

Hearing Statement

Matter 3 – Meeting Housing Needs

Issues

- Whether the policies and designations relating to meeting housing needs in the Plan are clear, positively prepared, justified, effective and consistent with national policy. Whether the housing growth identified in the Plan is justified and deliverable.
- Whether the Plan and its relevant policies provide an ongoing five-year supply of deliverable housing sites.
- Whether the Plan and its policies provide for an adequate and appropriate mix of housing and sites.
- Whether delivery mechanisms to meet housing needs are clear, justified and effective.

Questions

Housing Requirement

- 3.1 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?
- 3.1.1 The housing requirement for the MLP (ref: A1) has been assessed in line with the National Planning Policy Framework (NPPF) (2024) and the relevant National Planning Practice Guidance (NPPG).
- 3.1.2 The set-by-step calculation is set out in Chapter 4 of the Local Housing Needs Assessment (LHNA) (ref: B10). In line with paragraph 62 of the NPPF (2024), the LHNA (ref: B10) identified a local housing need of 1,594 per annum; as per the Standard Method based on the relevant NPPG at the time of reporting.
- 3.1.3 Once local housing need had been assessed, in line with the relevant NPPG, the Council assessed the number of new homes that could be provided in Medway. This was based on land availability, constraints on development and any other relevant matters.

Evidence on land availability and constraints on development

- 3.1.4 The Land Availability Assessment (LAA) (ref: B1) identified a supply of sites in Medway which is suitable, available and achievable for housing up to 2041. Following an initial survey of sites identified, taking account of designations in footnote 7 of the NPPF (2024), planning officers estimated housing yields and delivery timescales, which involved engagement with planning agents, and a windfall allowance. The final LAA was published in June 2025.

- 3.1.5 Paragraph 77d of the NPPF (2024) states that local planning authorities should make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites. Following the Regulation 19 consultation, the Council prepared a Housing Delivery Topic Paper (ref: B22.5) in December 2025, including a stepped housing requirement to reflect updated lead-in times and build-out rates of future housing.
- 3.1.6 Section 5.2 of the Housing Delivery Topic Paper (ref: B22.5) sets out updates to the housing trajectory. The anticipated start of the build period for 38 site allocations has been extended; 36 site allocations would start after the first five years of the plan period. This is to allow for the timely delivery of infrastructure.

Other relevant matters

- 3.1.7 Paragraph 16b of the NPPF (2024) states that plans should be prepared positively, in a way that is aspirational but deliverable. Paragraph 4.23 of the LHNA (ref: B10) found that the local housing need figure is substantially more than both the 2018-based projections and a Census-based straight-line projection by 2041. The rate of household growth of the local housing need projection is also notably more than the rate of growth for Medway between 2024 and 2041 compared to the 2014-based projection.
- 3.1.8 Medway Council's housing requirement is a significant change compared to recent housing delivery. Table 1 of the Housing Delivery Topic Paper (ref: B22.5) shows the number of net additional homes completed during each of the previous five years compared to local housing need, derived from the Standard Method. Table 1 shows a deficit in net additional dwellings completed during each of the previous five years compared to local housing need, and a downturn in the last year which reflects the national trend.
- 3.1.9 The Council's position regarding unmet housing need is consistently set out in the section 2.1 of the Duty to Cooperate Statement (ref: A11), section 2.1 of the Statement of Common Ground with Prescribed Bodies (ref: A12.1) and section 2.3 of the Housing Delivery Topic Paper (ref: B22.5).
- 3.1.10 Gravesham Borough Council previously maintained a longstanding request for the Council to accommodate an estimated unmet housing need of 2,000 homes. Prior to Gravesham Borough Council's 'Proposed Submission Draft (Regulation 19)' Consultation, which started in April 2026, the Council did not receive an assessment of land availability from Gravesham Borough Council, therefore reasonable alternative growth options in the SA (ref: A3.2) that included Gravesham's calculation of unmet housing need could not be justified. Furthermore, the Council's SA (ref: A3.2, paragraph 5.3.12) found that reasonable alternative growth options without Gravesham's calculation of unmet housing need performed better overall. This matter is agreed with Gravesham Borough Council in the Statement of Common Ground with Prescribed Bodies (ref: A12.1).
- 3.1.11 On 14 October 2025, Tonbridge and Malling Borough Council wrote to the Council and other neighbouring local planning authorities requesting assistance with unmet housing

need. Prior to this, Tonbridge and Malling Borough Council had not been able to confirm if it had any unmet housing need. The Council responded on 10 December and confirmed that it is unable to assist in meeting unmet housing need due to being at an advanced stage of plan preparation; Medway's high development needs, including 1,636 homes per annum; and constraints that would make accommodating further growth challenging. In the Statement of Common Ground with Prescribed Bodies (ref: A12.1), Tonbridge and Malling Borough Council recognised the difficulties in Medway meeting any unmet housing need, given the timing of the request and constraints identified.

Housing requirement

3.1.12 Whilst the paragraph 69 of the NPPF (2024) states that a housing requirement figure may be higher than the identified local housing need if, for example, it includes provision for neighbouring areas, the reasons set out above justify the Council's housing requirement, which reflects local housing need derived from the Standard Method, which is 1,636 per annum. This was based on the latest affordability ratios and dwelling stock estimates as of May 2025.

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

- 3.2.1 The stepped housing requirement, set out in section 3.2 (pages 6-7) of the Housing Delivery Topic Paper (ref: B22.5), is realistic and deliverable in light of the constraints identified in the evidence base. The stepped housing requirement reflects updated lead-in times and build-out rates of future housing.
- 3.2.2 The MLP's (ref: A1) site allocations are the product of the Land Availability Assessment (ref: B1), Sustainability Appraisal (refs: A3.1, A3.2 and A3.3), Habitats Regulations Assessment (refs: A4.1, A4.2 and A4.3), the wider evidence base and the site selection process (ref: B22.1). The LAA (ref: B1) identified a supply of sites in Medway which is suitable, available and achievable for housing up to 2041. This informed a judgement as to whether a site can be considered deliverable within the next five years, or developable over a longer period, based on indicative lead-in times and build-out rates for the development of different scales of sites.
- 3.2.3 Section 5.2 of the Housing Delivery Topic Paper (ref: B22.5) sets out updates to the housing trajectory. The anticipated lead-in times for 38 site allocations has been extended; 36 site allocations would start after the first five years of the plan period. This is to allow for the timely delivery of infrastructure. Paragraphs 5.2.5, 5.2.6 and Table 5 of the Housing Delivery Topic Paper (ref: B22.5) set out the updated approach to indicative build-out rates for eight sites, noting that the timely delivery of necessary infrastructure should stimulate the market to deliver at a higher build-out rate.
- 3.2.4 The site allocation policies set out criteria and subsequent design principles to be addressed in a planning application. For example, the text preceding Policy SA7

(Capstone Valley) notes landscape character and M2 Junction 4 which are development constraints that were considered in the evidence base. The site allocations are adjacent to Ancient Woodland, while the Habitats Regulations Assessment (refs: A4.1, A4.2 and A4.3) identified adverse air quality impacts from the MLP at the North Downs Woodlands SAC. Policy SA7 (Capstone Valley) requires the specification of buffer strips close to Ancient Woodland to be agreed with Natural England and Medway Council. Policy SA7 (Capstone Valley) also requires a landscape-led masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details. The masterplan will be informed by a green infrastructure strategy and an open space strategy. The Council's response to question 1.4 proposes additional wording as a main modification under 'Criteria' within Policy SA7 (Capstone Valley) to mitigate adverse air quality impacts from the MLP at the North Downs Woodlands SAC. In this way, the MLP (ref: A1) ensures that the housing requirement is realistic and deliverable in light of the constraints identified in the evidence base.

- 3.3 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.

Plan's minimum requirement

- 3.3.1 The MLP (ref: A1) states the correct annual housing requirement of 1,636 homes per annum, but the total housing requirement to 2041 (24,540) at paragraphs 1.3.5 and 6.1.2 is incorrect. As in the Housing Delivery Topic Paper (ref: B22.5), following the Regulation 19 consultation and an 'advisory visit' from the Planning Inspectorate, the plan period has been revised from 2026/27-2040/41 to 2025/26-2040/41. Therefore, the total housing requirement is 26,176, which is the minimum number of homes the MLP (ref: A1) seeks to provide during the plan period.

How has the housing requirement been set

- 3.3.2 The Council's response to question 3.1 explains how the housing requirement has been set.

Flexibility and contingency

- 3.3.3 The Council considers that there is flexibility and contingency in meeting the housing requirement because: a) four strategic site allocations and the Frindsbury Peninsula Opportunity Area may come forward sooner than anticipated; b) planning applications for non-allocated sites may be granted planning permission; and c) the Council is leading regeneration of urban centres.
- 3.3.4 Table 2 of the Housing Delivery Topic Paper (B22.5) shows a housing supply buffer/contingency of 150 homes. Note that four sites will continue to deliver homes beyond the plan period. The difference between the total number of homes anticipated by 2040/41 and the total number of homes once development is completed for site

allocations GN15, HHH22 & HHH31, LW8 and SMI6 is 2,450 homes. This would provide for a buffer/contingency should these sites deliver homes sooner than anticipated. The total number of homes that could be delivered on the Frindsbury Peninsula Opportunity Area will need to be determined by the Frindsbury Peninsula Planning Framework.

