



Planning for
A C Goatham & Son

REPORT ON HOUSING MEDWAY COUNCIL

May 2019

Our Ref: HJOA/18-01307



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This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2008.

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2 INTRODUCTION

2.1 This report considers housing delivery and supply, including affordable provision in Medway Council. Its structure is as follows:

Housing Delivery and Supply

- Adopted Plan;
- Emerging Plan;
- Authority Monitoring Report (December 2018);
- NPPF requirement for housing and assessment methods;
- Exceptionalities;
- Original Assessment;
- Updated Assessment; and
- Conclusions

Affordable Housing

- Need;
- Delivery;
- Shortfall; and
- Conclusion

2.2 Rapleys has considered the housing requirement in an original assessment in early 2018. This was updated to take account of the following:

- Revised NPPF 2018 (July 2018);
- Update to Revised NPPF (February 2019);
- Housing Delivery Test Rulebook (July 2018);
- Incorporation of Standard Methodology into Planning Practice Guidance (September 2018);
- Update to Monitoring Report (December 2018);
- Revised StaM to account for the new year (January 2019);
- Update to Standard Methodology, confirming application of 2014-based projections (February 2019); and
- Publication of the Housing Delivery Test results (February 2019).

2.3 This report makes the following conclusions with regard to the housing requirement and supply positions for Medway:

- The housing requirement is 1,659 dwellings per annum (dpa);
- The completion rate against the Housing Delivery Test is 47%;
- The housing land supply equates to 2.51 years against the LPA's best case scenario;
- The housing land supply equates to 1.78 years against the LPA's deliverable trajectory;
- The affordable housing requirement is (conservatively) 869 per annum; and
- The existing affordable housing shortfall is 5,029 over the period 2012-2017.

2.4 Medway themselves has not positively advocated a position on their current housing supply. However, the Council has acknowledged an inability to demonstrate five years' housing land, and accept the figures put forward in recent applications. As set out within **Section 7**, the appellant for the Cliffe Woods application stated that the Council had a supply of 2.75 years; the Council estimated their supply to be around three, and the Secretary of State found it to be approximately 3.6. The methodologies that have been used to calculate these figures vary inconsistently, but the one constant is the lack of a five year supply.

2.5 At present, the rate of supply within the district is modest, and there is little reason to expect that Medway's supply will exceed five years in the near to medium term.

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- 2.6 There is, in summary, an alarming shortfall in housing, as detailed within this report and its appendices. This document follows on from our earlier representations from June 2018 that mentioned, but did not dwell in detail upon, the housing supply situation within Medway.

3 ADOPTED PLAN

- 3.1 Medway adopted their Local Plan on 14 May 2003. Select policies were saved by the Secretary of State via a direction under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004. Following the publication of the NPPF in 2012 (and the Revised NPPF 2018), the Local Plan has not been reviewed. Nor have the policies contained therein been assessed against up-to-date national policy.
- 3.2 The Local Plan 2003 is guided by the Kent Structure Plan 1990 which was updated December 1996. It covers the period 1991-2011.
- 3.3 Government guidance at the time advised that a local plan should cover a period of ten years. It was the council's stated preference to extend the Local Plan to 2011 (tying it to the Kent Structure Plan Review). However, owing to lack of clarity about the future of the extensive Defence Estate at Chattenden, it was decided to maintain a ten-year Plan period of 1996-2006.
- 3.4 The Kent Structure Plan set the following housing requirement for Medway:

Kent Structure Plan - Medway housing requirement				
Dwellings	1991-2001	2001-2006	2006-2011	1991-2011
Total	9,000	4,000	3,000	16,000
Per annum (average)	900	800	600	800

Source: Medway Local Plan 2003

- 3.5 Over the Plan period of 1996-2006, this equated to a total of 8,500 dwellings. However, Figure 5g of the Local Plan 2003 sets out the housing supply over the period 1991-2006 (a total requirement of 13,000) as follows:

Figure 5g Housing Land Supply 1991-2006	
Kent Structure Plan requirement (1991-2006)	13,000
Dwelling completed (all sites, May 1991 to April 2000)	6,181
Large sites with planning permission (5+ units, as of April 2000)	2,585
Allowance for completion on small sites (<5 units, 2000-2006)	528
Windfall allowance (2000-2006)	513
Proposed allocations (1996-2006)	3,191
Total Supply (1991-2006)	12,923

Source: Medway Local Plan 2003

- 3.6 The following points emerge from a review of these figures:
- The total delivery 1991 to 2000 was 6,181. The requirement 1991 to 2001 was 9,000: an approximate shortfall of 2,819 (31% of the requirement);

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- The allowance for small sites and windfall development over the period 2000-2006 was 1,041. The approximate requirement over this period was 4,900.
 - In their division of 'small sites allowance' and 'windfall', the Council treat as separate two entities that are in reality the same. Taking them in combination, the allowance for unidentified sites is over 20%. This is unjustifiably high, especially considering the disappointing rate of delivery over the period 1991-2001. Even taking account of this allowance, the total anticipated supply is below the requirement provided for by the Kent Structure Plan.

- 3.7 Taking these considerations together, the rate of delivery since 1991 appears to have fallen below the requirement consistently. It has, in addition, been overly reliant on windfall allowance. Based on the presentation of the figures within the local authority's evidence, it appears that the small site allowance of 528 should be considered as part of the windfall supply.
- 3.8 There has been, as is clear from the above, a systemic failure in the ability of the Council's development strategy to deliver an adequate supply of housing land. This has been demonstrable and consistent across a period of almost three decades.
- 3.9 There is, as set out below, little reason to expect this shortcoming to change for the better within the foreseeable future: the speed with which emerging policy is coming forward remains slow, and it is clearly apparent that Medway will not be able to establish a satisfactory position on housing land supply within the next year, or even the next several years. There is no strategy in place (not even a draft has been published) to indicate how housing will be delivered across the next five years and beyond.

4 EMERGING PLAN

- 4.1 Medway has begun work on a new Local Plan. The anticipated plan period will be 2012 to 2035. Three rounds of consultation have been carried out, to date.
- Issues and Options (January - February 2016);
 - Development Options (January - May 2017); and
 - Development Strategy (March - June 2018).
- 4.2 The latest Local Development Scheme was approved at the Meeting of the Cabinet on 18 December 2018. Projected timescales are:
- Regulation 19 publication (Summer 2019);
 - Submission to Secretary of State (December 2019); and
 - Adoption (2020).
- 4.3 A SHMA (prepared by GVA Bilfinger; published November 2015) has been produced in support of the Plan. It is calculated using the 2012-based sub-national household projections, and sets an Objectively Assessed Need of 1,281 dwellings per annum over the period 2012-2037.

5 AUTHORITY MONITORING REPORT (DECEMBER 2018)

- 5.1 The latest Authority Monitoring Report (AMR) was published December 2018 and provides detailed information on the rate of delivery 2012/13 - 2017/18, as well as the projected build rate up to 2032/33. An extract of the document is included at **Appendix 01**.
- 5.2 The AMR provides two housing trajectories:
- An aspiration trajectory taking into consideration future sites (not yet identified); and
 - A deliverable trajectory taking into consideration sites that are either allocated or have permission.
- 5.3 In consideration of the local authority's housing position, a best-case scenario/aspiration trajectory has been adopted for the purposes of this report.
- 5.4 The AMR represents the most up-to-date source of Medway's housing completions, and may be used in seeking to assess the residential built rate against past and future requirements. These are assessed in greater detail in **Section 9**.
- 5.5 Of particular note is the comment on the housing requirement in Medway, which is included within **Appendix 1**, and summarised below:
- A Housing Position Statement (adopted June 2014) indicated that at least 1,000 dpa should be delivered over the emerging Plan period;
 - A SHMA (published November 2015) gave an OAN of 1,281 dpa over the emerging Plan period;
 - The Government 'will provide' a housing requirement figure for each authority. Medway's is expected to be higher than those calculated previously, and will be reported upon in future AMRs.
- 5.6 The Standard Methodology by which the housing need is to be assessed was published for consultation in November 2017, and incorporated unchanged into the Planning Practice Guidance 13 September 2018 (upon which time it became national planning policy). This is discussed in more detail in **Section 6**.
- 5.7 Using information that was adopted in September 2018 (and which had been published for almost a year prior to) it was possible to calculate the housing requirement in line with the Government's method.
- 5.8 It remains unexplained why the Standard Methodology requirement was not therefore included within the AMR of December 2018. In order for the Local Plan to be sound it will, as a point of principle established by the revised NPPF, have to demonstrate a deliverable trajectory that meets the minimum requirement set by the Standard Methodology. The decision not only to ignore this fact, but to persist in using the 1,000 dpa (a figure that was superseded by the SHMA in 2015) is an extraordinary one, and fails to recognise the reality of the current housing situation within Medway.

6 NPPF REQUIREMENT FOR HOUSING AND ASSESSMENT METHODS

- 6.1 The Revised NPPF was published in July 2018. It includes - with support from the Planning Practice Guidance (PPG) - the means by which local authorities should assess the housing requirement, delivery and supply. These are summarised below.

HOUSING REQUIREMENT (StaM)

- 6.2 *NPPF: Paragraph 60:* To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for.
- 6.3 *PPG: Housing and Economic Needs Assessment (paragraph 03):* The Standard Methodology (StaM) provides a *minimum* requirement housing figure, calculated as follows:
- Establish a baseline of household growth over a ten year period using the 2014-based household projections;
 - Adjust this figure as required with regard to the median workplace-based affordability ratio. For every 1% the local ratio exceeds the benchmark of 4, an increase of 0.25% is applied to the baseline need.
- 6.4 *PPG: Housing and Economic Needs Assessment (paragraph 05):* The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.
- 6.5 *PPG: Housing and Economic Needs Assessment (paragraph 15):* Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.

