

HOUSING

- 4.1 A core task of the new Local Plan is to provide for the housing needs of Medway's communities over the plan period. As demand for housing has increased across the country, costs have risen and many people from different sectors of society have difficulties in finding a suitable place to live. Although house prices in Medway are lower than neighbouring boroughs, and some of the most affordable in the south east, they have been rising in recent years, placing many properties beyond the reach of local people. The private rented sector doubled in Medway between 2001 and 2011, partly linked to the growing student population, but also reflecting demand from people unable to access home ownership. This wider trend is seen nationally, and there has been an expansion of the 'build to rent' sector. As Medway's population grows and ages, there is a need to ensure the right mix of housing is available for local people.
- 4.2 The Government has put increasing the supply of housing at the centre of its ambitions for the country. The NPPF places a strong direction on local planning authorities to significantly boost the supply of housing. The Housing White Paper and its associated legislation and programmes places housing growth at the forefront of the government's priorities.

Housing Need

- 4.3 In preparing the new Local Plan for Medway, the council commissioned a Strategic Housing and Economic Needs Assessment to provide evidence on the housing needed in Medway over the plan period. This was carried out in line with Government requirements to identify the objectively assessed need for housing as a core component of the Local Plan process. Using Government guidance, the assessment analysed demographic, economic and market signal information to determine the quantity and types of housing needs. The technical assessment concluded that the Local Plan needs to provide for 29,463 new homes over the plan period. Since this assessment was carried out the government has published details of its proposed standard method for calculating local housing need. This has been considered in section 3 of this report. Further detail is provided in the Housing Delivery background paper supporting this consultation. The council notes the significantly increased housing needs figure that is generated by use of the government's proposed approach. The council will have regard to the government's response to the consultation, updates to the NPPF, and the publication of 2016 based household projections, to review its evidence base on development needs, before publishing the draft Local Plan.
- 4.4 The Strategic Housing Market Assessment considered the range, type and mix housing needed in Medway. This included the need for 'affordable housing', the size and mix of homes, and those with particular needs, such as older people, people with disabilities, younger person households, minority ethnic groups, and rural

households. The assessment identified a high level of demand for affordable housing at 17,112 over the plan period. The council has identified potential options for development locations to meet the housing needs identified for Medway over the plan period. The scale of projected housing need requires consideration of locations that could accommodate development on a large scale. This is reflected in the potential strategic allocations identified in the development strategy options in this consultation. In particular the proposal for a small rural town on the Hoo Peninsula would provide for a wide range and mix of housing types, that could provide homes suitable for different groups in society. Infrastructure, services, green spaces, shops and employment areas would also be planned as part of new residential areas to provide balanced growth.

- 4.5 The purpose of this Development Strategy consultation is to assess the most sustainable approach to meeting Medway's growth needs. Information gathered through the consultation and technical assessments supporting plan preparation will direct the council to identifying the most appropriate sites and broad locations for growth. Preferred sites will be presented in the draft Local Plan when it is published for further consultation.

Policy H1: Housing Delivery

The council will determine a housing target for the Medway Local Plan, responding to the latest relevant information, in preparing its draft Local Plan.

The council will seek to provide a supply of land to meet the needs for market and affordable housing that responds to the objectively assessed need for housing, and meets the principles of sustainable development.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.

Development of a strategic allocation for a rural town on the Hoo Peninsula will be in accordance with the council's development framework for Hoo.

Question H1:

Does the proposed policy for housing delivery represent a sound approach? Would you suggest an alternative approach?

Housing Mix

- 4.6 The National Planning Policy Framework requires local planning authorities to make provision for a wide choice of high quality homes in mixed, sustainable communities. A key element of this is matching supply of accommodation to need, striking the right balance for a diverse population with changing needs over time. Medway's

communities require a variety of housing, including choice of tenure, to provide appropriate housing options for different households including families with children, couples, single person households and older people. Information has also been assessed for people with disabilities, students, and gypsy, traveller and travelling showpeople.

4.7 Findings of the Housing Need Survey under the Strategic Housing Needs Assessment 2015 revealed that:

- Respondents' properties being too small was the most common reason for those describing their accommodation as not meeting their needs.
- Two thirds of those who wanted to move stated that a two bedroom property was their preferred choice
- Over half of emerging households stated that a two bed property would suit their needs.

