14. Policy SA6, Land West of Strood, is central to the effectiveness and resilience of the housing trajectory. In relation to its deliverability, and specifically Land north of Rede Court, BDW confirms the following, consistent with the definition of "deliverable" in the Glossary of the NPPF 2024 and paragraph 78:

- The allocation is available and actively promoted, with the main landowners working together with Medway and Gravesham Councils. BDW is preparing a planning application for Land north of Rede Court, which is expected to form the first phase of delivery from 2028 and make an early contribution to the five-year land supply.
- The allocation provides added robustness to the plan strategy should other components of supply (in particular longer lead-in urban regeneration sites) underperform.
- Whilst Land West of Strood (insofar as it relates to the land within Medway's administrative area) is anticipated to be delivered mostly by two volume housebuilders, there is also an SME builder with land interests, meaning it will play a proportionate role in supporting all parts of the housing market and provides delivery from more than one outlet, which supports faster build-out rates (consistent with paragraph 71 of the NPPF 2024).

15. BDW considers the trajectory would be more transparent and robust if it were set out within the Plan rather than a separate Topic Paper, and if it expressly reflected first-phase delivery of Land north of Rede Court as part of Land West of Strood from 2028.

Q3.10 How have identified constraints (environmental, highways, utilities, flood risk) been factored into site capacities and delivery timings? If they have not, why?

16. BDW supports a trajectory that realistically reflects site-specific constraints in both capacity and timing, consistent with the PPG², which requires site capacities and delivery to be informed by known constraints.
17. In the case of Land north of Rede Court as part of the wider allocation of Land West of Strood, the principal considerations, highways and access, utilities, and the relationship with the North Kent Estuary and Marshes designated sites, have been assessed within Appendix G and I (pre- and post- mitigation of the Regulation 19 Sustainability Report. The site is wholly within the Green Belt but is otherwise relatively unconstrained. There are buried services along the southern part of the site, however, these have been factored into the site capacity.
18. The site lies within Flood Zone 1, avoiding the sequential flood-risk concerns that affect other parts of Medway. Similarly, it is located at a sufficient distance from the ecological constraints which impact other areas of the plan area. Access is also achievable from Clinton Road and Beaufort Road, with initial technical work already having been undertaken, and further work in progress.
19. BDW has engaged with the adjoining landowners which make up Policy SA6 as part of the preparation of a masterplan which considers the opportunities and constraints across the wider allocation. In particular, this has looked at the landscape context of the site and how the quantum of development can be accommodated within it.
20. These factors support the early delivery of the site, alongside the indicative capacity of 360 dwellings.

Policy T2: Housing Mix

Q2 3.15 How will housing mix requirements be applied and managed on large strategic sites delivered over extended periods, and what flexibility exists within the policy framework to respond to changing housing needs and market conditions?

21. BDW broadly supports Policy T2, however seeks explicit flexibility with regards to strategies sites. Strategic allocations are delivered over extended periods, and housing needs, market conditions and viability can change materially over time. The NPPF 2024 at paragraph 63 requires the size, type and tenure of housing to reflect identified needs, but this must be applied in a way that remains effective across a plan period to 2041.
22. On large, phased strategic sites such as Land West of Strood, the housing mix should be informed by the most up-to-date evidence available at the point of application or reserved matters approval,

² Paragraph: 018 Reference ID: 3-018-20190722 <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

rather than being fixed by a rigid mix set early in the plan period that becomes outdated during delivery.

23. BDW therefore recommends Policy T2 (or its supporting text) makes clear that the required mix will be applied flexibly on strategic allocations, informed by the latest Local Housing Needs Assessment and market evidence at the relevant application stage. This is necessary for the policy to remain effective and justified throughout the plan period (as set out at paragraph 36(b) and (c) of the NPPF 2024).

Q3.16 To what extent have housing mix requirements been incorporated into the viability evidence, and what evidence demonstrates that they remain viable when considered alongside affordable housing, infrastructure contributions and other policy requirements? How will competing policy requirements be balanced where viability pressures arise?