Any method reliant on 2016-based household projections will not be viewed as following the standard method provided for at paragraph 61 of the NPPF. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.

HOUSING DELIVERY (HDT)

- 6.6 *NPPF: Paragraph 75:* To maintain the supply of housing, local planning authorities should monitor progress in building out sites that have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.
- 6.7 The Government was expected to publish the results of the Housing Delivery Test (HDT) in November 2018, but did not meet this deadline. The *Housing Delivery Test Measurement Rule Book* was published in July 2018. It is possible to calculate results independently. The HDT is calculated as follows:
- Delivery: The sum of the following is used to assess the net increase in residential units:

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- Net increase in dwellings;
 - Net increase in Communal, Student bedspaces (divided by the average number of students per student-only households nationwide); and
 - Net increase in Communal, Other bedspaces (divided by the average number of adults per households nationwide).
- Need: The following figures are to be used:
 - 2015/16 - annual average of 2015-25 in the 2012 based household projections;
 - 2016/17 - annual average of 2016-26 in the 2012 based household projections;
 - 2017/18 - annual average of 2017-27 in the 2014 based household projections; and
 - 2018/19 onwards - StaM figure (or adopted housing target if less than five years' old).
- 6.8 Figures for the years 2015/16 to 2017/18 do not apply the affordability uplift to the requirement (which is currently 26.6% within Medway). This will only be applied to delivery years from 2018/19 onwards. For the HDT results in 2020, for example, the HDT will assess delivery for the years 2017/18 to 2019/20. This will still include one test year (2017/18) that sets a requirement without the affordability uplift.
- 6.9 It follows therefore that the full application of the StaM figures will not truly come into effect until 2021 (the point at which all three years in the HDT will take their cue from the StaM).
- Consequences of failure**
- 6.10 If delivery falls below the certain percentages, the NPPF advises that the following action is required:
- 95% - Councils are obliged to prepare an action plan to assess the causes of underdelivery and identify a strategy for increasing supply (NPPF, paragraph 75).
 - 85% - a 20% buffer should be applied to 5 year housing land supply statements (NPPF, paragraph 73). Such a shortfall is described as a 'significant underdelivery of housing'.
 - 75% - the policies which are the 'most important' for determining an application are out-of-date, and the presumption in favour of sustainable development should be applied (NPPF, paragraph 11, footnote 7). Such a shortfall is described as being 'substantially below the housing requirement'.
- 6.11 The 75% threshold is caveated in paragraph 215 of the NPPF:
- Results published November 2018 - delivery below 25% of housing required over the previous three years.
 - Results published November 2019 - delivery below 45% of housing required over the previous three years.
 - Results published November 2020 and beyond - delivery below 75% of housing required over the previous three years.
- 6.12 Owing to both the delayed application of the StaM to all three years of the HDT, and the delayed implementation of the 75% requirement, the full weight of the HDT will not become apparent until 2021. Results published in the intervening period should be viewed through the understanding that both the overall requirement and the presumption threshold will rise in subsequent years.

HOUSING SUPPLY (5YHLS)

- 6.13 *NPPF paragraph 73:* Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:
- (a) 5% to ensure choice and competition in the market for land; or
 - (b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan³⁸, to account for any fluctuations in the market during that year; or
 - (c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply (from November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement).
- 6.14 *NPPF paragraph 74:* A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:
- (a) has been produced through engagement with developers and others who have an impact on delivery, and has been considered by the Secretary of State; and
 - (b) incorporates the recommendation of the Secretary of State where the position on specific sites could not be agreed during the engagement process.

STRATEGIC PLANS AND TIME FRAMES

NPPF: Paragraph 22: Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

7 EXCEPTIONAL CIRCUMSTANCES, NPPF §60

- 7.1 NPPF paragraph 60 states that ‘strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - *unless exceptional circumstances justify an alternative approach*’.
- 7.2 Medway is not currently seeking to claim exceptionality. Any attempt to do so - as the below makes clear - would be without justified and defensible grounds.
- 7.3 The section details possible exceptional circumstances, in order to assess whether they should apply in this case. These provide an idea of whether there is any major development outside the Plan process (under construction, pending approval, part of wider regeneration, or subject to infrastructure improvements) that would increase rate of housing delivery without the Plan’s strategy, and so justify a reduction in the minimum adopted housing target:
- Regeneration schemes that are coming forwards outside of the Plan process;
 - Housing Infrastructure bid;
 - Current construction activity; and
 - Pipeline planning applications on major sites.

REGENERATION

- 7.4 Ten areas have been identified as ‘key regeneration sites’ (some of which, such as Chatham Maritime, Rochester Riverside, Chatham Waters, and Gillingham Waterfront) have already started construction. Not all of these are prospective regeneration schemes. Some are ongoing ones. Care must be taken not to double count ongoing development with proposed regeneration schemes.
- Rochester Riverside;
 - Innovation Park Medway;
 - Chatham Waterfront;
 - Strood Riverside;
 - Chatham Maritime;
 - Chatham Waters;
 - Gillingham Waterfront;
 - Isle of Grain;
 - Commercial Development;
 - Kingsnorth; and
 - Temple Waterfront.
- 7.5 The aspiration is for much of the above to be delivered through the Medway Development Company, a private limited company owned by the Council and incorporated 24 October 2017.
- 7.6 The sites are listed in *Medway: Waterfront University City: connecting innovation people and place; driving growth for all*. This is an evidence base document for the Medway 2035 Local Plan, and as such the sites are part of the draft strategy for growth.
- 7.7 As these sites are all part of emerging draft policy, they do not constitute ‘exceptional circumstances’ (i.e. none of them represent major development that is taking place outside policy, and which could justify a reduction in the housing target of the Local Plan). Medway are not, therefore, able justifiably to claim exceptional circumstances to reduce their housing requirement.

HOUSING INFRASTRUCTURE FUND BID (HIF)

- 7.8 Preparatory work on the Local Plan has identified that a lack of infrastructure capacity is a major obstacle to sustainably providing the minimum growth requirements within Medway.

In order to ensure the emerging Local Plan is likely to be found sound in so far as the sustainability of its development strategy is concerned, Medway are seeking funding to secure improvements to local infrastructure, and allow for future growth to be accommodated.

- 7.9 As detailed in the updated Local Development Scheme, Medway is planning to submit a bid of up to £170 million to the Government's Housing Infrastructure Fund (HIF) for funding strategic infrastructure development that can support the growth put forward within the emerging Local Plan.
- 7.10 Medway have described the bid as 'ambitious', and are expecting to submit it to Homes England this March, with a decision to be issued in May. If the bid is unsuccessful the scale of growth proposed (and the spatial strategy for its distribution) is likely to prove undeliverable on sustainability grounds.
- 7.11 In the event that it is successful, the bid will (according to the Local Development Scheme):
- Address a number of constraints and allow significant growth on the Hoo Peninsula to form part of Medway's development strategy.*
- 7.12 A report submitted to Cabinet on 10 July 2018 stated that this funding would allow for the potential development of 'up to 12,100 new homes on the Hoo Peninsula.' Against the Standard Methodology figure of 1,659 units, this represents 7.3 years supply. If the Plan is to be found sound, it will need to identify additional land to more than double this figure across 15 years (and this is assuming that all 12,100 homes will be delivered by 2035).
- 7.13 The Local Development Scheme states that the Regulation 19 draft of the Plan will be published in the summer of this year (June-August 2019). In the event that the HIF bid proves unsuccessful (in either full or part), it is unrealistic to expect that Medway will be in a position to publish a draft Plan within three months of a decision to the bid being reached.
- 7.14 Delay in the process is likely to have a significant impact on the emerging Plan (even if one discounts the effect it make have on the development strategy). The Plan's timescales are tight (especially in light of the fact that Regulation 18 consultations began two years ago): to submit the Plan in December following consultation in the summer may prove feasible, but the suggestion that the Plan is adopted in 2020 would appear optimistic (particularly considering housing circumstances noted later in this report).
- 7.15 Paragraph 22 of the NPPF states that strategic plans must have a 15 years timeframe from the point of adoption. If Medway are to keep their time horizon of 2035, they must adopt the Plan in (or before) 2020. Any slippage on this front would require an extension to the Plan period and attendant revisions to the development strategy. This is of itself likely to lengthen the Plan's preparation process further, serving only to exacerbate the problem.
- 7.16 Unless, therefore, Medway secure funding in full, and secure confirmation of this within the projected timeframes, it is likely that the Plan will struggle to be adopted before the end of 2020. In accordance with National Policy, this would require an extension to the Plan period, which would further constrain the local authority's ability to plan strategically for growth in the short term and also serve as further detriment to the rate of housing delivery and supply. The importance of the HIF bid to the Council's preferred strategy is made explicitly in paragraph 2.4 of Medway's Local Development Scheme, published in December 2018:
- If the bid is not successful, it is unlikely that such a scale of growth could be supported, and the council would need to look at different approaches and levels of development. This is critical to the content and strategy of the draft plan.*
- 7.17 The HIF bid a central part of the draft Plan's strategy, and the sustainable delivery of planned growth dependent upon it. Far from being able to justify a reduced housing

requirement, the HIF bid is a critical part of Medway's chosen strategy for meeting that figure.

CONSTRUCTION ACTIVITY

7.18 A review of new build developments that are currently being marketed provides a good indicator of major construction activity (both recent and current) within Medway.

