
MATTER 3: MEETING HOUSING NEEDS

1. Stantec is instructed by Taylor Wimpey Strategic Land to prepare and submit a Hearing Statement towards the Medway Local Plan in relation to Land West of Hoo, proposed to be allocated for development in Policy SA8 (site ref: HHH8).
2. This hearing statement expands on issues raised in representations submitted to the Regulation 19 consultation by Taylor Wimpey Strategic Land (ref: E181) and the Hoo Consortium (ref: E184) that included Taylor Wimpey at that time. For clarity, in 2025 Taylor Wimpey withdrew from the Hoo Consortium.
3. For context to the ongoing application and appeal on the Site, the planning application (ref: MC/24/2022) was validated in October 2024. Taylor Wimpey submitted an appeal (ref: 6004418) against non-determination and the appeal start date was 18th February 2026. An Inquiry took place in late June and early July 2026, and the appeal decision is currently awaited.
4. This Hearing Statement relates to Matter 3: Meeting Housing Needs. Taylor Wimpey have expressed their intention to participate in the Hearing Sessions for this topic in support of the allocation of the Site.

Housing Requirement

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?

5. As we address in responding to Q3.12-3.15 relating to Policy T2: Housing Mix, as set out in Taylor Wimpey's responses to the Regulation 19 consultation, there are significant concerns regarding the viability evidence underpinning the Local Plan. This raises significant concern over deliverability and therefore the soundness of the Plan.

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.

6. Taylor Wimpey supports the Council seeking to meet its housing (and other development) needs in full, as stated in Policy S1 of the Local Plan. As submitted, the Local Plan states that it will meet the housing requirement of 1,636 homes per annum which is consistent with the local housing need

figure for the area, based at March 2025. In accordance with national planning policy and guidance, this is a minimum to be met and should be the starting point. However, the Local Plan does not include any policy which includes a housing requirement that the Council will seek to meet over the plan period. Instead, the Local Plan simply refers to the calculation of housing need as of March 2025 (see paras 1.3.5 and 6.1.2).

7. As stated in our Matter 2 statement, for the Local Plan to be sound, it should be modified to include a new strategic policy that expressly sets out the housing requirement that the Local Plan seeks to meet and for this to be a “minimum”.
8. With regard to flexibility and contingency, paragraph 1.3.6 of the Local Plan identifies the sources of supply to meet the requirement. These total 24,540 homes, the same quantum as the requirement. Thus, the Local Plan has no flexibility or contingency and is therefore not effective or consistent with national policy. To address this deficiency, the Local Plan should be modified to include the development capacity of allocated sites being expressed as minimums and potentially increased, alongside the allocation of additional housing land supply.

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.

9. We have commented on this issue in our response to Q3.3 above and refer also to our response to Taylor Wimpey’s response to the Regulation 19 consultation.

Q3.7 With regard to meeting housing need through an identified supply of land, particularly over the first five years of the Plan period, we note that the proposed housing trajectory appears to be outside of the Plan and is, in fact, within a separate Topic Paper (ref: B22.5). Why is this?

10. Having regard to paragraph 78 of the NPPF, Taylor Wimpey considers that the housing trajectory is an important component of demonstrating that the plan is effective and deliverable. It should provide a clear indication of how the identified housing requirement is expected to be met over time and should establish the relationship between the housing requirement, the identified supply of land, the timing of development and the anticipated rate of delivery.

-
11. Taylor Wimpey recognises that the detailed evidence supporting a Local Plan will sit outside the plan itself. However, the absence of any housing trajectory from the Local Plan (particularly when this is alongside the absence of a housing requirement contained within a policy in the Local Plan) means that there is no clear indication how the housing requirement is expected to translate into actual housing delivery over the plan period. Having regard to the acute housing supply challenges in the area – with persistent under-delivery over a sustained period of time – it is important that the Local Plan and the sites proposed to be allocated within it, are brought forward for delivery at the earliest opportunity.
 12. This is particularly relevant to strategic allocations, where substantial infrastructure requirements or other dependencies may affect the timing of first completions and the subsequent rate of delivery. Indeed, at the time of writing, Taylor Wimpey is awaiting an appeal decision Land West of Hoo (allocation site ref: HHH8) which, if approved, will enable the timely delivery of this site in accordance with the Council's Topic Paper (B22.5).
 13. In Taylor Wimpey's view, the plan would be strengthened by including, or expressly incorporating by reference, a housing trajectory showing the anticipated delivery of housing against the plan's requirement. This should identify the expected contribution from existing commitments, strategic allocations, other allocations and any allowance for windfall development. Importantly, and consistent with the Topic Paper, no stepped trajectory is proposed which is supported by Taylor Wimpey.
 14. The trajectory should also demonstrate sufficient headroom above the minimum housing requirement to provide resilience against non-delivery. Where delivery assumptions depend upon particular sites coming forward within specified periods, the Council should demonstrate that those assumptions are supported by robust evidence and are realistic.
 15. Finally, the housing trajectory should also be informed by up-to-date evidence of infrastructure delivery, demonstrating that the timing of delivery of development is realistic having regard to the phasing of infrastructure. This will be consistent with the Plan's objectives of being infrastructure led and to demonstrate that the strategy is justified and effective. At this stage, Taylor Wimpey do not consider the evidence base adequately demonstrates that the strategic allocations and supporting infrastructure will be delivered as anticipated.