3.3.5 Paragraph 14.14.4 of the MLP (ref: A1) notes that Veetee, one of the largest businesses at MCE, occupies three sites at Medway City Estate (MCE), located at the Frindsbury Peninsula. Veetee is committed to Medway and has explored relocating to a modern, integrated facility at Kingsnorth. However, any relocation would need to be facilitated by value and revenue generated from the redevelopment of Veetee's three sites at MCE, which could be partially delivered during this plan period. Veetee promoted three sites at MCE during the local plan-making process, with delivery starting before 2030. However, Veetee's Regulation 19 representations stated that their three sites could comprise an initial phase of development at the Frindsbury Peninsula. However, the Council's housing trajectory, which is attached to the Housing Delivery Topic Paper (ref: B22.5), anticipates housing being delivered at the Frindsbury Peninsula from 2036/37, i.e. year 11 of the plan period. In response to the Council's Regulation 19 consultation, Veetee suggested changes to Policy SA13 (Frindsbury Peninsula Opportunity Area) to allow flexibility for homes to be delivered sooner than year 11, including an initial phase of up to 1,200 homes, i.e. a significant increase on 690 homes stated in Policy SA13.¹

3.3.6 Planning officers have been engaged in pre-application work and were aware of the potential additional scale of development that could provide for a buffer/contingency should planning permissions be granted in future, in addition to sites allocated in the MLP (ref: A1):

- In January 2026, Catesby Estates submitted a planning application for up to 350 homes off Stoke Road and Binney Road, Allhallows (MC/26/0001).
- In March 2026, Homes England submitted a planning application for up to 450 homes at Chattenden Barracks (MC/26/0436).
- A recently dismissed appeal (reference 6002071) relating to the planning application for Land off Lower Rochester Road, Wainscott sought outline planning permission for up to 800 homes.

3.3.7 As part of the ongoing regeneration of Chatham town centre, the Council has been awarded funding through the Government's Brownfield Land Release Fund for the demolition of The Brook multi-storey car park. The car park was part of site CCB13 in the Land Availability Assessment (ref: B1), but it was not selected for allocation in the MLP because it was deemed unavailable at the time. The Council has appointed Medway Development Company to deliver circa 100 new homes.² Site CCB13 is listed

¹ Medway Council (2025) Regulation 19 Representations. Available at (page 166 of the electronic file): <https://medway.oc2.uk/docfiles/35/File%20C.pdf> [Last accessed 26 August 2026]

² Medway Council (2026) Latest news: Brook car park to close ahead of new homes plan. Available at: https://www.medway.gov.uk/news/article/2118/brook_car_park_to_close_ahead_of_new_homes_plan [Last accessed 13 August 2026]

in Table 4 of the Housing Delivery Topic Paper (ref: B22.5), which relates to an ongoing review of the Brownfield Land Register. The Council considers that there is additional potential for urban regeneration to contribute to housing supply over the plan period. The Council is leading regeneration of urban centres and set up Medway Development Company for direct delivery. Projects have included the conversion of the vacant offices at Mountbatten House that dominate Chatham's centre into new homes which are due for completion next year. Schemes such as these are catalysts for regeneration and boost confidence in the wider market. The Council is also delivering investment and improvements in Strood and Gillingham. Medway is well positioned to respond to the national policy position supporting development in accessible locations that benefit from train stations, such as the main centres in Medway.

- 3.3.8 Although Table 2 of the Housing Delivery Topic Paper (B22.5) shows a buffer/contingency of 150 homes, which includes the windfall allowance of 1,703 homes (i.e. 131 homes per annum from Year 3 of the plan period), there is a significantly higher potential windfall allowance. Therefore, the Council considers that there is flexibility and contingency in meeting the housing requirement.
- 3.4 Please could the Council clarify and confirm the Plan's housing requirement figure for adoption of the Plan, provide an explanation of how this is identified and the buffer applied to manage non-delivery risk.
- 3.4.1 The MLP's (ref: A1) annual housing requirement is 1,636 homes per annum, or 26,176 in total by 2041. The MLP's total housing requirement by 2041 (24,540) at paragraphs 1.3.5 and 6.1.2 is incorrect. As in section 1.2 of the Housing Delivery Topic Paper (ref: B22.5), following the Regulation 19 consultation and an 'advisory visit' from the Planning Inspectorate, the plan period has been revised from 2026/27-2040/41 to 2025/26-2040/41. Therefore, the total housing requirement is 26,176.
- 3.4.2 An explanation of how this is identified is set out in the Council's response to question 3.1.
- 3.4.3 The buffer applied to manage non-delivery risk is set out in the Council's response to question 3.3.
- 3.5 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.
- 3.5.1 The Council acknowledges that the MLP should contain a policy which sets out the housing requirement figure and identifies how the need would be met and distributed.
- 3.5.2 The Council is proposing the following new 'Medway Spatial Strategy 2025-41' policy within Chapter 3 of the MLP (ref: A1) as a main modification, which is based on the existing 'Spatial Development Strategy' panel on pages 25, 26 and 27 of the MLP (ref: A1):

“1. Housing Requirement

Between 2025 and 2041, provision will be made for a minimum of 26,176 dwellings through the allocation of land and the granting of planning permissions in accordance with the spatial strategy set out in this Plan.

2. Regeneration-Led Growth

The primary focus for growth will be the regeneration and intensification of Medway's urban area through the effective use of previously developed land, town centres, waterfront locations and sustainable transport corridors.

Major regeneration and mixed-use development will be concentrated within: Chatham town centre, Chatham Waterfront, Chatham Intra and the Station Gateway; Strood town centre and riverside areas; and Gillingham Waterfront and the wider northern Gillingham regeneration area. These locations will deliver homes, employment, services, public realm improvements, sustainable transport infrastructure and enhanced connections between communities.

3. Strategic Urban Transformation

The Frindsbury Peninsula is identified as a strategic long-term regeneration opportunity extending beyond the Plan period. Development will be comprehensively planned to deliver mixed-use neighbourhoods, employment space, green infrastructure and nature-based solutions that respond to climate change, improve environmental quality and contribute to the creation of a revitalised river-based urban quarter.

4. Sustainable Expansion of Settlements

Outside the urban regeneration area, development will be directed to sustainable urban extensions and village growth locations where: a) development is supported by the timely provision of infrastructure; b) access to services, employment and sustainable transport can be achieved; c) impacts on landscape, biodiversity, heritage assets, agricultural land and the wider environment are avoided, minimised or mitigated; and d) development contributes positively to the creation of healthy, resilient and inclusive communities. Strategic growth locations include Hoo St Werburgh and Chattenden, Capstone Valley, West of Strood and Lower Rainham.

5. Strategic Masterplanning

Development within strategic growth locations will be brought forward in accordance with comprehensive masterplans that coordinate the delivery of housing, employment land, transport networks, utilities, social infrastructure, green infrastructure and environmental enhancement measures.

6. Hoo Peninsula

Hoo St Werburgh will be the principal focus for growth on the Hoo Peninsula. Development will support the long-term evolution of Hoo St Werburgh as a sustainable settlement providing a broad range of homes, employment opportunities, retail, education, healthcare, leisure and community facilities. Growth will be planned and phased to ensure that infrastructure is delivered

alongside development, respects the distinctive landscape, coastal and heritage setting of the Hoo Peninsula, supports environmental recovery and strengthens local identity and sense of place.”

- 3.5.3 The content within the proposed new ‘Medway Spatial Strategy 2025-41’ policy set out above is expressed in the MLP (ref: A1), but not in this form.
- 3.5.4 The Council notes paragraphs 1.1, 1.3 and 1.4 of the Planning Inspectorate’s ‘Procedure Guide for Local Plan Examinations’ (10th Edition). However, a consultation on an addendum would have delayed submission, Examination in Public and adoption.

Housing Supply

- 3.6 Does the Plan clearly set out the expected, ‘planned-for’ sources of housing supply to meet the identified housing requirement?
- 3.6.1 The site allocation policies within Chapter 14 of the MLP (ref: A1) set out the number of new homes and the anticipated delivery across years 1-5, 6-10 and 11-15 and 15+ of the plan period. However, the Council acknowledges that the MLP (ref: A1) does not set out the expected, ‘planned-for’ sources of housing supply to meet the identified housing requirement. The expected, ‘planned-for’ sources of housing supply to meet the identified housing requirement is clearly set out in section 4.1 (pages 8-10) and in the Appendix (housing trajectory) of the Housing Delivery Topic Paper (ref: B22.5).
- 3.6.2 The Council is proposing that the expected, ‘planned-for’ sources of housing supply to meet the identified housing requirement is clearly set out within Chapter 3 of the MLP (ref: A1) as a main modification, which reflects section 4.1 and the Appendix (housing trajectory) of the Housing Delivery Topic Paper (ref: B22.5) as follows:

“The following sources of housing supply will meet the identified housing requirement:

Source of Housing Supply	Homes
Windfall	1,703
Large sites under construction as of March 2025 to be delivered during plan period	2,489
Large sites permitted, but not allocated	238
Small sites permitted (229 less 17% lapse rate)	190
Allocated sites to be delivered during plan period	21,706

- 3.7 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?
- 3.7.1 The Council acknowledges that the MLP (ref: A1) should contain the housing trajectory, rather than the Housing Delivery Topic Paper (ref: B22.5). To address this, the Council has proposed a main modification in its response to question 3.6.
- 3.7.2 The Council notes paragraphs 1.1, 1.3 and 1.4 of the Planning Inspectorate’s ‘Procedure Guide for Local Plan Examinations’ (10th Edition). However, a consultation on an addendum would have delayed submission, Examination in Public and adoption.

3.8 How does the Plan demonstrate that the housing trajectory is deliverable across the Plan period, including on strategic sites?

- 3.8.1 The housing trajectory is based on a comprehensive site-by-site assessment of deliverability, informed by engagement with site promoters, infrastructure providers and statutory consultees. The strategic allocations have been subject to detailed technical assessment, such as the Strategic Transport Assessment (refs: B18.1 to B18.12). For example, Table 3.1 of the Strategic Transport Assessment – Proportionality Assessment (ref: B18.6) indicates when highway mitigation schemes will be required, and this informed the updated housing trajectory attached to the Housing Delivery Topic Paper (B22.5). The Infrastructure Delivery Plan (ref: B2), which will be subject to ongoing review, demonstrates that the infrastructure required to support growth can be provided in step with development. Taken together, the evidence has informed the criteria and subsequent design principles for each site allocation policy and demonstrates a realistic prospect that housing will be delivered at the rates anticipated in the trajectory across the plan period.
- 3.8.2 In the Council's response to the Inspectors' initial query No. 18, Appendix F of MLP/ED6 provided site-specific information regarding strategic site delivery. This should be considered with paragraphs 12.71, 12.72 and Table 12.7c of the Viability Assessment (ref: B5). The Viability Assessment (ref: B5) supports the Council's consideration of strategic sites being achievable for development over the plan period.
- 3.8.3 The Council intends to produce five initial statements of common ground with planning agents promoting strategic sites by 14 September 2026.