Site	Units	Developer
Manor Park <i>Mierscourt Road, Rainham ME8 8PH</i>	134	Redrow Homes
Four Gun Field <i>Otterham Quay Lane, Rainham ME8 8QR</i>	52	Matthew Homes
Rochester Riverside <i>Land east of London/Dover Railway Line</i>	Up to 2,000	Countryside Properties, the Hyde Group, HTA <i>formerly South East England Development Agency</i>
Horsted Park <i>Maidstone Road, Chatham, Kent, ME1 2XQ</i>	265	Countryside Properties
Land At Southern Water Depot <i>Capstone Road, Chatham</i>	69	Brooke Homes Developments
Chatham Waters <i>Pier Road Gillingham Kent</i>	Up to 950	The Peel Group
Former Colonial House <i>Quayside, Chatham Maritime, Chatham, ME4 4YY</i>	Up to 253	Persimmon Homes
St Mary's Island <i>Gillingham, Chatham, ME4 3AP</i>	74	Countryside Properties
Church View <i>Stoke Road, Hoo</i>	Unknown	Taylor Wimpey
Land To The East And West Of Bells Lane <i>Hoo St Werburgh, Rochester, Kent</i>	232	Bellway Homes
Total	c. 4,000	

7.19 Some of these (such as Chatham Waters and Rochester Riverside) feature as part of the District's regeneration strategy, and are not coming forward outside of the draft Plan strategy (i.e. they are already factored into the supply). Further, this level of construction

is not enough to meet the District's requirements, and is part of a long-term failure (since at least 1991) to meet their housing requirement with any consistency.

- 7.20 Many of these sites (in particular the larger ones) are part of the District's strategy for regeneration and are therefore already factored into the supply. The total is not sufficient to justify a reduction in the minimum requirement.

CURRENT PLANNING APPLICATIONS

Land of Ratcliffe Highway (MC/18/3663)

- 7.21 In December 2018, a planning application for 210 dwellings at Land of Ratcliffe Highway was submitted by Gladman Homes. The planning statement submits:

- the Council is unable to demonstrate a 5 Year Housing Land Supply (citing the figure of between 3.9 and 4.3 years made by the Secretary of State in response to appeal APP/A2280/W/17/3175461 at Cliffe Woods);
- the adopted Local Plan is 'time expired'. Its housing policies are not designed to meet development needs beyond 2006;
- the emerging Local Plan has yet to be published in draft form, and weight cannot be attached to current publications relating to it; and
- the Council are not delivering enough affordable housing to meets 'pressing needs.'

Secretary of State's Assessment of the Housing Supply in Cliffe Woods Appeal

- 7.22 Regarding the supply figures quotes in the first bullet point, it should be noted that the appeal upon which the claim relies uses information that is out of date. Beyond this, it is worth highlighting two discrepancies.

- 7.23 The appellant claimed a supply of 2.75 years, the Council a supply of 'around 3'. As it was agreed to be below five years, the Inspector did not assess this matter in detail, stating:

Either way, the shortfall in supply remains significant. The Council also accepts that the housing targets in the Medway Local Plan no longer represent the objectively assessed housing need for the district, and that the settlement boundaries were only designed to plan for growth up to 2006. There is no dispute between the Council and appellant that Paragraph 14 of the Framework is triggered. Indeed, the housing shortfall is sufficient, of itself, to trigger the second part of Paragraph 14.

- 7.24 The Secretary of State sought to provide greater clarity, claiming that the authority is able to demonstrate between 3.9 and 4.3 years' supply. This uses the Standard Methodology requirement of 1,310 per annum (calculated using the 2016-based projections over the period 2018-2028 and a 20% buffer). Since then, the Government have stated that the 2016-based projections are not to be used for assessing the housing requirement with the Standard Methodology. The current Standard Methodology minimum requirement is assessed in greater detail later in this report, and is calculated at 1,659 dwellings per annum.

- 7.25 Notwithstanding the application of a lower requirement, the means by which the supply figure was calculated is unclear, the Secretary of State appears to use the 2016 Monitoring Report as a reference, which states the following housing supply:

	Supply	SoSt's Requirement	Years' Supply
2017-2021	5,817	7,860	3.7
2018-2022	5,618	7,860	3.6

Source: Medway Council, Authority Monitoring Report 2016

7.26 It is therefore altogether unclear how the Secretary of State has arrived at a supply of 'between 3.9 and 4.3 years', even with the reduced housing requirement established by the 2016-based household projections).

7.27 Putting aside reservations about the accuracy of the Secretary of State's assessment, it is common amongst the Planning Inspector, the Council and the Secretary of State that there is not a five year supply of housing within Medway.

7.28 Rapleys' assessment of Medway's housing supply is provided later in this report.

Other recent planning applications

7.29 Rapleys have been monitoring planning applications for residential schemes, going back as far as February 2014. In total (including the site above) there are 1,334 units that are pending determination across five planning applications.

7.30 In comparison, 1,607 units have been granted permission across eight applications.

7.31 A full table of these sites is shown at **Appendix 4**.

CONCLUSION

7.32 It is clear that there doesn't begin to be enough development in the short or medium term that is capable of substantially contributing towards Medway's housing requirement.

7.33 Further, much of what is coming forward has already been identified within emerging Policy.

7.34 Based on this analysis, exceptional circumstances do not exist to justify a reduction in the minimum housing requirement as calculated by the Standard Methodology.

8 HOUSING REQUIREMENT, DELIVERY, SUPPLY - ASSESSMENT

8.1 Rapleys updated their assessment in February 2019 to take into account the following:

- Revised NPPF 2018 (July 2018);
- Update to Revised NPPF 2018 (February 2019);
- Housing Delivery Test Rulebook (July 2018);
- Incorporation of Standard Methodology into the Planning Practice Guidance (September 2018);
- Updated Monitoring Report (December 2018);
- Revision of the StaM to account for new year (January 2019);
- Update to Standard Methodology, confirming application of 2014-based projections (February 2019); and
- Publication of Housing Delivery Test results (February 2019).

HOUSING REQUIREMENT

8.2 Applying the Standard Methodology (StaM), the minimum requirement for Medway is 1,659 dwellings per annum 2019-2029.

Housing requirement in Medway (2019)		
Baseline requirement (per annum)	Affordability Uplift	StaM (per annum)
1,311	26.56%	1,659

Sources: ONS, Sub-national household projections. 2014-based.
ONS, Ratio of median house price to median gross annual workplace-based earnings, 1997 to 2017

HOUSING DELIVERY

8.3 The NPPF requires local authorities to demonstrate that, over the previous three years, the required housing has been delivered in full. This is assessed using the Housing Delivery Test (HDT). The Government published the results of the HDT in February 2019. The *Housing Delivery Test Measurement Rule Book* was published July 2018, and from this it is possible to calculate results independently, and project future results for subsequent years. The methodology is described in detail within **Section 6** of this report.

Results

8.4 Medway's results are shown in full at **Appendix 2**. For the current year (highlighted in green) they are failing the HDT by over 50%. A summary table is shown below. Our findings are replicated in the results published by the Government in February 2019.

Medway's HDT Result (2018)	
Delivery	1,883
Requirement	3,997
HDT result	47%
Shortfall	2,114

- 8.5 Using the anticipated housing trajectory found in the council's latest monitoring report, Medway will fail the HDT in all years between now and 2029/30 (with the narrow exceptions of 2021/22 and 2022/23, which have an anticipated pass rate of 102% and 106% respectively).
- 8.6 When assessing the local authority's delivery trajectory against the Standard Methodology requirements, the presumption in favour of sustainable development will apply in 2019/20, and in every year after 2025. In summary, in the next 12 years:
- The Council will fail in 10 years (+80% of future results); and
 - The presumption will apply in six years (50% of future results).

HOUSING SUPPLY

Background and Preferred Approach

- 8.7 The method used by the local authority to calculate their housing land supply is described in the *Housing Supply Statement of Common Ground* (29 July 2016) submitted as part of the appeal against the refusal of planning application MC/14/3405. Permission was refused 02 April 2015 for:
- 475 dwellings (including affordable housing), commercial floorspace up to 200 sqm, sports pavilion up to 200 sqm, associated public open space, multi-functional green infrastructure, outdoor sports facilities, access, parking, etc. at Land west of Hoo St Werburgh.*
- 8.8 A request was made and subsequently declined for a copy of this document, but other documents are publically available that help to provide an indication of their thinking.
- 8.9 In the proof of evidence (now out of date) submitted by Medway's expert witness, the methodology for calculating the 5YHLS is summarised:
- *Requirement* - Council's 2015 SHMA (1,281 dpa);
 - *Shortfall distribution* - Sedgefield method;
 - *Buffer* - 20% owing to persistent under delivery of housing; and
 - *Application of buffer* - Before the shortfall is added to the requirement.
- 8.10 The point at which the buffer ought to be applied was an area of disagreement: Medway thought it be before the shortfall is included; the appellant afterwards. As it was common ground between both parties that the supply was under three years, the Inspector did not dwell on the matter, but did provide guidance which made it clear that the Council's position lacked evidence to justify their approach:
- A second point of difference between the parties is whether this buffer should be applied to previous shortfalls or not. I note that most recent decisions taken by the Secretary of State add any undersupply to the OAN before applying the buffer.*

Examples of such decisions include: APP/N4720/A/13/2200640, APP/T3725/A/14/2221613, and APP/R0660/A/13/2197532 & 2197529.

- 8.11 The ‘Sedgefield’ method of shortfall distribution spreads the historic underdelivery in full across the next five years. The alternative is the ‘Liverpool’ method, which applies the shortfall evenly over the remainder of the Plan period. Medway’s emerging Plan has a period of 2012-2035.
- 8.12 Based on the above understanding, Rapleys have used the following figures to calculate the housing supply:
- *Requirement* - The Standard Methodology figure (1,659 dpa);
 - *Shortfall distribution* - Sedgefield (the Liverpool method is provided for comparative purposes);
 - *Buffer* - 20% owing to the results of the HDT; and
 - *Application of buffer* - After the shortfall is added to the requirement.