Policy T3: Affordable Housing

Q3.12 How has the Local Housing Needs Assessment (LHNA) informed the Plan's approach to housing mix, and what evidence demonstrates that the proposed mix of dwelling sizes, types and tenures reflects identified housing needs, demographic change and projected household formation throughout the Plan period?

Q3.13 What evidence demonstrates that the proposed housing mix requirements will remain appropriate throughout the Plan period to 2041, including in relation to an ageing population, specialist housing needs and potential changes in demographic or economic circumstances?

Q3.14 What evidence demonstrates that the proposed housing mix requirements are deliverable across strategic allocations, brownfield regeneration sites and windfall developments, and have developers, housebuilders and registered providers been engaged in testing the proposed approach?

Q3.15 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?

16. Taylor Wimpey supports the use of the Local Housing Needs Assessment (LHNA) and other relevant evidence to inform the plan's approach to housing mix. However, given the Plan period extends to 2041, the policy should have sufficient flexibility embedded within it to allow the most appropriate mix to be determined having regard to the circumstances at the time a site is brought forward.
17. The LHNA provides an appropriate starting point, but housing needs will inevitably change over the Plan period. The policy should therefore allow the appropriate mix to be informed by, amongst other matters, the specific circumstances of the site, the latest evidence of housing need, market demand, viability, deliverability and the anticipated phasing of development.
18. This is particularly relevant to strategic allocations which will be delivered over an extended period. The mix appropriate when a site first comes forward may not remain appropriate for later phases, and the policy should enable the mix to be reviewed as development progresses and evidence is updated.
19. This is especially important at Hoo, which is distinct from much of the existing urban area of Medway and where the Plan seeks to deliver significant transformational change. The scale and nature of

growth is likely to alter the demographic profile of the area and, consequently, the types and sizes of homes required. The housing mix appropriate at the beginning of the plan period may therefore differ from that required towards 2041.

20. Taylor Wimpey supports a flexible, evidence-based approach to housing mix which takes the specific circumstances of individual sites into consideration rather than a rigid requirement that may become out-dated during the plan period. This approach would recognise that the appropriate mix may differ between strategic greenfield allocations, brownfield regeneration sites and windfall developments.

Q3.23 What flexibility exists within the policy framework to respond to changing market conditions, viability circumstances, government policy and local housing needs over the Plan period, and how will decisions be made where viability pressures arise?

21. Taylor Wimpey supports the principle of flexibility within the policy framework, particularly to address viability. The plan should provide a clear and effective mechanism for responding to viability pressures where the cumulative cost of infrastructure and other policy requirements affects the ability of development to deliver affordable housing.
22. This is particularly important in Medway given the scale of infrastructure requirements associated with the proposed growth strategy, particularly on the Hoo Peninsula. Taylor Wimpey supports the principle that development should contribute appropriately towards the infrastructure necessary to support growth. However, the cumulative burden of these requirements needs to be considered alongside the Plan's affordable housing objectives.
23. Flexibility in dwelling mix and tenure can assist in responding to viability pressures but will not necessarily be sufficient where infrastructure costs are substantial. There is a limit to the extent to which changes to the housing mix or tenure can compensate for significant infrastructure costs while maintaining an appropriate level of affordable housing. This issue is particularly relevant to Hoo given the scale of infrastructure investment required to support the proposed transformational growth.
24. This scenario was played out through the appeal on the West of Hoo site (ref: 6004418) where it was agreed between the Council and appellant through the appeal that the scheme would provide a minimum of 10% affordable housing and any further affordable housing requirement would be unviable given the level of Section 106 Agreement obligations requested through the IDP. This demonstrates that flexibility should be applied for strategic sites when determining the appropriate level of affordable housing provision.

25. Taylor Wimpey considers that this should not mean that affordable housing is automatically reduced when viability pressures arise. Rather, the plan should recognise that infrastructure and affordable housing are both important objectives and that, where the cumulative requirements exceed what a development can support, a proportionate balancing exercise will be necessary.