The council's Homechoice service records demand for social housing units locally. This confirms a preference for one or two bed properties and that for those looking for larger accommodation; the biggest demand is for one extra bedroom.

4.8 A variety of housing types and sizes, including plots for self-build, will be required to assist in achieving balanced and sustainable communities. However the council recognises that not all sites will be able to accommodate the full range of types needed. The Council will therefore take into account the nature and location of the scheme and, in particular, whether there are any genuine reasons why a mix of types cannot be delivered in practice, or would be harmful to the setting of a heritage asset for example.

Household type and size

4.9 Analysis of the 2014-based household projections indicates that Medway is predicted to see a notable increase in single person and small family households. Single, older male households increase by one quarter, and households with one child will increase by one fifth by 2035. Overall Medway has an above average household size at 2.44 persons compared to 2.36 nationally, however this is predicted to fall to 2.33 in 2035 (2.22 nationally). Changes in household sizes have been taken into account in calculating the scale of housing needed over the plan period. It is noted that Welfare Reform could increase the number of people under 35 years looking to rent a room rather than a self-contained home, due to changes in eligibility for support of housing costs. Wider legislative changes in housing and social policies may also have impacts on the local housing market.

Policy H2: Housing Mix

The council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population.

Residential development will be permitted to encourage a sustainable mix of market housing to include an appropriate range of house types and size to address local requirements.

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.

Accommodation requirements as detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform which house sizes and mix should be delivered in urban and rural areas to meet the objectively assessed needs of the area.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council's housing register and discuss affordable housing requirements with the council's Housing Strategy team at the pre-submission stage of the planning process.

Large development schemes meeting the criteria set out at Policy H9, must demonstrate that sufficient consideration has been given to custom and self-build plots as part of housing mix.

The council will work with partners to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people.

Gypsy, Traveller and Travelling Showpeople accommodation requirements will form part of the borough's need for housing

Question H2:

Does the proposed policy for housing mix represent a sound approach? Would you suggest an alternative approach?

Affordable Housing

4.10 The costs of housing have been rising steadily in recent years, and are now unaffordable for many people. Income levels in Medway are lower than the average in neighbouring areas, and this adds to the difficulties experienced by many residents in accessing housing, either for rent or purchase. In planning for housing to meet the full needs of the local area, the council needs to make appropriate provision in its housing policies. Government policy requires local planning authorities to meet their housing needs in full, both for affordable and market housing.²⁹ This should be delivered on site unless justified otherwise.³⁰

4.11 As noted above, the Strategic Housing and Economic Needs Assessment identified a need for 17,112 affordable dwellings over the plan period. However the Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial

²⁹ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 47, p.12, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

³⁰ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 50, p.13, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

analysis indicates a percentage of 25% affordable housing could be achieved on developments over 15 units. Some areas could support a higher proportion of affordable housing. The assessment indicated an affordability level of 30% for rural areas and 25% for urban areas. Rural areas are much stronger in terms of viability in Medway and so could provide for a higher level of affordable housing. Further work is required to test the viability of the Local Plan and policies, informed by and further policy direction on Starter Homes, and an understanding of the locations, scale and mix of development that will be identified as housing allocations in the new plan.

- 4.12 In preparing the Local Plan, and determining the location and scale of housing allocations, the council will consider and test the delivery of affordable housing, and make appropriate provision in the housing policies to deliver affordable housing that meets the locational requirements (particularly in rural areas), size, type and tenure required by local people, as identified in the SHENA, the council's Housing Strategy or subsequent updates to the evidence base.
- 4.13 The council currently seeks a tenure mix of 60% affordable rent and 40% intermediate affordable housing (of which shared ownership is the preferred option) on development schemes where the number of affordable units to be provided is greater than 10. The council's Housing service has identified a greater demand for affordable rent properties and a review of the split will inform the Affordable Housing policy in the draft Local Plan.

Policy H3: Affordable Housing

On housing and mixed use development sites of 15 or more residential units the council will require the delivery of affordable housing.

The council will apply the following requirements for affordable housing provision:

- in rural Medway 30% of all residential units for developments of 15 or more dwellings
- in urban Medway 25% of all residential units for developments of 15 or more dwellings

Provision must be in accordance with the council's Guide to Developer Contributions and Obligations.