3.9 How does the Plan demonstrate the role of small sites / SMEs in housing supply and the robustness of any windfall assumptions?

- 3.9.1 Paragraph 73 of the NPPF (2024) expects land to accommodate at least 10% of the housing requirement on sites no larger than one hectare. Section 4.3 of the Housing Delivery Topic Paper (B22.5) sets out the contribution of small and medium-sized sites to the housing supply. Of all components of housing supply, 2,708 homes on 318 sites of less than one hectare are to be delivered, i.e. 10.3% of the housing requirement.
- 3.9.2 The MLP (ref: A1) includes a specific policy, Policy T11 (Small Sites and SME Housebuilders) for sites of five to 60 homes. Paragraphs 6.11.1 and 6.11.2 of the MLP (ref: A1) recognises the role of small sites and SME housebuilders in housing delivery and diversifying the local market.
- 3.9.3 Chapter 3 of the Land Availability Assessment (ref: B1) sets out the approach to determining a robust windfall allowance. The windfall allowance and timing were updated in Table 2, paragraph 4.1.2 and Table 3 of the Housing Delivery Topic Paper (B22.5). Note that the total windfall allowance is based on the latest:
- 10-year average of small site completions (minus any permitted on appeal);
 - 10-year average of large site completions from conversions; and
 - 10-year average of large site completions from prior notifications.

3.9.4 The total windfall allowance is 131 dwellings per annum from Year 3, i.e. 2028/29, of which approximately 47% would be from small site completions.

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

3.10.1 The Land Availability Assessment (LAA) (ref: B1) identified a supply of sites in Medway which is suitable, available and achievable for housing up to 2041. Following an initial survey of sites identified in an interim LAA (October 2023)³, taking account of designations in footnote 7 of the NPPF (2024), planning officers estimated housing yields and delivery timescales, which involved engagement with planning agents, and a windfall allowance. The final LAA was published in June 2025.

3.10.2 Paragraph 77d of the NPPF (2024) states that local planning authorities should make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites. Following the Regulation 19 consultation, the Council submitted a Housing Delivery Topic Paper (ref: B22.5) in December 2025, including a stepped housing requirement to reflect updated lead-in times and build-out rates of future housing.

3.10.3 Section 5.2 of the Housing Delivery Topic Paper (ref: B22.5) sets out updates to the housing trajectory. The anticipated start of the build period for 38 site allocations has been extended; 36 site allocations would start after the first five years of the plan period. This is to allow for the timely delivery of infrastructure.

3.11 What mechanisms does the Plan identify to assess its performance and how it will respond to delivery underperformance (e.g. contingency, review triggers)?

3.11.1 The Council submitted a Monitoring Framework (ref: A14) to enable accurate reporting on the performance of the MLP (ref: A1), including housing policies.

3.11.2 The monitoring and implementation of the MLP (ref: A1) will be an active and ongoing process, embedded in the Council's wider corporate functions and supported by a comprehensive monitoring framework, the annual Authority Monitoring Report, infrastructure funding reporting and a range of related strategies covering climate change, transport, health, economic development and environmental management. The Council has submitted a Monitoring Framework (ref: A14) comprising a suite of indicators across housing, employment, transport, infrastructure, health, climate change, biodiversity, heritage, minerals and waste, enabling it to assess the effectiveness of policies, measure development outcomes and identify emerging issues at an early stage. The Monitoring Framework (ref: A14) is expressly designed to evolve over time, allowing the Council to incorporate new data sources, refine indicators and support continuous improvement throughout the Plan period.

³ Medway Council (2023) Land Availability Assessment: Interim Report. Available at: https://www.medway.gov.uk/downloads/file/8413/medway_land_availability_assessment_september_2023 [Last accessed 26 August 2026]

- 3.11.3 Delivery of the MLP (ref: A1) will continue to rely upon close collaboration across Council departments, public sector partners, infrastructure providers, businesses, developers, registered providers, environmental organisations and local communities. The Council has a strong track record of partnership working and intervention where necessary to unlock development and secure positive outcomes. This includes supporting the delivery of affordable housing, coordinating infrastructure investment, securing developer contributions, advancing regeneration initiatives and working proactively with delivery partners to overcome barriers to implementation. The annual publication of an Authority Monitoring Report demonstrates that Medway already undertakes extensive monitoring of housing delivery, employment growth, infrastructure provision, environmental performance and regeneration activity, providing a robust basis for responsive plan implementation and review.
- 3.11.4 Importantly, the MLP (ref: A1) should not be viewed as a static document. The Council will continue to apply its policies with appropriate professional judgement, recognising that changing economic circumstances, technological innovation, market conditions, funding opportunities and wider public policy objectives may give rise to development proposals that differ from those envisaged when the MLP (ref: A1) was prepared. Where proposals demonstrably deliver sustainable development, support the strategic objectives of the MLP (ref: A1) and secure positive outcomes for communities and the environment, the Council has the ability to exercise flexibility in decision-making. Monitoring will identify where policy refinements, supplementary guidance or partial or full plan reviews may be required. Such review mechanisms are a normal and expected part of plan-making and development management and should be regarded as business as usual over the coming three to five years rather than evidence of any deficiency in the MLP (ref: A1) itself.
- 3.11.5 The Council also recognises that the governance context in which the MLP (ref: A1) will be delivered is changing. Local government reorganisation will result in the replacement of the existing structures across Kent and Medway from April 2028, with new unitary authorities assuming responsibilities currently exercised by existing councils. Despite these institutional changes, the strategic ambitions that underpin the MLP (ref: A1) remain closely aligned with wider objectives across Kent for economic prosperity, housing delivery, infrastructure investment, environmental enhancement, climate resilience and improved quality of life. The proposed new governance arrangements are intended to strengthen strategic decision-making and create opportunities for greater collaboration across administrative boundaries.
- 3.11.6 Therefore, the Council is confident that the vision, objectives and development strategy established through the MLP (ref: A1) will continue to provide a strong foundation for future planning across the area. Local government reorganisation, any future devolution arrangements and the preparation of new strategic and local development plan documents, including any future Spatial Development Strategy and successor local plans, will build upon rather than replace the evidence, spatial strategy and long-term

ambitions established through the MLP (ref: A1). Through proactive monitoring, collaborative delivery, targeted intervention and proportionate policy review, the Council will ensure that the MLP (ref: A1) remains effective, relevant and responsive to changing circumstances whilst continuing to support the delivery of new homes, economic growth, social wellbeing, infrastructure improvements and the conservation and enhancement of Medway's natural and historic environment.

- 3.11.7 The Council will continue to adhere to the requirements of the Housing Delivery Test results. In the previous Housing Delivery Test (HDT) results, published in December 2024, Medway scored 72% of delivery compared to the total number of homes required. The latest Housing Delivery Test results were published in August 2026. The Council's Housing Delivery Test Action Plan was approved by Cabinet on 3 June 2025.
- 3.11.8 In the latest HDT results, published in August 2026, Medway scored 60% of delivery compared to the total number of homes required. Therefore, all three planning policy consequences are triggered under the NPPF and the HDT Measurement Rulebook (paragraph 4).⁴
- 3.11.9 Paragraph 4.1.5 of the Housing Delivery Topic Paper (ref: B22.5) acknowledges that a 20% buffer would ordinarily be applied to the first five years post-adoption due to the last published HDT result; however, this has been applied to the middle part of the plan period and subtracted from the late part of the plan period in the stepped housing requirement.

Policy T2: Housing Mix

- 3.12 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?
- 3.12.1 The Local Housing Needs Assessment (ref: B10) was prepared meeting the requirements of Framework and Planning Policy Guidance. The methodology employed in identifying the housing mix required over the plan period is set out in Chapter 5 of the Assessment (ref: B10).
- 3.12.2 This included analysis of demographic information. In essence, the consultants (HDH Planning) used a Long Term Balancing Housing Markets Model. This disaggregates the Standard Method, having regard to changes in factors, such as births, deaths, the ageing of the population, and migrations patterns over the Plan period. It is assumed that the occupancy patterns of housing continues as now (e.g. older person households will continue to under occupy housing), however unsatisfactory occupancy patterns (such as over crowding) are modelled out.

⁴ Ministry of Housing, Communities & Local Government (2026) Housing Delivery Test measurement rule book. Available at: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book> [Last accessed 22 August 2026]

3.12.3 Through this process, the mix of housing is required to house the whole of the Medway population is modelled. The planned housing mix will, over time, provide a mix to better house the future population. Initially the mix is provided by tenure (Table 5.4), and then is disaggregated, within each tenure, by size (Tables 5.5 to 5.9).

3.12.4 The housing mix requirement outlined in the Assessment (ref: B10) is central to the focus of Policy T2 (Housing Mix) as well as to the supporting housing policies for specific accommodation types.

3.13 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?

3.13.1 As in the response at 3.12 above, the housing mix set out in Chapter 5 of the LHNA (ref: B10) is to balance the housing market over the whole plan period.

3.13.2 Policy T2 (Housing Mix), in the second paragraph, provides for reference to updated evidence that emerges over plan period, in guiding development. However, the Council considers the evidence is currently appropriate. The approach uses the national household projections and the indications of change in household formation rates, for example, to account for demographic changes and subsequent changes in housing need over the Local Plan period. The Sub National Population Projections are based on levels of births, deaths and migration observed over a five-year reference period, leading up to the base year. However, projections are not forecasts and, because of the natural uncertainty of demographic behaviour, any set of projections will inevitably differ from actual future outcomes to some degree. Therefore, regular updates will be made to the evidence base as well as review of the Local Plan.