Medway’s Current Housing Land Supply

- 8.13 To establish Medway’s Land Supply, one requires the future supply, the historic shortfall, and the current requirement:
- *Future Supply* - Medway’s most recent monitoring report was published December 2018, and provides the housing trajectory for 2018/19 up to 2032/33. It claims a supply of 7,710 units over the period 2018/19 to 2022/23.
 - *Historic Shortfall* - this has been by assessing the rate of delivery against the requirement, calculated using the method advocated by the HDT: taking the average (per annum) increase in household projections over a ten-year period. For example, considering the year 2012/13, the average growth per annum over the period 2012-2022 has been assessed using the 2012-based household projections. Subsequent years dealt with similarly up to 2018 (at which point the StaM is used). Measuring the requirement against delivery, there is an historic shortfall of 4,488 units from the start of the period to the present (2012/13 to 2017/18),
 - *Current Requirement* - the StaM currently states a per annum requirement of 1,659 units.
- 8.14 Based on Rapleys findings (shown in full at **Appendix 3**), Medway have a housing supply of 2.51 years.
- 8.15 This is a total supply of 7,710 over the period 2018-2023, assessed against a need of 15,340 (as assessed using a 20% buffer and the Sedgefield method of incorporating the shortfall).

Medway’s Two Housing Trajectories

- 8.16 Within their Monitoring Report of December 2018, Medway put forward two different housing trajectories: one which takes sites that are either allocated or have an extant permission (the ‘deliverable’ trajectory); and a higher assessment that includes additional sites (the ‘aspirational’ trajectory).
- 8.17 The foregoing assessment uses the aspiration figure as a representation of the Council’s best case scenario. However, if one applies the deliverable trajectory, the supply falls from 2.51 to 1.78 years. This is shown in the Housing Supply assessment at **Appendix 5**.
- 8.18 The glossary of the 2019 NPPF defines ‘deliverable’ as follows:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

- 8.19 Medway's 'aspirational' supply is one which - by the Council's own admission - includes sites that are not 'deliverable' as understood by the NPPF. The extent to which such a trajectory represents future reality is indicated by the gulf that exists between the aspired and deliverable trajectories. In the absence of any clear indication of how Medway are going sustainably to deliver their aspiration trajectory, the figure should be treated with appropriate caution.
- 8.20 The lower supply shown in the 'deliverable' trajectory also has a detrimental impact on the anticipated HDT results. These are included within **Appendix 5**.

9 CONCLUSIONS

ADOPTED PLAN

- 9.1 The local authority's current Local Plan had a plan period up to 2006, and has been 'time expired' for over ten years. Policies were saved in 2007, but these have not been reviewed since the publication of the NPPF in 2012. The adopted development plan is out of date.

EMERGING PLAN

- 9.2 The development strategy for the emerging Plan is reliant upon the successful of a HIF bid, the result of which is expected in May 2019. Pending the outcome (and the date when this is made public) the emerging Plan may have to re-examine its strategy, and may have to extend its Plan period in order to bring it into line with the requirements of national policy.

INFRASTRUCTURE REQUIREMENTS

- 9.3 Even if the HIF bid is successful (and assuming that all of the housing it unlocks can be delivered within the Plan period), it is able to allow for the delivery of less than half of the housing requirement for the 15 years period 2020-2035 (the anticipated year of adoption). Medway therefore need to identify a substantial quantity of additional land if the Plan is to be found sound.

MONITORING AND DELIVERY

- 9.4 There is evidence of persistent underdelivery of housing delivery since 1991. Over the emerging Plan period, Rapleys have calculated an undersupply of 5,443.
- 9.5 The Standard Methodology housing requirement for the period commencing 2019 is 1,659 dwellings per annum. Despite this, the most recent Authority Monitoring Report (published December 2018) assesses future supply against two housing requirements: 1,000 and 1,281. The emerging Plan will have to account for a far higher (minimum) annual requirement.

EXCEPTIONAL CIRCUMSTANCES

- 9.6 There is insufficient development in the pipeline/under construction to meet the local minimum housing requirement. Exceptional circumstances do not exist to justify a reduction in the minimum housing requirement, as using by the Standard Methodology.

CURRENT HOUSING SITUATION

- 9.7 Using methodologies put forward by the Government, Rapleys have assessed the current housing situation as follows:
- The housing requirement is 1,659 dwellings per annum (dpa);
 - The completion rate against the Housing Delivery Test is 47%; and
 - The housing land supply equates to 2.51 years.
- 9.8 These figures are fully explained and sourced within the Appendices.

10 AFFORDABLE HOUSING

10.1 The following sections provide an overview of the rate of need, delivery and supply of affordable housing within Medway.

11 AFFORDABLE HOUSING - NEED

11.1 The 2015 SHMA identified a need of 744 affordable dwellings per annum. Rapleys have reviewed the data, and suggest that the gross newly arising need (NAN) per year is 1,738 over the period 2020-2035. This has been calculated using the formula below, taken from the PPG:

$$\begin{aligned} & \text{Affordable need} \\ &= (\text{no. of households formed} \times \text{proportion unable to afford market housing}) \\ & \quad + \text{no. of existing households falling into need} \end{aligned}$$

NO. OF HOUSEHOLDS FALLING INTO NEED

11.2 The Government does not publish clear evidence showing the number of households falling into need each year. The PPG therefore suggest a review of past trends and a current estimate of the number of:

- homeless households;
- those in priority need who are currently housed in temporary accommodation;
- households in over-crowded housing;
- concealed households;
- existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and
- households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.

11.3 In the absence of clear data for all these metrics, Rapleys have used the number of households on the housing waiting lists in Medway for each year since 2012, and established an average rate of annual increase over that timeframe. This is shown in the table below. On this basis, the number of households falling into need each year has been estimated at 1,193.

Households on housing waiting lists							
	2012	2013	2014	2015	2016	2017	Average
Total	13,939	19,407	18,773	19,320	20,651	19,905	n/a
Change per annum		5,468	-634	547	1,331	-746	1,193

Source: MHCLG, OpenData. Homelessness - Households on Housing Waiting Lists

NO. OF HOUSEHOLDS FORMED (2020-2035)

11.4 Using the 2014-based household projections, and taking the Plan's anticipated year of adoption up to the end of the Plan period the average rate of household growth over the Plan period is 1,297.

No. of households formed (2020-2035)			
2020	2035	Change	Average
11,9739	13,9201	19,462	1,297

Source: ONS, Sub-national household projections. 2014-based.

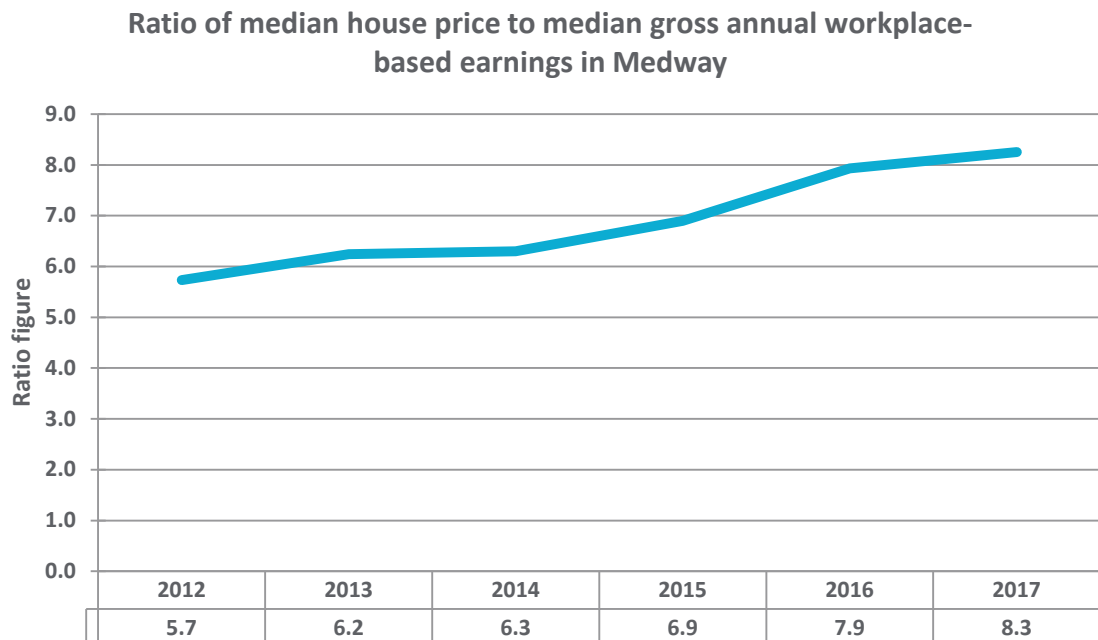
PROPORTION UNABLE TO AFFORD MARKET HOUSING

11.5 There is no clear way of calculating this. The 2015 SHMA provided a rate of 45% based on the following documents and assumptions:

- CACI Paycheck data;
- Housing cost thresholds for home purchase (at lower quartile prices);
- Market and affordable rental costs (for 2&3 bedroom properties);
- Affordability constitutes not more than 30% of income being spent on housing.

11.6 Some of this data is no longer up to date. Attention is drawn to the following:

- The income threshold suggested by the 2007 SHMA Guidance is 25%, not the 30% that the 2015 assessment uses;
- The affordability ratio (shown in the table below) has risen considerably since the date of the assessment.



- 11.7 In light of this, the rate of 45% is considered to be conservative figure. This should be borne in mind.

FINAL CALCULATION

- 11.8 Taking these together, and applying the methodology within the PPF, the gross affordable NAN is 1,738 dwellings per annum.