There will be a strong presumption in favour of the affordable homes being fully integrated within the proposed development. However the council may consider off site provision, where this enables other policy objectives to be met, subject to an equivalent level of developer contribution being provided.

Where affordable housing is to be provided offsite, the council's preferred position is for developers to directly providing affordable dwellings on an alternative sit. Only where it can be demonstrated that this can not be provided, would the council consider a financial contribution from the developer which would enable provision through new build on an alternative site.

Question H3:

Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision? What do you consider would represent an effective alternative approach?

Question H4:

What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

Starter Homes

- 4.14 The Government has identified that many people struggle to get access to home ownership and has promoted 'Starter Homes', provided at a 20% discount from market prices, to support access to the housing market for people under 40 years.
- 4.15 However this policy area has not been progressed by government. The council will consider the updated policy or guidance if provided, and make provision as appropriate in its housing policies and allocations in the Local Plan.

Specialist residential accommodation

- 4.16 This considers the need for housing specially designed for sectors of the community, such as older people, people with disabilities, and vulnerable people with specific housing needs, who may, for a variety of reasons, face barriers in finding accommodation to meet their personal needs. This may involve the need for supported housing. This is accommodation which is provided with integral support as a condition of occupancy. The council has identified a number of groups in need of accommodation, who may seek supported housing: young people at risk of, or who are homeless; young people leaving care; people with learning disabilities; those with clinical mental ill-health issues; people with added vulnerabilities who are or become homeless and people experiencing domestic abuse.

Older People

- 4.17 While Medway's population is predicted to increase by a fifth over the next twenty years, growth in the older cohorts of the population is most significant. Growth in the over 65's accounts for just over half of the overall population growth in Medway with an extra 31,000 older residents by 2035.
- 4.18 The 2014-based household projections show a significant increase in single person households in the older age groups, representing more than half the overall increase in single households in Medway. Males aged 65-74 show the most significant increase over the next twenty years. Statistics show that the demand for supported accommodation is likely to rise, as the older population grows and the number of residents with limiting health conditions increases. By 2035, it is predicted that the number of people aged over 65 years experiencing limitations on their daily activities will increase by 59%.

- 4.19 Medway's vision for Adult Social Care is to support the people of Medway to live full, active lives and to live independently for as long as possible. This includes elderly people and disabled people, and planning for people living with dementia. One of the strategic aims of the Medway housing strategy is to 'improve flexibility of accommodation'. The council is working with partners towards solutions to allow the elderly and residents with physical disabilities to live independently in their own homes with adaptations to suit their individual needs.
- 4.20 Official statistics show that there is a significant need for adapted social rent accommodation with around 41% of tenants reporting a need for disability related housing design adaptations. This is higher than the Local Authority average across England at around 30% of tenants (DCLG (CORE) Social Housing letting statistics, 2015/16).
- 4.21 The Government's Lifetime Neighbourhoods Initiative identified the following findings of official research into older person's preferences for accommodation choices:
- 'The majority of people would prefer to remain in their own homes as they grow older, and where possible can make changes and adaptations to their properties should their needs change. Also those people who chose to move to housing schemes especially for older people that offer care and support in their own homes express high levels of satisfaction with their homes'.*
- 4.22 Evidence from the Projecting Older People Population Information (POPPI) website illustrates that an ageing population is likely to lead to an increase in demand for both housing and schemes that offer an element of care. Over the next 17 years the number of over 65's unable to manage at least one self care activity or at least one domestic task on their own is likely to increase by just over 63%.
- 4.23 Traditionally, specialist accommodation for older people has consisted of sheltered accommodation, residential homes and nursing homes. 'Extra Care Housing' provides for a more flexible form of care for older people, which allows for a greater degree of independence and a lower likelihood of need for more intensive forms of support. Research has shown that the incorporation of certain design features in housing can have positive implications for the health and well-being of older people. In 2009, the Housing our Ageing Population: Panel for Innovation (HAPPI) published a report³¹ examining the design of housing for older people and made recommendations to improve it. This guidance includes 10 key design principles, known as the 'HAPPI principles'; and are considered best practice that should be adopted.
- 4.24 The Medway Extra Care Housing Needs Analysis 2011³² concluded that *'there is clear scope to widen the range of housing and support options available to older*

³¹ Homes and Communities Agency, 'Housing our Ageing Population: Panel for Innovation (HAPPI)', Dec 2009, Available at: <https://www.gov.uk/government/publications/housing-our-ageing-population-panel-for-innovation>

³² Institute of Public Care, 'Extra Care Housing Needs Analysis 2011', Available at: <https://www.medway.gov.uk/pdf/Medway%20extra%20care%20needs%20analysis%20-%20July%202011.pdf>

people across tenures with the need for specialist housing services to enable the growing number of older people to live independently’.