3.13.3 As part of the Local Plan annual monitoring, demographic trends are assessed with use of the latest biennial ONS projections which can be used to assess when up-dated evidence is required between Local Plan reviews and to gauge if subsequent updates to the projections suggest a change in the level of housing need.

3.13.4 The LHNA, at paragraph. 5.7, highlights that residents aged over 75 years will represent a greater proportion of the population over the Local Plan period, which has been a consistent feature over the previous national calculated projections for Medway. Requirements for additional specialist accommodation for older person households are detailed in LHNA table 7.2.

3.14 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?

3.14.1 The Housing Mix policy requirements were tested in the Local Plan Viability Assessment (ref: B5) in Chapter 8 (paragraphs 8.36 to 8.39) and findings and recommendations set

out in Chapter 12. Information on developer consultation and engagement in the preparation of the Viability Assessment (ref: B5) is set out in Appendix 1. A stakeholder workshop was held on 6 November 2024. All businesses associated with the local housing market were invited to observe the preliminary outputs of the study and to discuss the methodological assumptions used to derive the estimates. A range of different organisations were invited including developers, agents, Registered Providers and planning professionals. In total, there were 23 different stakeholder organisations at the event. A copy of the slides used in the workshop and a copy of the draft consultation report was sent to all the attendees subsequently, as well as those originally invited that were unable to attend the workshop. All recipients were encouraged to feedback their views. Table A1.2 sets out how feedback was considered and the actions taken.

- 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?
- 3.15.1 The Council is preparing Statements of Common Ground with lead developers on large strategic sites and the strategic allocation policies require a housing mix reflecting the needs in the LHNA (Ref B10), or updated information. Further details will be agreed at outline and detailed planning application stages. Where updated evidence supports changes in housing needs and market conditions, the Council will consider the updated evidence in the determination of planning applications or review of conditions.
- 3.15.2 Policy T2 (Housing Mix) states that “the latest Local Housing Need Assessment will be used to help inform which house sizes and mix should be delivered in key locations in urban and rural areas to meet the objectively assessed needs of Medway as detailed in the latest evidence.” This should be caveated, in that the mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.
- 3.15.3 The Council will need to commission updates to the LHNA to inform subsequent reviews of the MLP. Therefore, Policy T2 is not relying on the current LHNA (ref: B10) and it is only used to help inform housing mix requirements on strategic sites.
- 3.15.4 Policy HO8 in the new NPPF (August 2026) recognises that there will need to be flexibility in the market sector. The preferred mix needs to be shown in policy, although may not be applied for market housing.
- 3.16 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?
- 3.16.1 The Housing Mix policy requirements were tested in the Local Plan Viability Assessment (Ref: B5) in Chapter 8 (paragraphs 8.76 to 8.88) and findings and recommendations set

out in Chapter 12. The Viability Assessment (Ref: B5) paragraph 2.25 (p.13) confirms that policies were tested cumulatively.

3.16.2 The Council recognises that viability is challenging in some parts of Medway, specifically brownfield regeneration sites. The Council's policy approach to Affordable Housing (Policy T3) reflects the need to balance considerations. The development management process provides for a further detailed review of the balance of policy requirements where viability pressures arise.

3.17 How will the Council monitor the implementation of Policy T2, the delivery of the intended housing mix and what indicators and review mechanisms will be used to assess policy effectiveness? How will identified needs for specialist housing be translated into deliverable development proposals and completed units during the Plan period?

3.17.1 The Council will use the Monitoring Framework for the Plan to assess the implementation of Policies in reviewing the housing mix on approved and completed developments. This information will be reported in the annual Authority Monitoring Report and will be used to assess the effectiveness of the Policy and identify if a review is required. The needs for specialist housing will be discussed in ongoing engagement with developers of proposed strategic site allocations in the Plan and through the Development Management process, including pre-application engagement.

Policy T3: Affordable Housing

3.18 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?

3.18.1 The Local Housing Needs Assessment (Ref: B10) was prepared to meet the requirements of the Framework and Planning Policy Guidance in identifying the need for affordable housing. The PPG sets out the method to be used to calculate the need for affordable housing (2a-018-20190220 to 2a-024-20190220). This has been followed and is set out in Chapter 6 (and Appendix 2) of the Assessment (Ref: B10). The calculation is summarised in Table 6.1. The need for affordable housing, calculated as per the PPG is 436 per year.

3.18.2 This evidence was used, in combination with the findings of the Viability Assessment (Ref: B5), to inform the content of Policy T3.

3.19 How has the evidence on housing need, affordability, demographic change and local housing market conditions informed the affordable housing policy, and why is the proposed approach considered the most appropriate when assessed against reasonable alternatives?

3.19.1 The affordable need, as calculated in line with the PPG, does not provide a target. As confirmed through case law (Jelson) the purpose of the affordable need figure, is as set out in paragraph 2a-024-20190220 of the PPG. This says:

The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.

- 3.19.2 The affordable need, as calculated in line with the PPG is a flow, not an absolute need. Whilst it can provide a useful indicator of mix, it should not be considered as a requirement.
- 3.19.3 As set out in the response to 3.13 above, the mix is based on the total Standard Method based housing need, disaggregated by tenure and size.
- 3.19.4 The Council considered the evidence in the Local Housing Needs Assessment (ref: B10) and Viability Assessment (Ref: B5) in preparing this Policy. The Council had the option of applying a district wide standard policy requirement, or setting different thresholds, such as in urban or rural areas for the application of the Policy. Policy T3 reflects the updated evidence, specific stakeholder engagement organised at Regulation 18 consultation stages, experience through development management and engagement with the Council's Housing Service, developers and Registered Providers. This provides an appropriate informed approach, which varies from the comparable current Development Plan policy H3, [Medway Local Plan, 2003](#).
- 3.20 [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?](#)
- 3.20.1 The Affordable Housing policy requirements were tested in the Local Plan Viability Assessment (Ref: B5) in Chapter 8, and findings and recommendations were set out in Chapter 12. The Viability Assessment (Ref: B5) included assessment of different development typologies, including the strategic allocations and regeneration sites. The findings informed the content of Policy T3, which requires higher levels of affordable housing in the higher value development areas, and accepts lower levels of affordable housing in the lower value areas, reflecting the evidence on brownfield regeneration sites.
- 3.21 [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?](#)
- 3.21.1 The Affordable Housing policy requirements were tested in the Local Plan Viability Assessment (Ref: B5) in Chapter 8, and findings and recommendations were set out in Chapter 12. The Viability Assessment (Ref: B5) included assessment of different

development typologies, including the strategic allocations and regeneration sites. The findings informed the content of Policy T3, which requires higher levels of affordable housing in the higher value development areas, and accepts lower levels of affordable housing in the lower value areas, reflecting the evidence on brownfield regeneration sites. The Viability Assessment (Ref: B5) paragraph 2.25 (p.13) confirms that policies were tested cumulatively.

3.22 Please provide a schedule setting out the anticipated affordable housing delivery by site and phase across the strategic allocations and explain any instances where delivery is expected to differ from policy requirements. How will affordable housing be secured on large, phased developments?

3.22.1 The Council has provided a schedule setting out the anticipated affordable housing delivery by site and phase across the strategic allocations at in the Appendix to this Hearing Statement. The Appendix to this Hearing Statement sets out the theoretical maximum delivery figure based on the application of Policy T3 (Affordable Housing) and the housing trajectory attached to the Housing Delivery Topic Paper (ref: B22.5). However, actual delivery may differ due to site-specific development viability, occupation triggers and phase sequencing. Strategic site allocations for North Gillingham and Land West of Strood have been omitted from this answer because further discussion is required with planning agents through the drafting of statements of common ground. Affordable housing on strategic allocations will be secured through planning obligations associated with planning permissions. Section 106 agreements will specify the quantity, tenure mix and phasing of affordable housing, ensuring delivery alongside market housing. The Council will provide an update on anticipated affordable housing delivery on strategic sites with planning permission at the hearing session.

3.23 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?

3.23.1 The Policy provides sufficient flexibility to respond to changing conditions over the plan period and for a viability assessment to be submitted with a planning application if the affordable housing contribution does not meet the Policy requirements. The Council has provided further guidance to support the implementation of this Policy in Chapter 5 of the Developer Contributions and Obligations Guide (ref: B4). The level of developer contributions per dwelling was subject to public consultation in Spring 2026. The Developer Contributions and Obligations Guide (June 2026) has been adopted by the Council following a Cabinet meeting.⁵

⁵ Medway Council (2026) Developer Contributions and Obligations Guide. Available at: https://www.medway.gov.uk/downloads/file/2746/medway_guide_to_developer_contributions_and_obligations_2018 [Last accessed 26 August 2026]

3.24 How will affordable housing delivery and tenure provision be monitored throughout the Plan period, what intervention mechanisms are proposed if delivery falls below expectations, and how will the evidence base be reviewed to ensure the policy remains effective and justified?

3.24.1 The Council will use the Monitoring Framework for the Plan to assess the implementation of Policies in reviewing the quantum and mix of affordable housing on approved and completed developments. This information will be reported in the annual Authority Monitoring Report and will be used to assess the effectiveness of the Policy, and identify if a review is required, including an update to the evidence base. The needs for affordable housing will be discussed in ongoing engagement with developers of proposed strategic site allocations in the Plan, and through the Development Management process, including pre-application engagement.

3.25 What evidence is there that registered providers can absorb and manage the level of affordable housing anticipated by the Plan?

3.25.1 As part of the Council's Enabling function, by the Housing Services team, regular engagement takes place with registered provider partners in Medway. This includes discussions on local housing need, progress of sites they are delivering/reviewing, any barriers to delivery, sector challenges, and providing updates on progress of the Local Plan and the relevant affordable housing policies, surveys etc. This ensures good communication and relationships with our registered provider partners and supports early conversations about the level and type of affordable housing required in Medway.