Gross NAN per year in Medway (2020-2035)	
No. of households formed (average per annum, 2020-2035)	1,297
Proportion unable to afford market housing	42%
Existing households falling into need	1,193
Newly arising need (NAN)	1,738

Sources: ONS, Sub-national household projections. 2014-based
GVA Bilfinger, North Kent SHMA 2015
MHCLG, OpenData. Homelessness - Households on Housing Waiting Lists

- 11.9 This is a gross figure (and one that is higher than the StaM requirement of 1,659 dpa). It is wholly unrealistic to expect that Medway meet this in full (despite the fact that it fails to take into account potential shortfall).
- 11.10 In a 'policy on' scenario (taking into account the Council's circumstances, its administrative area, and the historic backlog and shortfall) it is considered reasonable that Medway seek to provide at least 50% of this requirement.
- 11.11 With this in mind, it is considered that the absolute minimum affordable housing requirement within Medway be 869 dwellings per annum.

Affordable housing need in Medway (per annum)				
2015 SHMA	Gross NAN (Rapleys)	50% of NAN	StaM	Percentage of StaM
744	1,738	869	1,659	52%

Source: Preceding tables

12 AFFORDABLE HOUSING - DELIVERY

- 12.1 The latest Authority Monitoring Reports state that 937 affordable units have been completed since 2012 (the state of the emerging Plan period).

Affordable housing delivery in Medway			
	Gross affordable units	Gross completions	Proportion of affordable
2012/13	211	635	33.2%
2013/14	157	597	26.3%
2014/15	174	532	32.7%
2015/16	172	630	27.3%
2016/17	91	675	13.5%
2017/18	132	695	19.5%
Total	937	3,764	24.9%

Source: Medway Council, Authority Monitoring Reports 2017 and 2018

13 AFFORDABLE HOUSING - SHORTFALL

- 13.1 Taking the data provided in the tables above, Medway have an estimated affordable housing shortfall of 5,106 units over the period 2012-2017. 5,966 households were added to the waiting list for housing, and this is weighted against a total provision of 860 units over that time period.

Affordable housing shortfall	
2012-2017	Increase
Households added to waiting lists	5,966
Affordable completions	937
Shortfall (2012-2017)	5,029

Source: Preceding tables

- 13.2 Taking the estimated shortfall of 5,029 over the period 2012-2017, this averages to an underdelivery of 1,006 affordable dwellings per annum.

14 AFFORDABLE HOUSING - CONCLUSION

- 14.1 Based on calculations of affordable housing need within Medway, it is clear that there is pressing need to radically increase the rate of delivery within the area. Against the number of affordable units completed over the period 2012-2017, the number of households added to waiting lists represents 637% of the rate of delivery.

14.2 Based on the foregoing analysis, Rapleys consider the affordable housing situation within Medway to be as follows:

- The affordable housing requirement is (conservatively) 869 per annum; and
- The existing shortfall is 5,029 over the period 2012-2017.

Appendix 01

MEDWAY - AUTHORITY MONITORING REPORT, DECEMBER 2018. HOUSING EXTRACT



Medway Authority Monitoring Report 2018

1st April 2017 — 31st March 2018

Volume 2 - Tables

December 2018

4) Housing Land Availability Tables and Data



Completions on Previously Developed Land

	2013/14	2014/15	2015/16	2016/17	2017/18
Small total	61	61	93	110	82
Small PDL	33	41	72	75	56
Large allocations total	209	119	149	70	61
Large allocations PDL	37	3	47	42	61
Large windfalls total	309	303	311	462	537
Large windfalls PDL	299	265	292	428	484
Total completions	579	483	553	642	680
Total PDL	369	309	411	549	601
PDL Proportion of all completions (%)	63.7%	64%	74.3%	85.5%	88.4%

Small site completions

The 5-year average of net housing completions on small sites is just over 81 per annum (net), of these an average of 55 per annum are on previously developed land.

Windfall completions – large sites

The 5-year average on windfall sites is 384 per annum (net), of these of these over 353 per annum (92%) are on previously developed land.



Housing Trajectory

The table below shows a pipeline projection, which includes all sites with planning permission (not started/under construction, split into large and small applications) and also existing Medway Local Plan 2003 Allocations. Sites from the Strategic Land Availability Assessment (SLAA) are shown on a separate line. Full details of these SLAA sites can be found in Section 8 on [page 169](#).

Windfall Allowance

The council will be making a windfall allowance in the 5 year land supply. This is derived from the average of large and small windfall completions over the past 10 years, but does not include any site that was a residential garden area, or has already been identified in the Strategic Land Availability Assessment, Urban Capacity or previous planning document. This windfall allowance will only be added to years 3, 4 and 5 of the land supply, to allow time for planning permission to be applied for and granted.

Year	12/13	13/14	14/15	15/16	16/17	17/18
All actual completions	565	579	483	553	642	680

Year	18/19	19/20	20/21	21/22	22/23	0-5 yrs	5-10 yrs	10-15 yrs	15+ yrs
Large site apps	778	1442	1420	797	654	5091	1691	51	210
Small site apps	115	66	91	38	18	328	0	0	1
MLP Allocation	0	0	0	0	70	70	177	5	106
SLAA pipeline sites	0	26	367	448	786	1627	3927	1695	953
Windfall allowance	0	0	198	198	198	594	0	0	0
TOTAL	893	1534	2076	1481	1726	7710	5795	1751	1270

Phasing over the next 15 years (commitments on allocations, large and small sites)*			
5 year period	0-5 years	5-10 years	10-15 years
No of dwellings	5489	1868	56

*figures in this table do not include SLAA sites or a windfall allowance



Housing Target

In June 2014, the Council adopted a Housing Position Statement that included the review of its housing requirement. Work commissioned on household projections indicated that provision should be made for at least 24,000 new homes to be delivered between 2011 and 2035 - an average of 1,000 a year. This figure was approved by Cabinet as the basis of the council's housing requirement.

In January 2015, the council jointly commissioned a Strategic Housing and Economic Needs Assessment (SHENA) with Gravesham Borough Council. This work produced an updated Strategic Housing Market Assessment that included the calculation of an Objectively Assessed Need for housing over the plan period (2012-2035). This was assessed to be 29,463 homes, or an annual need of 1,281 homes.

Going forward, for future years the Government will be providing Local Housing Need figures for each local authority. These are expected to be higher than those calculated previously; this will be reported upon in future Authority Monitoring Reports.

The tables on the following pages show the trajectory using the 1,000 and 1,281 targets:



Assuming a requirement of 1000 dwellings per annum

	Cumulative Completions to Date					
	Yr1	Yr2	Yr3	Yr4	Yr5	Yr6
	2012/13	2013/14	2014/15	2015/16	2016/17	2017/8
Cumulative annual requirement	1000	2000	3000	4000	5000	6000
Cumulative completed	565	1144	1627	2180	2822	3502
Surplus/deficit	-435	-856	-1373	-1820	-2178	-2498

	Cumulative Phasing														
	Yr7	Yr8	Yr9	Yr10	Yr11	Yr12	Yr13	Yr14	Yr15	Yr16	Yr17	Yr18	Yr19	Yr20	Yr21
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
Cumulative annual requirement	7000	8000	9000	10000	11000	12000	13000	14000	15000	16000	17000	18000	19000	20000	21000
Projected completions in addition to previous completions	4395	5929	8005	9486	11212	12407	13511	14805	16031	17007	17453	17781	18116	18446	18758
Surplus/deficit	-2605	-2071	-995	-514	212	407	511	805	1031	1007	453	-219	-884	-1554	-2242

	Completions to date					
	Yr1	Yr2	Yr3	Yr4	Yr5	Yr6
	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Completions	565	579	483	553	642	680
Annual housing requirement	1000	1000	1000	1000	1000	1000

	Future Phasing														
	Yr7	Yr8	Yr9	Yr10	Yr11	Yr12	Yr13	Yr14	Yr15	Yr16	Yr17	Yr18	Yr19	Yr20	Yr21
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
Phasing	893	1534	2076	1481	1726	1195	1104	1294	1226	976	446	328	335	330	312
Annual housing requirement	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000



ALTERNATIVE Assuming a requirement of 1281 dwellings per annum

	Cumulative Completions to Date					
	Yr1	Yr2	Yr3	Yr4	Yr5	Yr6
	2012/13	2013/14	2014/15	2015/16	2016/17	2017/8
Cumulative annual requirement	1281	2562	3843	5124	6405	7686
Cumulative completed	565	1144	1627	2180	2822	3502
Surplus/deficit	-716	-1418	-2216	-2944	-3583	-4184

	Cumulative Phasing														
	Yr7	Yr8	Yr9	Yr10	Yr11	Yr12	Yr13	Yr14	Yr15	Yr16	Yr17	Yr18	Yr19	Yr20	Y21
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
Cumulative annual requirement	8967	10248	11529	12810	14091	15372	16653	17934	19215	20496	21777	23058	24339	25620	26901
Projected completions in addition to previous completions	4395	5929	8005	9486	11212	12407	13511	14805	16031	17007	17453	17781	18116	18446	18758
Surplus /deficit	-4572	-4319	-3524	-3324	-2879	-2965	-3142	-3129	-3184	-3489	-4324	-5277	-6223	-7174	-8143

	Completions to date					
	Yr1	Yr2	Yr3	Yr4	Yr5	Yr6
	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Completions	565	579	483	553	642	680
Annual housing requirement	1281	1281	1281	1281	1281	1281

	Future Phasing														
	Yr7	Yr8	Yr9	Yr10	Yr11	Yr12	Yr13	Yr14	Yr15	Yr16	Yr17	Yr18	Yr19	Yr20	Yr21
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
Phasing	893	1534	2076	1481	1726	1195	1104	1294	1226	976	446	328	335	330	312
Annual housing requirement	1281	1281	1281	1281	1281	1281	1281	1281	1281	1281	1281	1281	1281	1281	1281