- 4.25 The Medway Strategic Housing Needs assessment indicated ‘a need for good quality, smaller units to encourage downsizing’, while the housing needs survey underpinning this suggests that few residents stated a specific ‘need of supported or extra care housing, although this may be a more hidden need’³³.
- 4.26 Remaining within one’s home with adaptations was the most popular option for older people when asked about care needs over the next five years. This was in preference to sheltered accommodation, extra care housing and residential care homes³⁴. However many live in potentially unsuitable accommodation. The findings of the Housing Need Survey under the Strategic Housing Needs Assessment 2015, revealed that the vast majority of households in the sample that contained an older resident had not had any special adaptations (88%) – indicating a possible unmet housing need.

People with disabilities

- 4.27 The 2011 Census identified 43,400 people in Medway who considered that their day to day activities were limited a little or a lot by a disability or limiting long term illness.
- 4.28 Around 10% of Medway’s population aged between 18 and 64 years have a moderate or serious physical disability.
- 4.29 The Projecting Adult Need and Service Information website (PANSI) estimates that in Medway in 2017 there are around 17,300 people aged 18-64 with a moderate or severe physical disability. This number is projected to rise to 18,900 by 2035.
- 4.30 The total number of residents aged 18-64 predicted to have a serious physical disability in Medway in 2015 is 3,900, projected to rise to 4,300 (+9%) in 2035.
- 4.31 PANSI data estimates that there are 4,300 adults (aged 18-64) with learning disabilities in 2017 in Medway, projection data estimates that this number will rise to 4,700 (+9%) in 2015.
- 4.32 Findings of the Housing Needs Survey under the Strategic Housing Market Assessment 2015 showed that:
- Around 20% of respondents were in a household where a family member had a limiting physical disability, of which ninety-three percent had no special adaptations made to their property, indicating a potential unmet need.
 - Varying level of care requirement were reported, however the need for help with physical tasks was the most reported issue.

³³ GVA, North Kent Shena, ‘*Integrated Growth Needs Assessment report*’, SHENA, 2015, Available at: <http://www.medway.gov.uk/PDF/App%20%20-%20Medway%20IGNA%20Technical%20Paper.pdf>

³⁴ Housing Needs Survey, SHENA, 2015

- The proportion of households containing one or more members affected by disability suggests implications for housing needs, particularly in relation to adaptations and improvements / facilitating in-home care.

4.33 Specialist housing should be designed flexibly so that it can be adapted to meet alternative housing needs in response to changes in the future. This type of housing should be provided across Medway, rather than concentrated in a particular area. This will help broaden choice and allow people to retain links with their local area, and maintain balanced communities.

Policy H4: Supported Housing, Nursing Homes and Older Persons Accommodation

The development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:

- Meets a proven need for that particular type of accommodation.
- Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs.
- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.
- Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.

Loss of specialist housing will be permitted only where it is demonstrated that there is no need for the form of accommodation.

Question H5:

Do you agree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?

Question H6:

Do you consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs?

Question H7:

Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme?

Student accommodation

4.34 Medway's student population has continued to grow across the further and higher education sectors, largely clustered in the Learning Quarter at Chatham Maritime.

The council needs to take account of the needs of students as a sector of Medway's communities. Positive planning for students can contribute to Medway's regeneration objectives and boost the vibrancy and vitality of town centres, and secure benefits for the growth of the local economy. However it is important to ensure that the expansion of the sector does not adversely affect established neighbourhoods by an over concentration of students and that existing privately rented accommodation is not 'lost' to tenants with otherwise limited housing options.