3.25.2 The Council has a very healthy list of registered providers in Medway and has seen many new providers coming into Medway and delivering affordable homes over the last few years, with a good number of providers focusing on Medway as one of their key priority areas for new homes. This provides assurance for the longer-term provision of affordable homes and is a positive indicator that registered providers can absorb and manage the level of affordable housing anticipated by the Local Plan.

3.25.3 The Local Planning Authority also continues to engage with registered providers, and to work directly with developers and providers to identify solutions that deliver affordable housing. The 'cascade' aspect of the Policy facilitates the absorption and management of affordable housing in consultation with registered providers.

3.26 Why is the chosen affordable housing strategy the most appropriate when considered against reasonable alternatives and the available evidence base?

3.26.1 See our response to Question 3.19 above. The strategy recognises the level of needs for affordable housing, and the different market characteristics of development sites in the spatial strategy. Urban regeneration is a critical component of the Plan's spatial strategy, but some viability challenges are acknowledged. The Policy responds to the findings in the Local Plan Viability Assessment (Ref: B5) in applying a variable requirement reflecting viability. The Plan's strategy in bringing forward development on

both brownfield and greenfield sites at scale in Medway also facilitates the delivery of a range of types and tenures of homes, including affordable housing.

Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation

- 3.27 What evidence supports the identified need for supported housing, older persons' accommodation, nursing homes and residential care provision across the Plan period, and how have changing demographic trends, care models and patterns of need informed the policy approach?
- 3.27.1 The Local Housing Needs Assessment (Ref B10) considered the needs of specific groups, including older persons, looked after children and people with disabilities. This is set out in Chapter 7 of the Assessment. The [Medway Joint Strategic Needs Assessment Adult care and support chapter](#) provides evidence on demographics of an ageing population in Medway, care needs, and an overview of services and trends reflecting care models. The evidence indicates trends in demands and sets out recommendations for commissioning, which include Planning and Housing.
- 3.27.2 The [Council's Market Position Statement for Adult Social Care](#) provides data on new requests for Adult Social Care, and details of residential and nursing care with reference to the Care Quality Commission data for April 2026. [The current residential care position](#) notes that Medway has a robust provision for residential care, although there are deficiencies in certain areas, such as a shortage of residential and nursing beds for dementia patients.
- 3.27.3 The Council has also considered information from development management case work and trends in the types of planning applications being submitted, such as the change of use of family houses to small homes for looked after children. The Council collates development data on C2 use classes (residential institutions) and reports in the annual Authority Monitoring Report. The report for 2024/25 showed:
- A gain of 145 bedrooms in elderly person care homes in 2024/25
 - A gain of 78 children's home bedrooms over the last 5 years
 - A gain of 15 supported living bedrooms over the last 5 years for adults with mental health concerns or learning difficulties.
- 3.27.4 The Council has also had reference to its Housing Strategy, One Medway Council Plan, Adult Social Care Strategy which reference aims to support people living in their own homes. The level of this support can influence the needs for supported and other forms of specialist housing. This is recognised in the LHNA at paragraph 7.22, where it reports that '*the majority of older person households in Medway are likely to remain in general housing*'. The assessment then considers the role of adaptations.
- 3.27.5 This evidence has informed the Policy content for the range of types of accommodation to be considered, and criteria to meet different needs and provide for sustainable development. The final paragraph of the Policy supports the adaptation of homes to meet changing needs and aspirations from householders to remain in their own homes where and when possible.

- 3.28 How has the Council assessed the need for different forms of specialist accommodation, including extra-care housing, supported housing, residential care and nursing care, and what evidence demonstrates that the proposed approach is the most appropriate when assessed against reasonable alternatives?
- 3.28.1 The Local Housing Needs Assessment (Ref B10) considered the needs of specific groups, including older persons, people with disabilities and looked after children. This is set out in Chapter 7 of the Assessment. The assessment was prepared meeting the requirements of the Framework (paragraphs 71 and 73) and supporting Guidance.
- 3.28.2 The Assessment used current and projected demographic information, and industry recognised modelling tools, such as the Housing Learning and Improvement Network's (Housing LIN) Strategic Housing for Older People (SHOP) tool, which is the model recommended within Paragraph 004 of the PPG. The LHNA considered the current supply of specialist housing against the projected need over the plan period and identified the quantum and types of need.
- 3.28.3 The Policy provides criteria to guide the location and design of specialist accommodation, and recognises different needs, such as those for children's home and incorporation of dementia friendly standards where appropriate.
- 3.28.4 The Policy is to be read in conjunction with Policy T2 to seek the delivery of an appropriate housing mix to meet the community needs over the plan period. In the absence of specific sites being promoted for specialist accommodation in the preparation of the Plan and therefore failing to demonstrate availability requirements in the Land Availability Assessment, the Council considers that the Policy provides an appropriate approach.
- 3.29 What evidence demonstrates that the identified need for specialist accommodation will translate into deliverable development proposals and completed units during the Plan period, and can the Council identify the sites, locations, unit numbers and/or bedspaces expected to contribute towards meeting those needs?
- 3.29.1 With reference to monitoring data in the AMR given in our response to Question 3.27, the Council anticipates a proportion of supply to continue to be provided through windfalls, responding to demands and the development of specialist facilities, including commissioning through the Council. The Council's Care for Medway strategy seeks to increase care provision in the area. The Council is currently planning for a new 80-bed care home, providing for a specialist dementia care facility, and beds to assist with discharging residents from hospital. In addition, on the wider site, there are plans for 12 single-storey units for adults receiving adult social care support.
- 3.29.2 The Council will engage with developers to further assess the opportunities to bring forward specialist housing in strategic growth areas. Policy SA10: Lower Rainham specifically includes provision of a care home. This was promoted by the developer as part of the wider housing mix for the site. There are further specific references to the provision of specialist housing in Policies SA1, SA4 and SA8. The Council will expect

Policy T4 to be read in conjunction with Policy T2, and this to inform discussions with developers, particularly at pre-application stage on large major sites. The Council intends to produce five initial statements of common ground with planning agents promoting strategic sites by 14 September 2026.

- 3.30 How does the distribution of specialist accommodation align with the Plan's spatial strategy, and what evidence demonstrates that proposed locations provide appropriate access to healthcare, public transport, local services and community infrastructure?
- 3.30.1 As outlined in our response to Question 3.29, part of the supply of specialist accommodation is anticipated through windfalls, managed through the Policy in conjunction with the Framework and wider policies in the Plan. The Policy provides criteria to guide development to sustainable locations. Inclusion of specialist accommodation in strategic growth locations will benefit from the planned services and improved transport in these locations, and in regeneration of urban centres, ready access to a range of existing services.
- 3.31 To what extent has viability testing considered specialist accommodation products, including extra-care housing, supported housing and care homes, and what evidence demonstrates that policy requirements will not undermine delivery, particularly on strategic allocations and in conjunction with affordable housing and other policy obligations?
- 3.31.1 The Local Plan Viability Assessment (ref: B5) considered older people's housing, referencing the two main types of product defined in the PPG – retirement living or sheltered housing, and extra care housing or housing-with-care.⁶ These were tested separately in the Assessment (see Chapter 10, page 177, Chapter 12, page 203, and Appendix 17). The results showed challenged viability in delivering this form of specialist housing. This may point to the need for partnership working to deliver a range of housing products through different funding routes.
- 3.31.2 As referenced in our response to Question 3.29, the Council will engage with developers to further assess the opportunities to bring forward specialist housing in strategic growth areas. The proposed Rainham Parkside Village in Policy SA10: Lower Rainham provides evidence of developer interest in delivering specialist accommodation as part of wider development. With the ageing demographics of the population, it is anticipated that market opportunities will continue to emerge to meet growing demand.
- 3.32 How will the Council monitor delivery of specialist accommodation throughout the Plan period, what intervention mechanisms are proposed if delivery falls below expectations, and what flexibility exists within the policy framework to respond to changing demographic trends, care models and market conditions?

⁶ Ministry of Housing, Communities and Local Government (2019). Planning Practice Guidance: Housing for older and disabled people (paragraph 63-010-20190626). Available at: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people> [Last accessed 26 August 2026]

3.32.1 The Council will use the Monitoring Framework for the Plan to assess the implementation of Policies in reviewing the delivery of specialist housing on approved and completed developments. This information will be reported in the annual Authority Monitoring Report and will be used to assess the effectiveness of the Policy, and identify if a review is required, including an update to the evidence base. The needs for specialist housing will be discussed in ongoing engagement with developers of proposed strategic site allocations in the Plan, and through the Development Management process, including pre-application engagement. The Council also has a key role in its commissioning of services for adults and children. The commissioning process will respond to changing demographic trends, care models and market conditions, and Care Quality Commission inspections.

Policy T5: Student Accommodation

3.33 What evidence supports the identified need for student accommodation over the Plan period, how has the Council engaged with higher education institutions and accommodation providers in assessing future requirements, and why is the proposed approach the most appropriate when assessed against reasonable alternatives?

3.33.1 The Local Housing Needs Assessment (ref: B10) considered the needs for student accommodation at paragraph 7.88. Although the higher education institutions did not respond to this consultation, the Council has used wider evidence in assessing the needs for student accommodation. It is understood that many students continue to live in their family home during their studies, or commute from outside the area.

3.33.2 There is a cluster of higher education institutions in the Chatham Maritime/North Gillingham area, and this has significantly developed over the last 25 years. Most recently with the [merger of the University of Greenwich and University of Kent](#), to be known as the London and South East University Group. Council Tax records can be used to identify student households through Class M and Class N categories. Class M is linked to or affiliated with an education establishment. Class N is not linked to education establishments, but residents are eligible for Council Tax exemption if the whole property is occupied by full-time students.