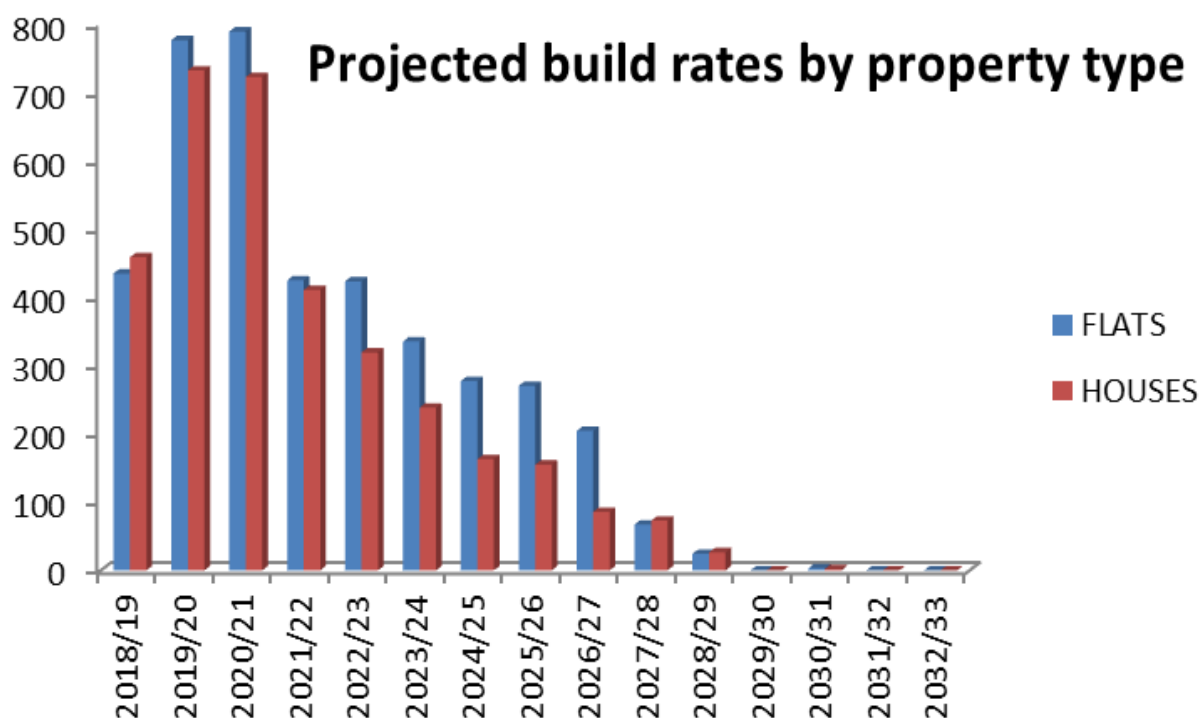


Projected build rates to 2032/33

The developments expected to deliver the most new dwellings over the next 5 years are at the following locations:- Chatham Waterfront, Victory Pier, Chatham Docks, Rochester Riverside, Strood Waterfront, St Marys Island, Stoke Road Hoo, Bells Lane Hoo, Colonial House Chatham Maritime, the Former Barracks Dock Road, Chatham, Mierscourt Road, Rainham, Gibraltar Farm, Lordswood, North of Peninsular Way, Chattenden and Otterham Quay Lane , Rainham.

Projected build rates to 2032/33															
Dwells	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
Flats with pp	434	776	789	424	388	302	252	240	204	67	24	0	0	0	0
Estmtd alloc flats	0	0	0	0	35	33	25	30	0	0	0	0	3	0	0
Total Flats	434	776	789	424	423	335	277	270	204	67	24	0	3	0	0
House with pp	459	732	722	411	284	204	138	125	86	73	27	0	0	0	0
Estmtd alloc houses	0	0	0	0	35	34	25	30	0	0	0	0	2	0	0
Total House	459	732	722	411	319	238	163	155	86	73	27	0	2	0	0
TOTAL	893	1508	1511	835	742	573	440	425	290	140	51	0	5	0	0

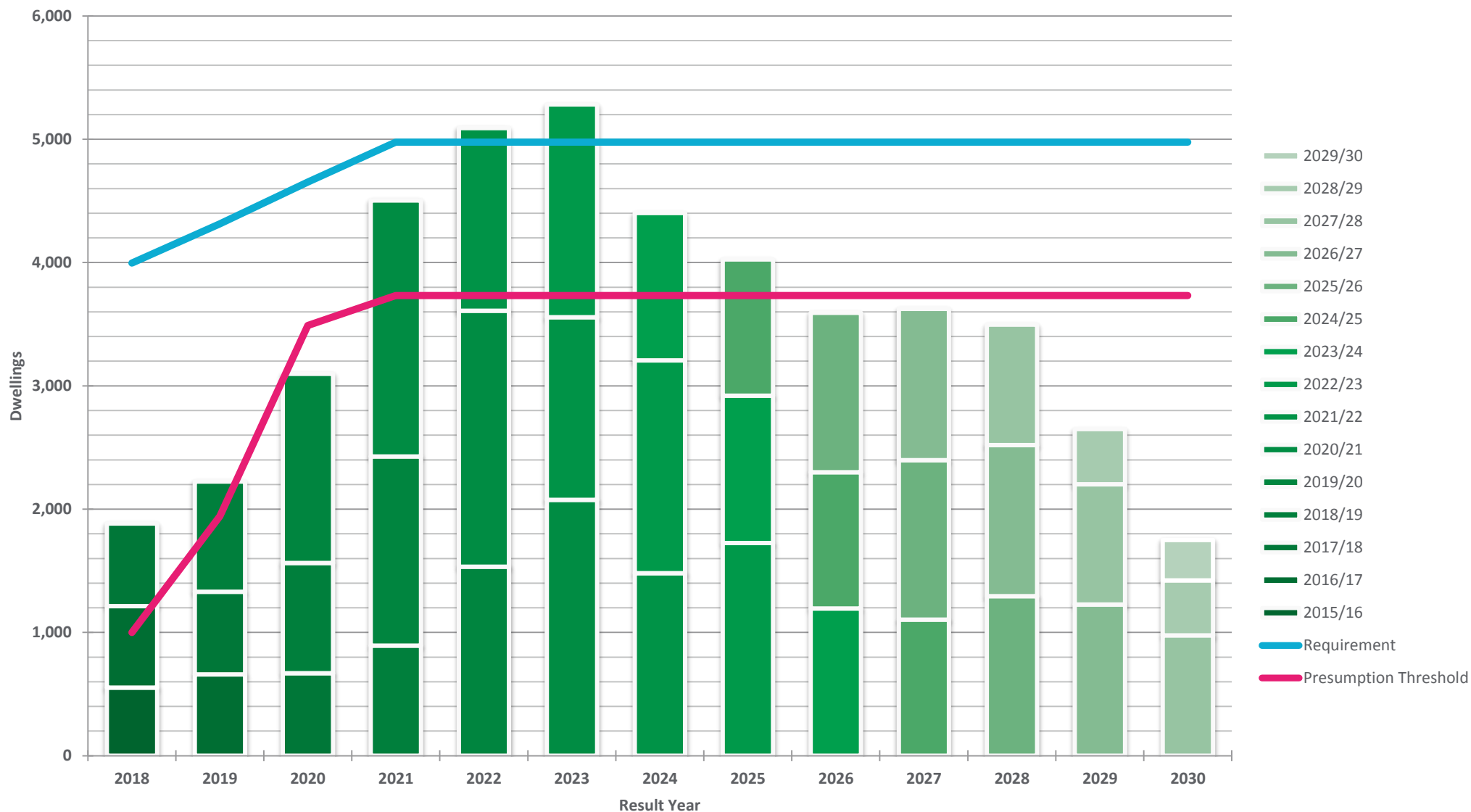
Please note, these are only sites with permission or existing allocations from the Medway Local Plan 2003; no windfalls or sites from the Strategic Land Availability Assessment have been included.



Appendix 02

RAPLEYS' ASSESSMENT OF MEDWAY'S HOUSING DELIVERY TEST RESULT

Medway - Housing Delivery Test Results - Aspirational Trajectory



Summary of Medway's Housing Delivery Test Results (aspirational trajectory)

	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Delivery	1,883	2,223	3,096	4,503	5,091	5,283	4,402	4,025	3,593	3,624	3,496	2,648	1,750
Requirement	3,997	4,315	4,652	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977
Presumption threshold	999	1,942	3,489	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733
HDT result	47%	52%	67%	90%	102%	106%	88%	81%	72%	73%	70%	53%	35%
Shortfall	2,114	2,092	1,556	474	0	0	575	952	1,384	1,353	1,481	2,328	3,227

Source: Base figures taken from MHCLG, ONS, and Medway Council. Rapleys' workings.

