

Medway Local Plan Examination

Matter 3: Meeting Housing Needs

On behalf of Rosconn Group and St John's College
(Ref E.82)

Introduction

- 1.1. This Pre-Hearing Statement has been prepared by Savills (UK) Limited on behalf of Rosconn Group (the promoter) and St John's College (the landowner). Rosconn are promoting Site SR4 (North Little Church Road, west of Town Road, Cliffe Woods) which is identified for up to 130 dwellings in Policy SA11 (Rural Settlements). Rosconn and St John's College are broadly supportive of the Plan and its spatial strategy, however, we have concerns that a number of the development management policies are not sound.
- 1.2. This Statement specifically addresses our concerns with Policy T9 (Self-build and Custom Housebuilding) which forms part of Matter 3.

Question 3.51: 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?

- 1.3. The Council's evidence base suggests there is a need for around 430 self-build and custom build plots over the plan period. In allocating just the one site, the Council is heavily reliant on sites of over 100 dwellings to meet this need.
- 1.4. In taking such an approach, Policy T9 needs to be flexible and provide a positive framework for self and custom build homes to come forward. The onerous affordable housing and marketing requirements set out within the policy could act as a deterrent to the delivery of self and custom-build plots resulting in the Council not being able to meet its need.
- 1.5. Our Regulation 19 response sets out our concerns with the draft policy. These concerns have not been addressed in the submitted plan or in the Topic Paper (B22.6) which provides justification for the policy. A summary of our concerns along with commentary on the Topic Paper is provided below:

1. *The inclusion of self and custom build plots in the calculation of affordable housing across the site. The Council's Local Plan Viability Assessment Update – June 2025 does not provide any explanation, analysis or justification of why the self-build and custom housing units have been excluded from the overall affordable housing provision on the larger sites.*
2. *The requirement for any unsold plots to be offered to the Council for affordable housing before they can revert to the landowner to be sold without restriction. This is on top of the requirements set out at Policy T3 (Affordable Housing) and it introduces a level of uncertainty surrounding viability and also deliverability.*

No justification has been provided in the topic paper (or elsewhere in the Council's evidence base) on these matters. The Topic Paper provides evidence on the demand for self-build and custom housebuilding plots but does not explain or justify the interaction between Policy T9 and Policy T3, nor does it provide evidence supporting the exclusion of self-build plots from affordable housing calculations or the requirement for unsold plots to be transferred for affordable housing purposes. On this basis, the policy cannot be found sound.

3. *The requirement to market plots for a minimum of 12 months, followed by a further three-month period for the Council to determine whether it wishes to acquire the plots, creates a potentially lengthy and onerous process which adds uncertainty to development delivery.*

Paragraph 6.1.6 notes that a 12-month marketing period is considered an acceptable length of time and this is not disputed. However, the addition of a further period of at least three months to allow the Council to determine whether it wishes to acquire the plots is considered excessive and unjustified. This additional stage prolongs the disposal process, delays the delivery of housing and introduces unnecessary uncertainty for landowners, developers and purchasers. Notwithstanding our position that this policy requirement should not be retained, if it is to remain, the policy should be amended to require discussions with the Council to commence and conclude during the 12-month marketing period, thereby avoiding unnecessary delay and ensuring that the policy is effective and deliverable.

4. *The viability evidence appears to assume that self-build and custom-build development will come forward at densities comparable to conventional residential development, whereas in practice such development is often delivered at lower densities, which may have implications for both capacity and viability.*

Paragraph 6.1.3 of the Topic Paper indicates that the self-build and custom-build element is expected to come forward as a separate component of larger developments. In practice, self-build and custom-build schemes are typically developed at materially lower densities than conventional housing developments. No evidence has been provided to demonstrate that the density assumptions applied within the viability assessment appropriately reflect the likely form and delivery of self-build and custom-build development.

The Topic Paper identifies that approximately 392 self-build and custom-build plots are expected to be delivered on allocated sites of 100 dwellings or more. If these plots are delivered at lower densities, as is often the case, the number of homes which could be delivered on each site could be significantly reduced. This has the potential to reduce the overall capacity of site allocations, diminish flexibility within the housing land supply and impact upon the delivery of affordable housing and other policy requirements. No assessment within the Topic Paper or elsewhere has been provided to demonstrate that these implications have been fully considered.

Conclusions

- 1.6. Given that the Council is relying principally on larger residential developments to meet the identified need for approximately 430 self-build and custom-build plots, it is essential that Policy T9 provides a flexible, deliverable and commercially realistic framework for implementation. As currently drafted, the policy introduces a number of onerous and unjustified requirements which risk acting as a disincentive to the provision of self-build and custom-build plots and may therefore undermine the Council's ability to meet its identified need over the Plan period.
- 1.7. The policy has not been demonstrated to be effective or justified by the evidence base and should therefore be amended to remove unnecessary burdens, provide greater flexibility, and ensure that self-build and custom-build plots can be delivered in a manner that supports, rather than constrains, housing delivery.