3.33.3 As of August 2026, Council Tax records show there are currently 275 Class M student accommodation addresses registered and 346 Class N addresses. Many of these are in the proximity of the higher education institutions.

3.33.4 The Council consulted with universities in the preparation of the Plan, including the participation of representatives from Mid Kent College, University of Kent, University of Greenwich in focused stakeholder workshops and events at Regulation 18 stages in 2023 and 2024. ([see Regulation 18 Consultation Summary Report](#)). The University of Kent made representations at Regulation 18 consultations in 2024 and 2024.

3.33.5 A report from the University of Greenwich, '[Why not live in Medway](#)', April 2024 noted that a high proportion of students (65% of the survey group of 268 students) lived in

London and commuted to Medway for their studies. The report included information on accommodation and reasons for the students' choice of residential location.

- 3.33.6 The Council also monitors planning applications and gathers information on student accommodation. Issues that have been found with properties previously listed as Class M student accommodation are that as the spaces are tied to students affiliated with an educational institution, there is not enough demand and some spaces are left empty.
- 3.33.7 This is evidenced in an example at 85 Jeffery Court Gillingham previously given permission to be built as a 63-bed student accommodation block, but could only be half filled by the university, so was converted to large HMO use instead to allow other individuals to reside there. This is clearly referenced in the Case Officer's report on planning application [MC/26/0409](#). A letter from the University of Kent in Appendix 1 of the Planning Statement shows that the demand for spaces has dropped over the past 5 years and more students choosing to commute rather than require residential accommodation. The submitted Planning Statement explains that since Covid-19 there has been a significant drop in the use of student rooms which has resulted in the applicant being unable to occupy the purpose-built block. The statement continues to state that existing University of Kent accommodation within Medway (namely Piers Quay) has experienced an ongoing decline since 2019, with 217no. empty rooms in 2019 which has now increased to 400no. empty rooms, resulting in more than 50% of the rooms left as vacant. The application is accompanied by a statement from the University of Kent (Appendix 1 of the [Planning Statement](#)) which verifies this claim and evidence further decline in student accommodation take up. The Planning Statement at paragraph 5.10 reports:

Our Client's experience is reflective of other Universities. The University of Kent, Greenwich University and Christchurch University have been unable to let their own accommodation. It is understood that Christchurch and the University of Kent now only have 40% students who do not commute to university from their parental or their own homes.

- 3.33.8 The Council monitors planning for student accommodation and reports annually in the Authority Monitoring Report. There were no new student rooms completed in 2024/25.
- 3.33.9 Cumulatively this information is evidence of limited needs for purpose-built student accommodation, and the Policy approach is appropriate in providing criteria to guide development management, and supports opportunities for town centre development, rather than taking an approach in allocating specific sites for purpose-built student accommodation. Policy T5 is therefore considered the most appropriate approach because it positively supports delivery where need is demonstrated, focuses development in sustainable locations close to educational institutions and town centres and provides flexibility to respond to changing circumstances over the Plan period.

3.34 How does Policy T5 contribute to the overall housing strategy of the Plan, including the delivery of mixed and balanced communities, and what relationship exists between student accommodation provision, HMOs and the wider housing market? In particular, to what extent would additional purpose-built student accommodation reduce pressure on conventional housing stock?

3.34.1 Policy T5 supports the Plan's wider housing strategy by ensuring that the accommodation needs of students, identified in paragraph 63 of the Framework as a group with specific housing requirements, are appropriately planned for. The Policy contributes to mixed and balanced communities by directing purpose-built student accommodation towards sustainable locations whilst avoiding the over-concentration of student households within established residential neighbourhoods. It supports the regeneration of urban centres.

3.34.2 Evidence as outlined in 3.33 above shows there is some relationship between student housing and wider HMOs, as in the example given of the development in Jeffery Street. There is a concentration of student households in the north Gillingham area and surrounds. Gillingham North is one of the wards where the Council has introduced an Article 4 Direction to manage wider HMOs (see Question 3.47).

3.34.3 Evidence as outlined in 3.33 above shows limited demand for purpose-built student accommodation. Should needs and market conditions change over the Plan period, the Policy provides guidance for planning applications.

3.34.4 The policy therefore seeks to secure appropriate provision for students whilst protecting the supply of permanent self-contained housing needed by the wider population.

3.35 What evidence demonstrates that the identified need for student accommodation will translate into deliverable development proposals, and can the Council quantify the amount of accommodation expected to be delivered, identify where it will be accommodated, and provide an indicative delivery trajectory?

3.35.1 Policy T5 is intentionally framed as a criteria-based policy to guide development management as the evidence does not support establishing a fixed quantum requirement for student accommodation across the Plan period.

3.35.2 The Council considers that deliverable development may emerge over the Plan period, through factors such as:

- the continued presence and anticipated growth of the higher and further education sector;
- interest from education institutions in expanding the student offer within Medway; and
- regeneration opportunities within Chatham and Gillingham town centres and the attractiveness of these locations due to their proximity to campuses, services and public transport.

- 3.35.3 The Council expects the majority of future provision to come forward through windfall opportunities, particularly in Chatham and Gillingham town centres, Chatham Maritime, and other accessible locations close to education facilities.
- 3.36 How does the policy ensure that student accommodation is directed to sustainable locations with appropriate access to higher education facilities, public transport, town centres, employment opportunities and community services, whilst avoiding unacceptable impacts on residential amenity and local communities?
- 3.36.1 Policy T5 requires student accommodation to be located in accessible and sustainable locations, and provides direction for the determination of planning applications, such as well served by walking, cycling and public transport networks. The Policy is favourable to the development of student accommodation in town centres, which would positively contribute to the objectives of Policy S15: Town Centres Strategy.
- 3.37 What evidence demonstrates that educational institutions, developers and accommodation providers support the forecasts and delivery assumptions underpinning the policy, and how would the identified needs be met if anticipated schemes fail to come forward?
- 3.37.1 Please see information above in relation to questions 3.33 and 3.34. Educational institutions, developers and accommodation providers were invited to comment on the methodology and findings of the Local Housing Needs Assessment (ref: B10). The Council did not receive any comments from educational institutions. Wider evidence set out in our response to Questions 3.33 and 3.34 demonstrate that it is not appropriate for the Plan to establish a specific requirement for student housing. The Policy provides direction for planning applications, and flexibility to respond to needs and market opportunities over the Plan period.
- 3.37.2 If any future anticipated schemes did not come forward, student accommodation needs would continue to be met through a combination of students living at their family home, existing purpose-built accommodation, private rented accommodation and HMOs, and future opportunities brought forward under Policy T5.
- 3.38 How will the delivery of student accommodation throughout the Plan period be monitored? What flexibility exists to respond to changing patterns of higher education demand and student numbers, and what intervention mechanisms are proposed if delivery falls below anticipated levels?
- 3.38.1 Delivery of student accommodation will be monitored through the Monitoring Framework (ref: A14) and reported in the Council's annual Authority Monitoring Report. The measures will record student accommodation floorspace granted permission and student accommodation floorspace completions.
- 3.38.2 Monitoring and ongoing engagement with education institutions and developers will be used to assess the effectiveness of the Policy and identify if a review is required. Monitoring will assess trend-based data to review needs and market conditions. As no

quantitative level has been set for student accommodation needs in the Plan, it is not appropriate to identify a specific threshold that may trigger a review of the Policy.

Policy T6: Mobile Home Parks

- 3.39 What evidence demonstrates a need for mobile home park provision within Medway during the Plan period, what contribution is it expected to make towards meeting housing needs (including the needs of older persons), and why is the proposed policy approach in Policy T6 the most appropriate when assessed against reasonable alternatives?
- 3.39.1 The Local Housing Needs Assessment (Ref B10) at paragraph 3.11 considers park homes. These homes make up a small proportion of the housing stock (under 2%), albeit that this is a higher percentage than the national average. The LHNA did not find a specific need for this form of accommodation. There has been limited developer interest evidenced through planning applications. The last planning application for park homes was made in 2018.
- 3.39.2 Policy T6 seeks to protect existing sites for residents and secure amenity standards. It maintains housing choice and contributes to the diversity of the housing stock.
- 3.39.3 The evidence did not support identifying an allocation for a new or extended site for park homes. Similarly, the occupancy rates on the established parks and the coastal locations, where there are environmental constraints, did not support the allocation of the sites for wider housing types. The policy therefore adopts a balanced approach by safeguarding existing provision whilst allowing appropriate improvements where environmental, design and amenity considerations can be satisfactorily addressed.
- 3.40 How does Policy T6 ensure that mobile home park development is directed to sustainable locations, and how have environmental constraints, flood risk, landscape considerations, accessibility to services and the wider spatial strategy informed the policy approach?
- 3.40.1 The Policy does not seek to specify detailed criteria for locations new mobile home park development. The Council will consider planning applications against the criteria in the Framework and wider policies in the Plan, including DM1 Flood and Water Management, to secure sustainable development.
- 3.40.2 The Policy includes restrictions on the expansion of existing sites due to their location in proximity to sensitive rural and marine areas, and relative remoteness from services.
- 3.41 What evidence demonstrates that additional mobile home park provision is deliverable during the Plan period, including evidence of operator or landowner interest? How will identified needs be met if anticipated provision does not come forward?
- 3.41.1 The evidence base for the Plan has not identified specific need for this form of accommodation. Policy T6 does not require new mobile home park provision to contribute to achieving the Plan's housing strategy or establish a specific quantitative requirement for additional homes. The main purpose of the policy is to protect and

manage existing provision at Hoo Marina Park and Allhallows Park and to support appropriate enhancement and improvement where acceptable.

3.42 Does Policy T6 provide an effective framework for securing appropriate living conditions and site standards, and how will the Council monitor delivery and effectiveness of the policy, review evidence of need, and respond if provision significantly exceeds or falls below expectations?