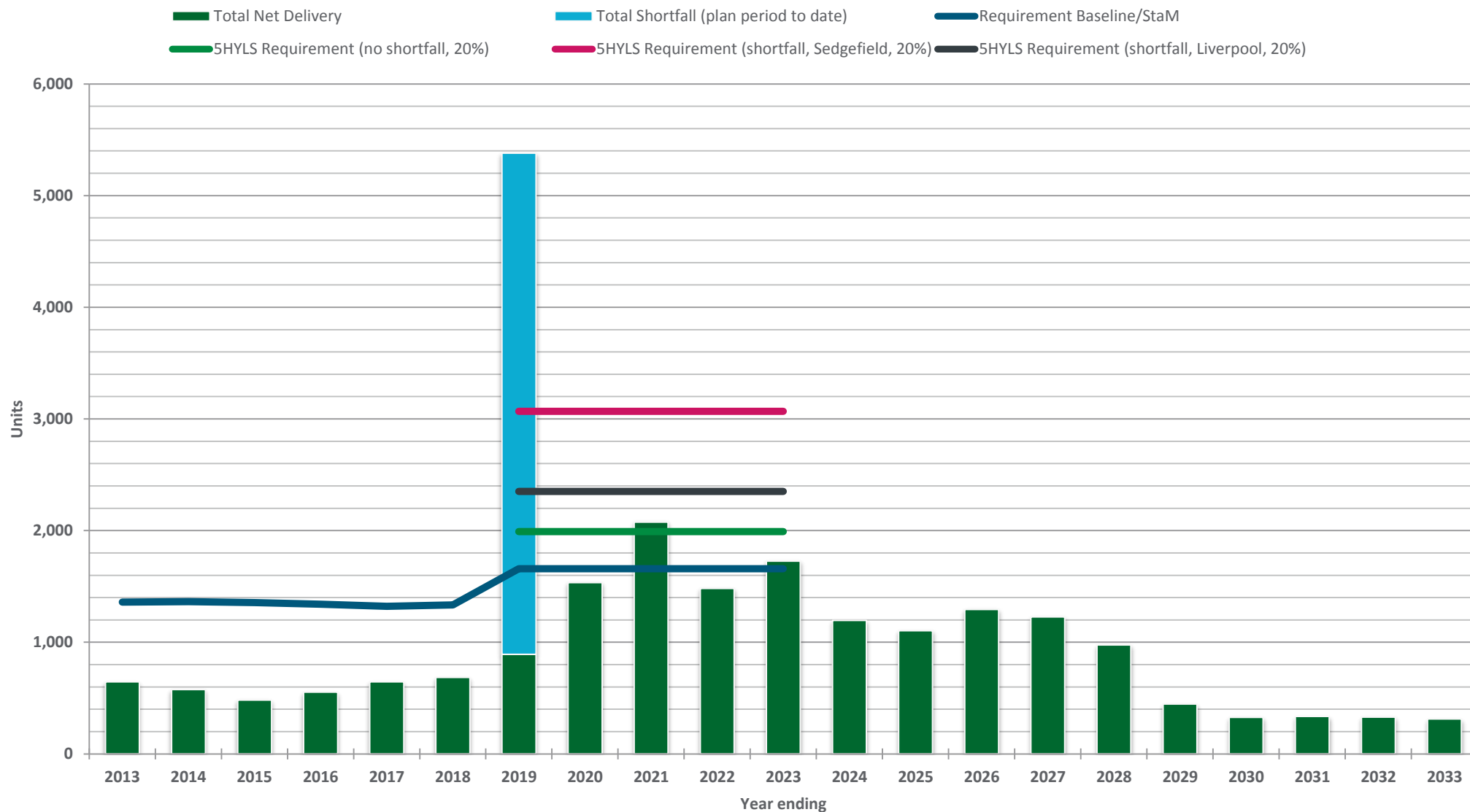
	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Medway - Delivery - Aspirational trajectory															
Housing (net)	553	646	685	893	1,534	2,076	1,481	1,726	1,195	1,104	1,294	1,226	976	446	328
Student Communal (against national average)	0	46	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Communal (against national average)	0	-31	-16	0	0	0	0	0	0	0	0	0	0	0	0
Total (net, per annum)	553	661	669	893	1,534	2,076	1,481	1,726	1,195	1,104	1,294	1,226	976	446	328
Total (net, three years)	n/a	1,214	1,883	2,223	3,096	4,503	5,091	5,283	4,402	4,025	3,593	3,624	3,496	2,649	1,750
Medway - Requirement															
HDT requirement (per annum)	1,341	1,322	1,334	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659
HDT requirement (three year)	n/a	n/a	3,997	4,315	4,652	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977
Presumption threshold	n/a	n/a	999	1,942	3,489	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733
HDT results (100% indicating full delivery)	n/a	n/a	47%	52%	67%	90%	102%	106%	88%	81%	72%	73%	70%	53%	35%
Shortfall	n/a	n/a	2,114	2,092	1,556	474	0	0	575	952	1,384	1,353	1,481	2,328	3,227

Source: Base figures taken from MHCLG, ONS, and Medway Council. Rapleys' workings.

Appendix 03

RAPLEYS' ASSESSMENT OF MEDWAY'S HOUSING LAND SUPPLY

Housing Supply in Medway - Aspirational Trajectory



Medway's 5 Year Housing Land Supply Position (aspirational trajectory)

	2018/19	2019/20	2020/21	2021/22	2022/23	Total	Years' Supply
Supply	893	1,534	2,076	1,481	1,726	7,710	
Requirement <i>Baseline/ StaM</i>	1,659	1,659	1,659	1,659	1,659	8,295	
Shortfall <i>Per annum</i>	766	151	148	824	917	2,806	
Total Shortfall <i>plan period to date</i>	4,488					4,488	
5YHLS Requirement <i>no shortfall, 20%</i>	1,991	1,991	1,991	1,991	1,991	9,954	3.87
5HYLS Requirement <i>shortfall, Sedgefield, 20%</i>	3,068	3,068	3,068	3,068	3,068	15,340	2.51
5HYLS Requirement <i>shortfall, Liverpool, 20%</i>	2,350	2,350	2,350	2,350	2,350	10,313	3.28

Source: Base figures taken from Medway AMR (supply) and MHCLG. Rapleys' working.

Medway's Housing Delivery and Supply, 2012 to 2033 (aspirational trajectory)

	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Total Net Delivery (<i>per annum</i>)	645	576	483	553	646	685	893	1,534	2,076	1,481	1,726
Requirement (<i>per annum</i>)	1,360	1,364	1,355	1,341	1,322	1,334	1,659	1,659	1,659	1,659	1,659
Shortfall (<i>per annum</i>)	715	788	872	788	676	649	766	125	-417	178	-67
Shortfall (<i>cumulative</i>)	715	1,503	2,375	3,163	3,839	4,488	5,254	5,379	4,962	5,140	5,073
	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	
Total Net Delivery (<i>per annum</i>)	1,195	1,104	1,294	1,226	976	446	328	335	330	312	
Requirement (<i>per annum</i>)	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	
Shortfall (<i>per annum</i>)	464	555	365	433	683	1,213	1,331	1,324	1,329	1,347	
Shortfall (<i>cumulative</i>)	5,537	6,092	6,457	6,890	7,573	8,786	10,117	11,441	12,770	14,117	

Source: Base figures taken from Medway AMR (delivery years 2018/19 onwards) and MHCLG. Rapleys' workings.

Appendix 04

PENDING AND RECENTLY APPROVED HOUSING PROPOSALS WITHIN MEDWAY

APPROVED AND PENDING APPLICATIONS

Medway District Council

January 2019

Sites with planning permission			
Site	No. of Units	Allocation in existing or emerging policy	Date of approval
Land at Station Road	90	No	18 July 2014 (appeal)
Land At Otterham Quay Lane	300	Yes	27 February 2017
Land South Of Ratcliffe Highway	232	No	10 November 2017
Berengrave Nursery	121	Yes	15 March 2018
Stoke Road Business Centre	200	No	14 August 2018
Anchorage House	83	No	24 August 2018
Gibraltar Farm	450	No	26 September 2018
Chatham Golf Centre	131	Yes	10 October 2018
Total	1,607		

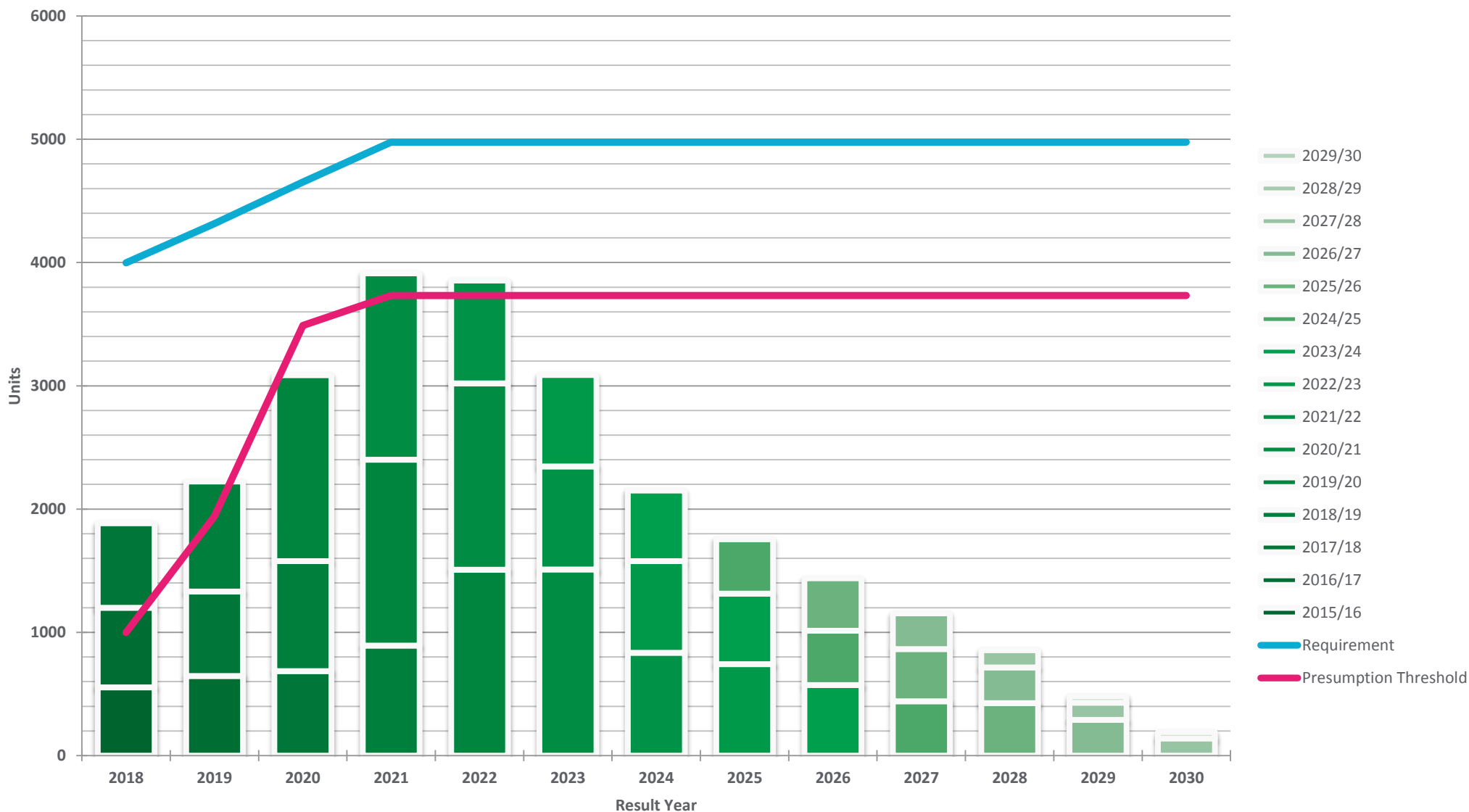
Live Applications			
Site	No. of Units	Allocation in existing or emerging policy	Validation Date
Chattenden Lane	530	Identified as potential allocation in emerging plan. Identified as unsuitable in the 2017 SLAA	05 July 2017 (appeal)
Land South Of Lower Rainham Road	202	Yes	19 June 2018
Land West Of Town Road	92	No	11 October 2018
Land North Of Beaufort Road	300	Yes	12 December 2018
Land At Ratcliffe Highway	210	Yes	24 December 2018
Total	1,334		