- 4.35 In 2014 there were estimated to be around 1,200 bed spaces in institutional accommodation in Medway between University of Greenwich, Canterbury Christchurch, University of Kent and the University of Creative Arts. Since then a further 530 student rooms have been provided at Liberty Quays, with plans for further student accommodation provision in the pipeline.
- 4.36 The highest concentration of students are seen in Gillingham North and River wards, at approximately fifteen percent of the resident population, as these areas are within close proximity to the learning institutions. Unlike some traditional student cities, evidence points to a 'not insignificant' section of students remaining living at home while studying in Medway, some commuting in from London, for example, as well as students at the Canterbury campuses being bused in from Medway, due to accommodation shortages there.
- 4.37 Students represent approximately six percent of the Medway population, however student households represent less than three percent of the private rented stock in Medway, suggesting that purpose built student accommodation may be sufficiently serving the current local student demand. Growth in student numbers does not easily translate into a direct accommodation need for the reasons mentioned above. Evidence shows that private rental sector accommodation in Medway does not meet the housing requirements of students³⁵, however the newly created, purpose built student developments should address these shortcomings.
- 4.38 In developing policy for student housing, the council seeks to ensure a sufficient supply of accommodation to meet needs and support the success of the universities and colleges in Medway. A careful approach is encouraged, striking a balance between proximity of students to their places of study, and avoiding over concentration where this could impact negatively on amenity or access to family housing. Opportunities to increase the supply of student accommodation as part of redevelopment schemes in town centres, particularly Gillingham and Chatham, are welcomed.

Policy H5: Student Accommodation

The council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.

³⁵ Opinion Research Services, 'Understanding the Housing Requirements of Students in Medway', ORS, 2014, Available at: <http://www.medway.gov.uk/pdf/SHMA%20-%20Understanding%20the%20Housing%20Requirements%20of%20Students.pdf>

Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need. The council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, and does not have a negative impact on the core functions of the town centres, and is consistent with strategic redevelopment plans.

These locations must be well served by public transport and accessible to a wide range of town centre, leisure and community uses.

Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land or leisure or community space.

Student housing will be required to provide a high quality living environment and include a range of unit sizes and layouts with and without shared facilities to meet requirements of the educational institutions they serve.

Question H8:

Do you agree with the proposed policy for student accommodation? Would you propose an alternative approach?

Park homes and residential caravan parks

- 4.38 Mobile or park homes make up just under one percent (2011 Census) of the overall housing stock in Medway, which is in line with the Kent level but is around double the national rate.
- 4.39 The majority of occupied caravan/mobile homes in Medway are in the two main residential park home estates in the Hoo Marina Park and the Kingsmead park at Allhallows.
- 4.40 Mobile homes are an attractive housing option for a number of households in Medway. Some cater for specific market sectors, such as people over 50 years. For that reason the council supports the retention of mobile homes in these parks to assist in the supply of a mix of accommodation.
- 4.41 This policy does not consider free standing individual mobile homes or caravans, such as provided for specialist workers in the land based sectors, or where providing a form of temporary accommodation, such as during the construction of a new or replacement dwelling. Further policy will be provided as part of the development management section of the draft Local Plan.

Policy H6: Mobile Home Parks

Proposals for mobile or park home developments will be given the same consideration as other dwellings and will be subject to the same compliance with planning policy in assessing impact and sustainability.

The council seeks to protect existing parks from competing uses, but restrict their expansion outside designated areas. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area particularly those near areas of sensitive environmental interests.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home park, or a reduction in the area available for their use will not be permitted.

The council will set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

Any proposals for updates or intensification must have careful consideration for the colour, massing and materials used, incorporate appropriate landscaping and have no adverse impact on the character of the locality or amenity of nearby residents.

Question H9:

Do you agree with the proposed policy for mobile home parks? Would you propose an alternative approach?

Houseboats

4.42 There are approximately 250 houseboats in Medway and around 400 moorings, many of which are located at sites near Hoo Marina and south of Rochester. Regeneration plans for waterfront development could impact on some sites. However redevelopment plans could lead to improvements to the local environment around the areas where houseboats are located, leading to better access to key services in conjunction with better clustering of houseboats on the River Medway.