3.42.1 The Council considers that Policy T6 provides an effective framework for securing appropriate living conditions and maintaining quality within mobile home parks. The Policy protects existing sites from loss, requires compliance with the latest Model Standards for Caravans in England, and sets out amenity and design matters to be considered in planning applications.

3.42.2 The Council will monitor the effectiveness of Policy T6 through its annual Authority Monitoring Report, recording losses and gains and any development proposals in mobile home parks. If provision significantly exceeds or falls below expectations, the Council would anticipate such change would be associated with a planning application, which would then be determined on the latest evidence, compliance with the Framework, and the wider policies in the Plan.

Policy T7: Houseboats

3.43 In terms of robust and up to date evidence, what need is there over the Plan period for houseboats as a specialist type of accommodation?

3.43.1 The Council notes that the Framework does not specify the planning for the needs of houseboats as a specialist type of accommodation. Further there is no reference to houseboats in Planning Practice Guidance for [Housing Needs of Different Groups](#). However, as Medway includes river and estuary locations, there are a number of residential houseboats at sites across the borough.

3.43.2 The Council records gains and losses of houseboats annually in the Authority Monitoring Report (AMR). Council held data in Council Tax records, and the Land and Property Gazetteer shows limited change. Reported data in the AMR shows:

	2015/16*	2016/17	2017/18	2018/19*	2019/20*	2020/21*	*2021-22	2022/23*	2023/24*	2024/25
Houseboats moved into Medway	25	22	11	15	9	9	9	10	9	14
Houseboats moved out of Medway	10	2	6	13	5	9	8	4	9	13
Net gain	15	20	5	2	4	0	1	6	0	1

* These numbers have changed from previously reported due to backdated notifications received from Council Tax

3.43.3 As of August 2026, the Council records show 409 houseboats in Medway. The limited change recorded over the past ten years and lack of planning applications for new moorings indicates that houseboats remain a niche form of specialist housing in Medway.

3.44 How would the policy seek to ensure that the need is met over the Plan period?

3.44.1 As the monitoring information set out in our response to Question 3.43 indicates that there is a not a significant need for this specialist type of accommodation, the Policy provides criteria to be applied in determining planning applications.

3.45 Is seeking to remove and dispose of vessels justified and effective (second bullet point of the policy)?

3.45.1 This aspect of the Policy reflects comments received in earlier consultation and concerns raised by stakeholders in achieving better amenity conditions in the river and estuaries in Medway.

Policy T8: Houses of Multiple Occupation

3.46 Should the title of this policy be Houses In Multiple Occupation (HMOs)?

3.46.1 Yes, the Council would support this as a modification to the Policy.

3.47 What is meant by an overconcentration of HMOs under Policy T8 (second bullet point) and how is this term defined?

3.47.1 The Council has researched practice in other local planning authorities to support guidance in the interpretation of Policy T8. It is currently preparing guidance that considers the preparation of a spatial data layer and records that can be used when determining planning applications to advise on current levels of HMOs. The guidance would use a cluster or percentage concentration threshold to define an overconcentration. The Council takes a similar approach in assessing the impact of Hot Food Takeaways. The determination of planning applications for HMOs also refer to the existing concentration. The proposed guidance would provide greater consistency and

clarity in the interpretation of Policy T8. The guidance is currently in development and will be considered by Members in coming months.

3.47.2 The Council's development management decisions and wider work on HMOs give consideration to overconcentration of HMOs. The Council has brought in an Article 4 Direction on Houses of Multiple Occupation. This was approved by [Cabinet](#) on 5 May 2026. It applies in seven wards, which account for 65% of the HMO provision in Medway. Evidence provided for the [Cabinet Report in December 2025](#), on Article 4 Directions for HMOs provided maps showing the location on HMOs in certain wards in Medway. This showed particular concentrations, which were assessed in preparing the Article 4 Direction.

3.47.3 The Council intends to propose a modification to the MLP at the hearing session to reference the guidance in Policy T8 wording.

3.48 Does Policy T8 seek to prevent the loss of any units suitable for family accommodation and, if so, how is this justified?

3.48.1 Yes. The Local Housing Need Assessment (Ref: B10) identified a significant need for larger residential units across all tenure types as detailed in the table below:

3/4/5 bed accommodation required in Medway to 2041 as proportion of all units needed	
Owner-occupied	48.2%
Private rented	52.9%
Shared Ownership	55.7%
Social rent/affordable rent	58.3%

3.48.2 Larger residential units tend to be those suitable as family accommodation.

3.48.3 The 2021 Census showed that 41.1% of households in Medway were family households which was above the level seen regionally (+4.3%) and nationally (+4.8%). The LHNA (Ref B10) at paragraph 7.53 assessed accommodation size by household type concluding that '*family households with children are more likely to be overcrowded and less likely to be under-occupied in Medway*'.

3.48.4 This evidence highlights a specific need for family sized housing in Medway.

3.48.5 This matter has also been identified in the made [Arches Chatham Neighbourhood Plan](#), 2024 where Policy HO3 seeks to secure against the loss of family housing.

3.49 What is meant by excessive parking demands or traffic (fourth bullet point) and how is this term defined?

3.49.1 Evidence provided for the Cabinet Report in December 2025, on Article 4 Directions for HMOs, noted issues of pressures of on-street parking, such as paragraph 5.3.5 in Appendix 4: *The proliferation of HMOs in these areas further increases this pressure*,

leading to neighbour disputes, and for residents to then park in an unsafe manner, or in a way that prohibits the safe passage of emergency vehicles.

3.49.2 The majority of the Article 4 areas are also Controlled Parking Zones, indicating areas of parking pressure. Under the parking permit application rules residents can apply for a parking permit for all vehicles that are registered to their address. So, an HMO with 6 adults has a higher likelihood of additional parking pressure than a 3-bedroom family house (which are typically the properties converted). For example, MC/26/0769 at 32 Salisbury Road in Chatham.

3.49.3 The Council will provide further clarification on the interpretation of this aspect of the Policy in the HMO Policy Guidance. Reference should also be given to Policy DM19. The Council intends to propose a modification to the MLP at the hearing session to reference the guidance in Policy T8 wording.

3.50 What level of family accommodation has been lost to HMOs (paragraph 6.8.3), in justifying this aspect of the policy?

3.50.1 Information provided at the table at paragraph 3.3.2 in Appendix 4 to the Cabinet report on 16 December 2025 on the Article 4 Direction on Houses of Multiple Occupation sets out the number of HMOs known or predicted across Medway. There were over 1000 HMOs reported.

Policy T9: Self-build and Custom Housebuilding

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?

3.51.1 The Self-build and Custom Housebuilding Topic Paper submitted with the Local Plan in paper B22.6 shows in table 4 (page 17) how these 430 plots are expected to come forward over the plan period. How this has been calculated has been explained in paragraphs 5.1.4 onwards (page 16). Analysis of previous self-build plot delivery since April 2016 shows that windfalls on small sites are expected to provide around 36 plots over the plan period, the policy 4% requirement on sites over 100 dwellings (not including predominantly flatted developments) are expected to provide just under 400 plots and the allocated site at Fenn Farm, Hoo to provide 4 plots. This demonstrates how the proposed policy approach should deliver sufficient numbers of serviced plots in order to meet the need over the plan period.

3.51.2 There were other sites that were promoted for self/custom build development as part of the call for sites, Land Availability Assessment (LAA) and during Reg 18, however, site AS2 was the only one deemed as suitable, available and achievable and taken forward for allocation in the Local Plan. This is explained in the supporting text for Policy T9 in the submitted Local Plan in paragraph 6.9.18.

3.51.3 There was one other site promoted for (part) self-build, which was found to be suitable, available and achievable in the LAA and allocated in the Local Plan (RN9); however, as

the number of dwellings on this site is over 100, then the Policy T9 requirement to provide 4% as self/custom build plots will automatically apply, which is why the site was not allocated directly.

3.51.4 Furthermore, although not explicitly self/custom build allocations, the promotion of self-build is also referenced in Policies SA7 and SA9.

3.52 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?

3.52.1 This was in response to concerns raised in earlier representations that self-build developments could be lengthy, drawn out and take longer to deliver than other types of housing resulting in noise, traffic generation and incomplete sites for a longer period of time. The inclusion of this option in the policy to be considered on a site-by-site basis allows the Development Management process the opportunity to include a condition to require a shorter timeframe for building the plots, if appropriate to that site. However, in a survey of applicants to the register (on page 26 of the topic paper), 60% of respondents said that they expected to be able to complete their build within a year (and 37% within 2 years), so the inclusion of a shorter time limit may not be necessary for many sites. The Planning case officer would at least have the opportunity from the policy wording to assess on a site-by-site basis to determine what is necessary.

3.53 Where Policy T9 refers to 'Expanding/intensifying existing residential permissions', does this mean solely permissions for self-build and custom housing? If not, how could this be retrospectively applied to another type of housing which already has planning permission, in terms of the effectiveness of the policy?

3.53.1 This refers to the position should a developer/land owner who already has already had planning permission granted for their site (for any residential use type) return to the authority with a new application to increase the number of dwellings permitted on site. In order to provide another way of delivering self/custom build plots (for which there is evidenced demand across the authority area), the Council through this Policy asks the developer to show how they have considered providing the additional units as self/custom build plots in order to help meet the demand.

3.54 Why does Policy T9 specifically refer to the role of 'Neighbourhood Plans', which does not seem to be a particular feature of Plan policies for other types of housing?

3.54.1 This reflects the areas of interest in Neighbourhood Plans in Medway, such as in Policy HOO4 (5) in the made [Hoo St Werburgh and Chattenden Neighbourhood Plan](#). This reference also follows wider guidance:

- Planning Practice guidance for self/custom building highlights the importance of supporting Neighbourhood Planning groups where they choose to include self-build and custom build housing policies in their plans (Paragraph: 025 Reference ID: 57-025-20210508) in order for the authority to be able to play a key role in brokering and

facilitating relationships to help bring suitable land forward. Inclusion of this feature within Policy T9 demonstrates Medway's commitment to this.