Sites being promoted	
Site	Units
Land South of Lower Rainham Road	
Lower Twydall	
Gillingham	600
Kent	
Land between Lower Rainham Road and Grange Road	
Rainham	
Gillingham	200
Kent	

Appendix 05

SUPPLY AND DELIVERY TRAJECTORIES USING MEDWAY'S 'DELIVERABLE' SUPPLY

Medway - Housing Delivery Test Results - Deliverable Trajectory



Summary of Medway's Housing Delivery Test Results (aspirational trajectory)

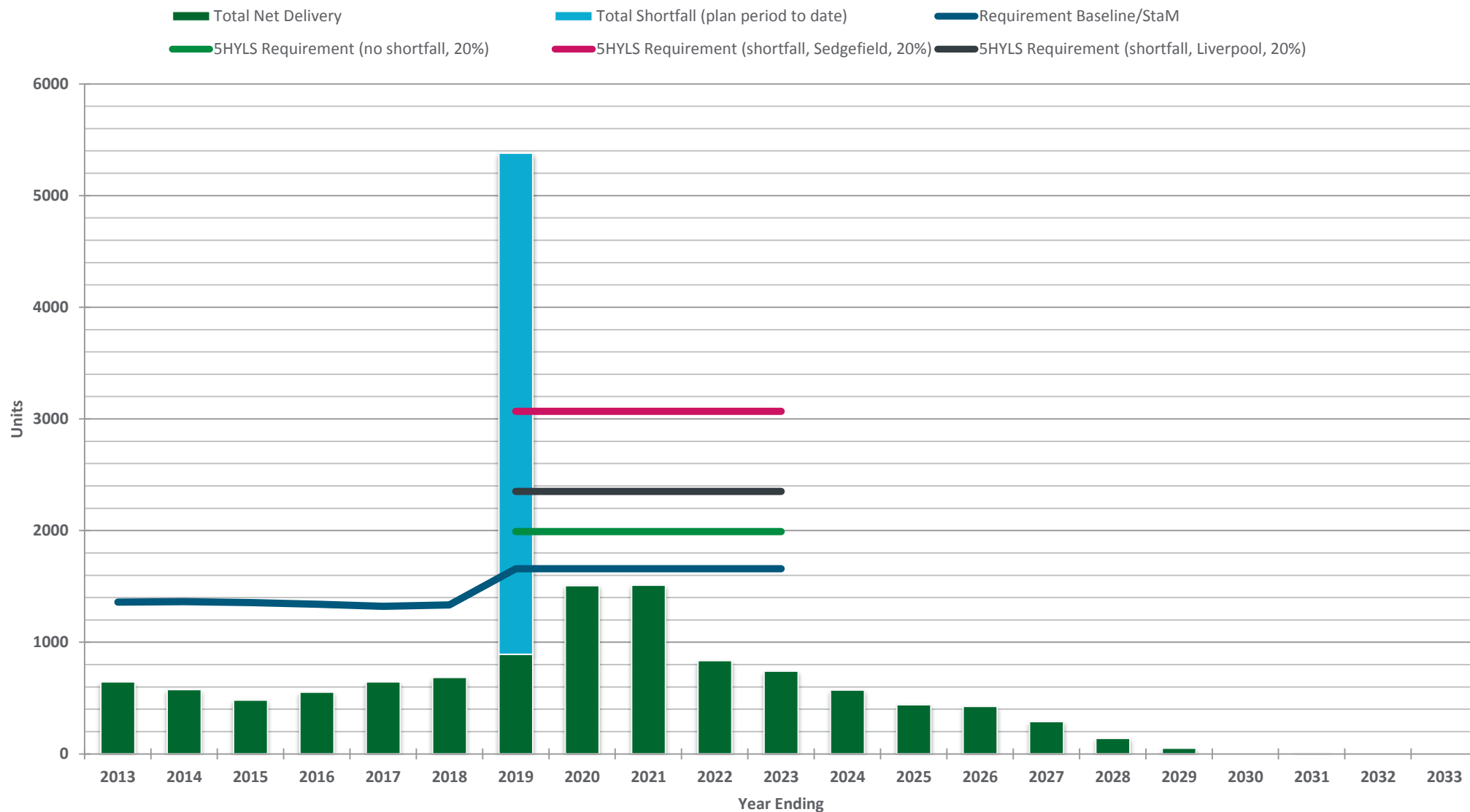
	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Delivery	1,883	2,223	3,070	3,912	3,854	3,088	2,150	1,755	1,438	1,155	855	481	191
Requirement	3,997	4,315	4,652	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977
Presumption threshold	999	1,942	3,489	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733
HDT result	47%	52%	66%	79%	77%	62%	43%	35%	29%	23%	17%	10%	4%
Shortfall	2,114	2,092	1,582	1,065	1,123	1,889	2,827	3,222	3,539	3,822	4,122	4,496	4,786

Source: Base figures taken from MHCLG, ONS, and Medway Council. Rapleys' workings.

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Medway - Delivery - Deliverable trajectory															
Housing (net)	553	646	685	893	1508	1511	835	742	573	440	425	290	140	51	0
Student Communal (against national average)	0	46	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Communal (against national average)	0	-31	-16	0	0	0	0	0	0	0	0	0	0	0	0
Total (net, per annum)	553	661	669	893	1508	1511	835	742	573	440	425	290	140	51	0
Total (net, three years)	n/a	1,214	1,883	2,223	3,070	3,912	3,854	3,088	2,150	1,755	1,438	1,155	855	481	191
Medway - Requirement															
HDT requirement (per annum)	1,341	1,322	1,334	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659
HDT requirement (three year)	n/a	n/a	3,997	4,315	4,652	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977	4,977
Presumption threshold	n/a	n/a	999	1,942	3,489	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733	3,733
HDT results (100% indicating full delivery)	n/a	n/a	47%	52%	66%	79%	77%	62%	43%	35%	29%	23%	17%	10%	4%
Shortfall	n/a	n/a	2,114	2,092	1,582	1,065	1,123	1,889	2,827	3,222	3,539	3,822	4,122	4,496	4,786

Source: Base figures taken from MHCLG, ONS, and Medway Council. Rapleys' workings.

Housing Supply in Medway - Deliverable Trajectory



Medway's 5 Year Housing Land Supply Position (deliverable trajectory)

	2018/19	2019/20	2020/21	2021/22	2022/23	Total	Years' Supply
Supply	893	1,508	1,511	835	742	5,489	
Requirement <i>Baseline/ StaM</i>	1,659	1,659	1,659	1,659	1,659	8,295	
Shortfall <i>Per annum</i>	766	151	148	824	917	2,806	
Total Shortfall <i>plan period to date</i>	4,488					4,488	
5YHLS Requirement <i>no shortfall, 20%</i>	1,991	1,991	1,991	1,991	1,991	9,954	2.76
5HYLS Requirement <i>shortfall, Sedgefield, 20%</i>	3,068	3,068	3,068	3,068	3,068	15,340	1.78
5HYLS Requirement <i>shortfall, Liverpool, 20%</i>	2,350	2,350	2,350	2,350	2,350	11,749	3.28

Source: Base figures taken from Medway AMR (supply) and MHCLG. Rapleys' working.

Medway's Housing Delivery and Supply, 2012 to 2033 (deliverable trajectory)

	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Total Net Delivery (<i>per annum</i>)	645	576	483	553	646	685	893	1,508	1,511	835	742
Requirement (<i>per annum</i>)	1,574	1,352	1,354	1,343	1,333	1,345	1,659	1,659	1,659	1,659	1,659
Shortfall (<i>per annum</i>)	929	776	871	790	687	660	766	151	148	824	917
Shortfall (<i>cumulative</i>)	929	1,705	2,576	3,366	4,053	4,713	5,479	5,630	5,778	6,602	7,519
	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	
Total Net Delivery (<i>per annum</i>)	573	440	425	290	140	51	0	5	0	0	
Requirement (<i>per annum</i>)	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	1,659	
Shortfall (<i>per annum</i>)	1,086	1,219	1,234	1,369	1,519	1,608	1,659	1,654	1,659	1,659	
Shortfall (<i>cumulative</i>)	8,605	8,895	9,353	9,851	10,580	11,501	12,500	13,388	14,896	16,407	

Source: Base figures taken from Medway AMR (delivery years 2018/19 onwards) and MHCLG. Rapleys' workings.