4.43 Many of the houseboats in Medway have limited facilities, including for waste disposal and can have negative environmental impacts. In some cases, houseboats are poorly maintained, which can negatively impact on the surrounding amenity. Medway's river and estuary are designated for their environmental importance. Opportunities to upgrade facilities and amenities will be supported where there will be no adverse environmental impacts. Particular regard needs to be given to the health of the designated marine and supporting habitats of the estuaries and river.

Policy H7: Houseboats

The council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim:

- To protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place.

- To specify criteria under which any further growth of houseboats will be allowed in order to minimise impact.
- To seek the removal and disposal of any vessel so moored if a boat sinks, or becomes unfit for habitation, derelict, or is otherwise abandoned.
- To seek opportunities to deliver improvements that benefit the local amenity and environment.

Question H10:

Do you agree with the proposed policy for houseboats? Would you propose an alternative approach?

Houses of multiple occupation

- 4.44 A house in multiple occupation (HMO) is a property that is shared by three or more tenants who are not living together as a family, and who share basic amenities such as a kitchen, bathroom or toilet facilities, but have separate bedrooms. HMOs can provide affordable housing for single people. With increasing demand on the housing market locally, demand for this form of accommodation is likely to increase. Returns on housing statistics³⁶ recorded 300 HMOs in Medway in 2016/17, but other sources indicate levels are likely to be higher. The type and condition of this housing stock varies considerably across Medway, with areas such as Gillingham South having the highest number of shared or converted flats.
- 4.45 Evidence shows that areas with particularly high concentrations of HMO's can potentially lower the standards of amenity experienced by local residents, due to poor management of properties, disturbance and poor provision or use of waste storage facilities. A combination of issues can lead to an area attracting a high proportion of young, single people which may be linked to short-term tenancies and a relatively high turnover of residents. This can conflict with the amenity of more settled residents within the same neighbourhood. Standards of facilities in HMOs can vary and where of poor quality can present unhealthy living conditions for residents. The council recognises the role of HMOs in providing choice in the housing market, but seeks to avoid unacceptable adverse impacts on amenity, or loss of family accommodation through managing the new development of new HMOs.

Policy H8: Houses of multiple occupation

The council seeks to avoid detrimental over concentrations of HMOs. Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where they:

³⁶ Ministry of Housing, Communities & Local Government, 'Local authority housing statistics data returns for 2016 to 2017', Available at: <https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2016-to-2017>

- Do not adversely affect the character and amenity of the area, or the supply of family housing.
- Do not contribute to the over concentration of HMOs in a particular area.
- Do not contribute to the generation of excessive parking demands or traffic in an area.
- Make appropriate provision for the storage of waste

Question H11:

Do you agree with the policy approach for HMOs?

Question H12:

Do you consider that the council should set locational criteria for HMOs, such as consideration neighbouring uses and proximity to other HMOs?

Question H13:

Should the council make use of Article 4 Directions to restrict the ability to convert properties to HMOs?

Self Build and Custom Housebuilding

- 4.46 National planning policy³⁷ advises that authorities should include people wishing to build their own homes when planning for the needs of different groups in the community.
- 4.47 The Government has also provided additional policy and guidance to support the demand from the self and custom house building market, which advises *‘in considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout’*.
- 4.48 Self-build is generally where the owner is directly involved with/manages the design and construction of their new home, whereas custom housebuilding means the owner commissions the construction of their home from a developer/builder/contractor/package company who builds the property to the owner’s specifications. With custom build the occupants do not usually carry out any of the physical construction work but still make key design decisions.
- 4.49 Medway’s vision for 2035 includes an aspiration that new development in its towns and villages will have responded positively to the character of the surrounding environment and needs of existing communities. To support this vision, one of the objectives of the Local Plan is that Medway will be recognised for its quality of life, by

³⁷ Department for Communities and Local Government, *‘National Planning Policy Framework’*, paragraph 50, p.13, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

providing for the housing needs of Medway's communities that meets the range of size, type and affordability the area needs.