- The Right to Build Taskforce also includes a guidance note on Neighbourhood Plans and the process within the Plan Making and Policies section.

3.54.2 However, the Council acknowledges that there is a role for Neighbourhood Plans in providing for a wider range of housing types to meet local needs.

Policy T11: Small Sites and SME Housebuilders

3.55 How has the 60 dwellings (net) limit under Policy T11 been derived as regards maintaining the character and scale of the local area and the justification for the policy, and on the basis of what evidence?

3.55.1 The Council has developed Policy T11 through ongoing engagement with the Kent SME Developer Network and has benefited from a constructive and collaborative working relationship with SME housebuilders throughout the preparation of the Local Plan. The Council carefully considered the detailed representations submitted by the Network in September 2024 (E.153_Kent SME Developer Network A), which expressed strong support for the principle of a dedicated policy for small sites and SME delivery and provided detailed commentary on its operation and implementation. The resulting policy reflects this engagement and the shared objective of diversifying housing delivery, supporting SME builders, and bringing forward high-quality developments that respond positively to their local context.

3.55.2 The 60-dwelling threshold was promoted by the Kent SME Developer Network as a practical upper limit that distinguishes SME-led developments from the larger schemes typically delivered by volume housebuilders. The Network explained that larger SMEs begin to compete with national housebuilders at around this scale and that the threshold is intended to create opportunities for SME delivery whilst ensuring development remains proportionate to its surroundings. The SME Network itself acknowledged that developments substantially below 60 dwellings may be more appropriate in certain settlements and that the policy should operate flexibly in this regard.

3.55.3 The Council recognises that the success of Policy T11 will depend not only on the wording of the policy itself but also on its practical application. Therefore, the Council will continue to work proactively with the Kent SME Developer Network, as well as individual applicants and developers, to ensure the policy is implemented effectively. This includes applying appropriate professional judgement and flexibility on a case-by-case basis, recognising that the suitability of development will vary between locations. Whilst Policy T11 includes an upper threshold of 60 dwellings (net), this is a maximum rather than a target, and proposals will continue to be assessed against their ability to respect the character, scale, and circumstances of the particular location.

3.55.4 The Council also notes that the broad scale of development envisaged by Policy T11 is consistent with the Government's increasing recognition of medium-sized housing

schemes. In particular, the 2026 NPPF introduces a definition of "medium development" comprising schemes of between 10 and 49 homes on sites up to 2.5 hectares. Whilst not directly equivalent, the policy threshold sits within the same broad development typology, reinforcing the objective of supporting smaller and medium-scale developments that can diversify the housing market, increase delivery opportunities for SME builders and contribute positively to local communities. This provides further support for the principle underlying Policy T11 and its role within the overall housing strategy.

3.56 Why is the minimum 5 unit threshold (paragraph 6.11.1) not included in the policy itself, in terms of being effective?

- 3.56.1 The minimum threshold of five dwellings is referred to in the supporting text at paragraph 6.11.1 because it is intended as explanatory context rather than a separate policy requirement.
- 3.56.2 The key purpose of Policy T11 is to support SME-led development up to 60 dwellings, whilst ensuring proposals remain appropriate to their location and comply with the policy's qualitative criteria. The policy therefore focuses on the principal decision-making considerations, namely whether a proposal qualifies as a small or medium-sized development and whether it respects the character and scale of the local area. The supporting text provides additional guidance on the types of development the policy is intended to promote. The Council considers that this approach does not reduce the effectiveness of the policy, as the supporting text and policy are read together. Furthermore, the policy's implementation will continue to be informed by engagement with the Kent SME Developer Network and applicants, allowing an appropriate degree of flexibility and professional judgement in determining whether schemes fall within the intended scope of the policy.
- 3.56.3 The inclusion of a rigid minimum threshold within the policy itself could unnecessarily restrict otherwise suitable SME-led proposals that accord with the broader objectives of supporting housing delivery, diversification of the market and high-quality place-making.
- 3.56.4 Notwithstanding this, should the Inspectors consider that greater precision is necessary, the Council would be open to including reference to the five-dwelling threshold within the policy wording as a minor modification, as this would not alter the intended operation or direction of the policy.

3.57 Is Policy T11 seeking to direct such development to any particular locations in Medway?

- 3.57.1 No. Policy T11 is not intended to direct SME-led development towards particular settlements or locations within Medway. Instead, it provides a positive and supportive framework for the consideration of suitable small and medium-sized housing proposals, recognising the important contribution that SME housebuilders can make towards housing delivery, market diversification and design quality.

3.57.2 Proposals will continue to be assessed against the spatial strategy, settlement hierarchy and relevant development management policies of the Plan. The purpose of Policy T11 is therefore not to establish a separate locational strategy, but to provide an additional route through which appropriately scaled SME-led developments can be supported where they are otherwise acceptable in planning terms. This approach reflects the representations of the Kent SME Developer Network, which envisaged the policy operating flexibly across a range of locations and acknowledged that the appropriate scale of development would vary according to local context.

3.57.3 This approach is supported by the Kent SME network which explained through consultation responses that the policy would help bring forward development in a range of urban, suburban and rural fringe locations, rather than allocating or directing growth to any specific part of Medway.

3.58 How does Policy T11 accord with national policy in that at least 10% of the housing requirement is to be on sites that are no larger than one hectare?

3.58.1 Before turning specifically to Policy T11, it should be noted that the Council considers that the Plan as a whole accords with national policy requiring at least 10% of the housing requirement to be accommodated on sites of no more than one hectare. Paragraph 4.3.2 of the Housing Delivery Topic Paper (ref: B22.5) confirms that 2,708 dwellings are expected to be delivered on 318 sites of less than one hectare, equivalent to 10.3% of the Plan's housing requirement. The Council therefore considers that the Plan exceeds the minimum requirement set out in paragraph 73(a) of the Framework.

3.58.2 Policy T11 then, serves a complementary purpose. It provides a positive framework to support the delivery of small and medium-sized housing schemes by SME housebuilders, reflecting national policy recognition that such sites play an important role in housing delivery, support market diversification and are often built out relatively quickly. The policy is not intended to define "small sites" for the purposes of paragraph 73(a), nor is it the mechanism through which compliance with the 10% requirement is demonstrated. Instead, it supports a broader range of SME-led opportunities, including some medium-sized schemes, consistent with representations from the Kent SME Developer Network which advocated a policy supporting both small and medium-sized sites, including developments of up to 60 dwellings.

3.58.3 In this respect, Policy T11 complements the Council's wider housing supply strategy and accords with the Framework objective of supporting small and medium-sized sites through planning policies and decisions.

3.59 If a Small and Medium-sized Enterprises (SME) housebuilder proposed a site over 60 dwellings (net), how would this be considered under the Plan, if not Policy T11?

3.59.1 Policy T11 is intended to provide a positive and supportive framework for SME-led developments of up to 60 dwellings (net). Where an SME housebuilder promotes a scheme exceeding that threshold, the proposal would not automatically be precluded

from development, nor would it cease to be considered on its planning merits. Rather, it would be assessed against the wider provisions of the development plan, including the spatial strategy, site allocation policies (where relevant), housing policies, design policies and other applicable development management policies.

- 3.59.2 The purpose of the 60-dwelling threshold is to identify the scale of development that Policy T11 is specifically intended to support, reflecting representations from the Kent SME Developer Network regarding the scale at which SME housebuilders typically operate and where they begin to compete directly with volume housebuilders. The policy is therefore an enabling policy for a particular category of development rather than a cap on the size of development that may be delivered by an SME builder.
- 3.59.3 In practice, an SME developer may bring forward sites larger than 60 dwellings, including allocated sites or other strategic opportunities. Such proposals would simply be assessed against the relevant policies of the Plan rather than receiving the specific support offered through Policy T11. The Council therefore considers that the policy does not restrict SME participation in the housing market but instead provides an additional mechanism to encourage the delivery of small and medium-sized sites that make an important contribution to housing supply and market diversification.
- 3.59.4 Policy T11 should therefore be viewed as a policy that supports qualifying SME-led schemes up to 60 dwellings, rather than one that prevents SME housebuilders from promoting larger developments elsewhere within the Plan framework.
- 3.60 [In terms of Policy T11 being effective and justified, was consideration given to including small sites and SME housebuilders criteria in a broader housing policy?](#)
- 3.60.1 No. Through plan drafting and consultation the Council developed a standalone policy which it believes provides the most effective and transparent mechanism for recognising the distinct contribution that SME housebuilders can make to housing delivery, market diversification and placemaking. Policy T11 is intended to provide positive support for a specific category of development that is not solely concerned with the delivery of housing numbers, but also with broadening the range of housing providers operating within Medway and encouraging the delivery of smaller and medium-sized sites.
- 3.60.2 This approach reflects the close engagement undertaken with the Kent SME Developer Network throughout plan preparation. The Network actively advocated the inclusion of a dedicated SME policy and expressed strong support for the Council's decision to include Policy T11 within the Plan. The representations (E.153_Kent SME Developer Network A) advocate for a policy framework that would allow SME developers to operate successfully within the plan-led system and support both small and medium-sized sites.

3.60.3 Whilst it would have been possible to incorporate SME-related provisions within a broader housing policy, the Council considers that doing so would have reduced the visibility, certainty and weight afforded to this important aspect of housing delivery. A dedicated policy enables decision-makers, applicants and communities to clearly understand the circumstances in which additional support may be given to qualifying SME-led development proposals. It also aligns with national policy objectives which recognise the important contribution that small and medium-sized sites make to housing delivery and encourage local planning authorities to support them through policies and decisions.

3.60.4 The Council therefore considers that Policy T11 is both justified and effective as a standalone policy, providing a clear and proportionate framework that complements the wider housing policies of the Plan rather than duplicating them.

3.61 [Is there a typo under the second bullet point, second line of Policy T11?](#)

3.61.1 Yes, 'r' should be removed in a minor modification to the Plan.