24. The housing mix requirement must be modelled within the Local Plan Viability Assessment Update ("LPVA") (June 2025) in combination *with, and not in isolation from*, the affordable housing requirement, infrastructure contributions, and other obligations that fall on the same development. A mix requirement tested in isolation would not demonstrate soundness. This is of particular importance on Land West of Strood, which is already subject to a higher affordable housing requirement. Where a site carries the highest affordable housing burden, the headroom to absorb a prescriptive mix requirement alongside all other obligations is correspondingly reduced, and the viability evidence must positively demonstrate that the combination remains deliverable.
25. As set out in response to Question 3.15, the mix on large, phased strategic sites should be informed by the latest Local Housing Needs Assessment and prevailing market evidence at the point of application or reserved matters approval, rather than fixed early in the plan period and unable to respond to demographic change, market conditions or site-specific viability circumstances.
26. Where viability pressures arise, the mix requirement should be the flexible element, applied so as to protect the delivery of the site and its affordable housing, consistent with the emphasis on maintaining delivery (paragraph 78 of the NPPF 2024).
27. For Policy T2 to be justified and effective, the Council should confirm that the housing mix requirement has been tested cumulatively and modify the policy or supporting text to confirm flexibility for strategic allocations.

Policy T3: Affordable Housing

Q3.18 How has the need for affordable housing across Medway been identified, and what evidence supports the proposed affordable housing requirements, tenure mix and thresholds set out in the Plan?

28. BDW supports an affordable housing requirement grounded in robust evidence of need. Land West of Strood, as an early-delivering strategic site, is well placed to make a significant contribution to affordable housing need in the first part of the plan period.

29. BDW t considers that 45% provision, as set out within the LPVA Update (June 2025), is appropriate at Land West of Strood.
30. The LPVA Update (June 2025) focuses primarily on contributions of 30% affordable housing, in line with non-Green Belt allocations. Paragraph 12.53 notes that the Council is seeking Green Belt release in higher value areas and sites which are to be released from the Green Belt are to provide affordable housing contributions 15% above the existing affordable housing requirements, up to a cap of 50%. As such, it concludes that 45% affordable housing provision is to be provided on sites such as Land West of Strood.
31. However, we would also note that the LPVA Update (June 2025) provides very limited information on the viability of a higher affordable housing provision, specifically on strategic allocations and Land West of Strood.
32. It is also unclear whether the abnormal costs of delivering sites of a strategic scale have been adequately factored into the LPVA. For Land West of Strood, this relates specifically to the significant level of highways infrastructure required to support the proposals and the education provision.
33. The Council has, so far, failed to produce sufficient evidence which justifies the level of education provision required at Land West of Strood. The PPG specifically references the need to identify schools for expansion and where new schools are required to inform site-specific viability assessments to ensure that the total cumulative cost of all relevant policies is not of a scale which would make development unviable³. Without this evidence, it is not possible for the Viability Assessment to make a robust or justified assessment of the level of affordable housing which can be delivered on-site.

Q3.20 What evidence demonstrates that the affordable housing requirements are deliverable across the range of development typologies anticipated during the Plan period, including strategic allocations, regeneration sites, brownfield sites and windfall developments?

34. For affordable housing requirements to be deliverable across the full range of typologies, they must be underpinned by typology-specific viability evidence. The PPG encourages detailed assessments for key sites in the plan⁴ to ensure that plan-makers are confident that policies are realistic and deliverable⁵. BDW supports the objective of maximising affordable housing on Land West of Strood, but the deliverability of the requirement on that grey belt site must be demonstrated by site-relevant viability evidence, so that the level set does not inadvertently prejudice the early delivery on which the trajectory relies.

³ Paragraph: 007 Reference ID: 10-007-20190509 <https://www.gov.uk/guidance/viability>

⁴ Paragraph: 003 Reference ID: 10-003-20180724 <https://www.gov.uk/guidance/viability>

⁵ Paragraph: 004 Reference ID: 10-004-20190509 <https://www.gov.uk/guidance/viability>

35. As referenced in response to Question 3.18, it is not considered that the evidence adequately demonstrates that the affordable housing requirements are deliverable at Land West of Strood.

Q3.21 To what extent have affordable housing requirements been tested through the viability evidence, and what evidence demonstrates that they remain viable when considered alongside infrastructure requirements, biodiversity net gain, climate change measures and other policy obligations?

36. The LPVA Update tests the cumulative impact of policy costs, namely 30% affordable housing, 10% Biodiversity Net Gain, M4(2) accessibility, 110 l/p/d water efficiency, the Future Homes Standard (Option 1), open space, developer contributions (generally circa £17,000 per dwelling) and strategic infrastructure, against a developer's return of 17.5% and finance at 7%. On that basis, the LPVA concludes that the main greenfield typologies and the principal greenfield strategic allocations remain viable with the proposed requirements. For Land West of Strood specifically, the LPVA adopts a higher-value area sales assumption of £4,600/sqm and site-specific developer contributions of £22,531 per dwelling, and finds the site viable at the tested requirements. BDW supports the objective of maximising affordable housing on the site, but it is currently unclear if this combined exercise has been undertaken at vary levels of provision.
37. Where a higher requirement cannot be shown to be viable, Policy T3 should retain the flexibility necessary to secure the early delivery of this critical first-phase site, so that the affordable housing figure does not prejudice the delivery on which the housing trajectory relies.