- 4.50 The need for plots of land on which people can build their own home has been identified through the Self Build and Custom Housebuilding Register, which relevant planning bodies have been required to have under legislation³⁸ from 1st April 2016.
- 4.51 Medway Council's Self Build and Custom Housebuilding register is publicised on the website³⁹ and operates in 'base years', which run from 31 October to 30 October the following year.
- 4.52 By the end of Base Period 2 (31st October 2016 – 30th October 2017) the council had received 39 applications, although 12 of these applicants indicated that they had also applied to be listed on the registers of other local authorities. Applicants are interested in acquiring plots across the Medway area for building their own house or bungalow, with plot sizes ranging from 0.01ha to 0.2ha and above. As at the end of Base Period 2 there has been no interest from associations (groups of individuals looking for a plot big enough on which they can each build their own home).
- 4.53 Chapter 2 of The Housing and Planning Act 2016 requires relevant authorities to give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. If the demand identified in the register is projected at the same rate to 2035, there will potentially be a requirement for around 600 self build/custom housebuilding plots to be granted permission in the plan period.
- 4.54 This policy encourages landowners and developers to offer plots to self and custom builders, enabling people to have the opportunity to build their own high quality homes, on both larger sites and smaller developments, which can also boost and support the local economy by providing opportunities for local tradespeople and small and medium sized builders.
- 4.55 This policy maintains one of Medway's strategic objectives of establishing quality design in all new development, respecting the character of the local environment and seeking opportunities to boost quality and improve the accessibility and design of the public realm.

Policy H9: Self-build and Custom Housebuilding

The council will support self-build or custom build home development in sustainable and suitable locations.

To identify and provide for people who wish to build their own home, the council will maintain a register of interested parties and report the headline data annually on the council website after the end of each base period.

All new self-build/custom housebuilding applications

³⁸ Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016)

³⁹ Medway Council, 'Self-build and Custom Housebuilding Register', Available at:

<http://www.medway.gov.uk/planningandbuilding/planningpolicy/self-buildcustomhousebuild.aspx>

- Applicants will need to have regard to the local landscape and guidance from other relevant Local Plan policies in the same way that other types of residential applications do; this will ensure all types of new development are of high quality.
- If the number of self build plots on a single site exceeds 10, then a design code framework should be agreed with the council prior to the submission of individual planning applications. This will ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality.
- In accordance with Government guidance on Self-Build and Custom Housebuilding, the plots must be serviced (have access to a public highway and connections for electricity, water and waste water) or, in the opinion of a relevant authority, can be provided with access to those things within the duration of a development permission granted in relation to that land.
- Where a land owner has a suitable small site that they wish to obtain speculative outline residential permission for, they are encouraged to consider the plot for self-build or custom housebuilding, depending on the local demand.

Expanding/intensifying existing residential permissions

Where there is an existing residential permission and the developer approaches the council seeking to expand/intensify the development, the developer should demonstrate that they have considered some/all of the additional plots to be provided as serviced self/custom build plots, where there is identified demand.

Neighbourhood Plans

The council supports the consideration of self-build and custom housebuilding in the preparation of Neighbourhood Plans, and joint working with Neighbourhood Plan groups to establish a locally derived design code.

Council owned land and Regeneration

The council will consider opportunities for self-build housing in disposal of Council land and in promoting regeneration schemes.

Question H14:

Do you agree with the self build and custom housebuilding approaches taken above?

Self Build Site Allocations

In considering site suitability, some sites have been identified from the Strategic Land Availability Assessment (SLAA) as having potential for self build and/or custom

housebuilding use. Some of the larger sites may have potential for a proportion of the area to be suitable for self/custom build. The Council may seek to secure planning permission on any sites allocated for self/custom build by way of Local Development Orders after the Local Plan is adopted.

Question H15:

Do you think that the council should allocate specific sites for self/custom housebuilding development? If so, do you have any sites suitable for this use that you wish to promote for us to consider?

If we do allocate self/custom build sites, we will advertise them on our website. The land owner would also be expected to market the site. When allocating a site/part of a site for self/custom build, it is important that there is realistic expectation of interest in the site. However, due to circumstances out of the control of the council and land owner, the site may not receive the interest that had been anticipated. We therefore propose that once an allocated site has sold and built out a certain proportion of the self build plots, if the land owner is unable to sell the remaining plots after marketing them for a further period of time (to the satisfaction of the council), they will then be allowed to firstly offer the plot(s) to the council/housing association, before being allowed to build out on the plot themselves or sell to a non self/custom builder/developer.

Question H16:

Do you agree with the approach set above?

If yes, what proportion of the allocated site do you agree is an acceptable percentage to be sold and built out before the remaining plots could be offered to the council/housing association or other non self/custom builders?