Policy T9: Self-build and Custom Housebuilding

Q3.51 How does Policy T9 seek to ensure that the 430-plot need (paragraph 6.9.12) is met over the Plan period, in particular as one site is allocated (4 units)? In considering the level of need and the effectiveness of the policy, why were more site(s) not allocated?

38. It is considered that a more effective approach to delivering self-build plots would be to allocate specific plots rather than to require provision on larger sites, which are less attractive to prospective purchasers.
39. As noted in our Regulation 19 representations, the final bullet point of the policy is unsound. Policy T9 sets out that affordable housing provision is calculated on the total number of homes being delivered, including self-build plots, but these will not be accepted as part of the required affordable housing provision.
40. Affordable housing requirement on larger sites which are required to deliver self-build plots will be therefore higher than that set out in Policy T3. This approach is not adequately evidenced or justified given there is no consideration within the evidence base of the impact of this on viability. LPVA Update (June 2025) (paragraphs 8.149 (assumed incorrectly numbered) through to 10.68) only assesses the return on plots sold to the market, not to the Local Authority for affordable housing. For strategic allocations such as Land West of Strood, which requires the provision of a higher level of affordable housing alongside significant infrastructure, this is particularly pertinent.

41. The policy allows for viability evidence to be submitted to remove the provision of self-build plots, but it is not clear if this would also apply to applications already consented with self-build plots which remain unsold after 12 months and are then offered up to Medway for affordable housing, and any such evidence would unlikely be able to be submitted at the initial planning application.
42. As set out within our Regulation 19 representations, Inspectors have previously recommended modifications on such policies in order to ensure that they are consistent with national policy and therefore sound⁶.
43. From reviewing a number of self-build and custom-building policies within the South East, it is clear that Medway is an anomaly in requiring self-build and custom housebuilding plots to be offered to the local authority after a 12-month marketing period⁷. The current wording of the policy lacks flexibility and is not justified or evidenced. BDW therefore recommends that this aspect of the policy be removed in order for it to be considered sound.

Q3.52 Is a shorter timeframe for building plots (bullet point towards the top of page 102) justified and effective, as this does not seem to be a particular feature of Plan policies for other types of housing?

44. It is not considered that a shorter timeframe via condition for building self-build or custom housebuilding is considered to be justified or effective. It is unclear how permission could be granted for larger sites which include general needs housing and building plots where different timescales for implementation apply to different elements of the permission. From a legal perspective, this raised complications and implementation timeframes should be the same for general needs and building plots.

SUMMARY

45. BDW supports the Plan. However, in order to ensure the Plan can be found sound, the following modifications are considered necessary:
- Include a policy which expresses the **housing requirement** as a minimum, identifies how the need will be met and distributed, confirms that a stepped trajectory is not applied, and sets out the contribution of Land West of Strood from 2028 onwards.
 - Clearly sets out the planned-for sources of supply and the housing trajectory within the Plan itself, expressly reflecting first-phase delivery of Land north of Rede Court as part of Policy SA6 from 2028.

⁶ West Suffolk Local Plan: Main Modification and Spelthorne Local Plan: Main Modification (MM53) which removed self-build plots being offered to the Council or a Housing Association before returning to the developer on the basis that it was not sound.

⁷ Maidstone Local Plan Review 2021-2038 (March 2024) – Policy LPRHOU9; Folkestone and Hythe Places and Policies Local Plan (2020) – Policy HB4; Ashford Local Plan 2030 (February 2019) – Policy HOU6. Waverley Local Plan Part 2: Site Allocations and Development Management Policies (March 2023) – Policy DM36.

- Amend Policy T2 to confirm that the required mix will be applied flexibly on strategic allocations, informed by the most up-to-date Local Housing Needs Assessment and market evidence at the point of application or reserved matters, and that the mix is the flexible element where viability pressures arise.
- Amend Policy T3 to confirm 45% affordable housing is expected on land released from the Green Belt, supported by site-specific viability evidence for Land West of Strood which properly accounts for the higher requirement, strategic highways infrastructure and education provision, and retain flexibility where a higher requirement cannot be shown to be viable.
- Delete the requirement for unsold plots to be offered to the Council after a 12-month marketing period under Policy T9, and the final bullet point excluding self-build plots from the affordable housing calculation, and remove the shorter implementation timeframe applied to building plots.