After what further period of time of unsuccessful marketing do you feel it would be acceptable to offer the remaining plots on to the council/housing association or other non self/custom builders?

Sites over 400 dwellings

In order to satisfy the demand from the register, we propose that applications on sites over a certain number of dwellings should make available at least 5% of the plots to self/custom builders for purchase. We suggest a threshold of 400 dwellings and over. The developer will need to provide robust evidence to demonstrate if this is not economically viable. This would apply to applications on new Local Plan housing allocations or windfall sites.

Question H17:

Do you agree that sites over a certain size should offer a percentage of the plots to self/custom builders?

If yes, do you agree with the proposed 5% share of plots for self/custom build and the threshold of sites at 400 dwellings and over?

Question H18:

Following on from the question above, if a plot has been marketed (to the satisfaction of the council) for 12 months and not sold, we propose that it can then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market.

Do you agree with this approach outlined above?

Question H19:

With regards to these large sites of 400 dwellings or over, in order to prevent the completion of the overall site from being drawn out, exposing existing residents to extended periods of construction by their neighbours, we propose that if a plot is purchased by a self or custom builder, the dwelling must be built within 3 years of the date of sale, before being offered to other applicants on the self build register to purchase. If there is no interest, then it may then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. The onus would be on the developer to advise the council when each plot had been sold in order to monitor the development.

Do you agree with this approach outlined above?

Gypsy and Traveller Accommodation

4.56 Government policy⁴⁰ requires local authorities to make provision for the specialist accommodation needs of gypsy and traveller communities and travelling showpeople^{41,42}. Local planning authorities are required to assess the accommodation needs of the gypsy, traveller and travelling show person population in their area and to set pitch targets for gypsy and travellers and plot targets for travelling showpersons and demonstrate deliverable sites in the short and long-term.⁴³ In the Planning Policy for Traveller Sites, published in 2015, Government introduced a revised definition of gypsies, travellers and travelling showpeople and set out its approach to decision making and plan making in relation to traveller sites. The overarching aim of the national policy is to 'ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.'

⁴⁰ Housing Act 2004, Ch 34

⁴¹ Department for Communities and Local Government, '*National Planning Policy Framework*', 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁴² Department for Communities and Local Government, '*Planning Policy for Traveller Sites*', August 2011, Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

⁴³ *ibid* 41

4.57 National policy defines gypsies and travellers as:

*'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.'*⁴⁴

4.58 The definition of travelling showpeople is:

*'Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers'*⁴⁵

4.59 There are presently 16 gypsy and traveller sites and 1 travelling showperson site in Medway. These include one public site at Cuxton, managed by Medway Council, and a range of permanent and temporary private sites. The council has commissioned a Gypsy and Traveller accommodation assessment to provide an updated evidence base for the new Local Plan.

Policy H10: Gypsy, Traveller and Travelling Showpersons

Safeguarding Existing Sites

Existing permanent authorised gypsy and traveller sites and sites for travelling showpeople will be retained, unless:

- There is a surplus of available accommodation over and above the required five year supply of sites, or,
- The site will be replaced by a site of similar proportions in an appropriate location which complies with the criteria listed below for new sites, or,
- A site has been granted a personalised permission restricting residency to a named occupier or family.

New Sites

Proposals for new gypsy, traveller and travelling showperson sites (temporary or permanent) will be permitted, in accordance with the council's planning policies if they meet the following criteria:

- Need – the council is satisfied that there is a clear need for the site and the proposal cannot be met on existing available sites or an allocated site
- Location – within an accessible walking distance to local facilities for education, healthcare, and convenience retailing.
- Not located in the Green Belt, flood risk zones 2 & 3, areas covered by landscape or environmental designations (AONBs, SSSI, Ramsar, SPA, SACs, Ancient Woodland or

⁴⁴ *ibid* 41

⁴⁵ *ibid* 41

local nature reserves), protected open spaces or protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas), or the best and most versatile agricultural land, of Grades 1, 2 or 3a).

- Scale – a site should respect its location and surrounding environment and be embedded within it and not intrude onto the landscape. The council will require a landscape strategy as part of the application to confirm the details of this.
- Pitches and plots should be of a sufficient size and, on sites for Travelling Showpeople have space for adequate storage.
- Access – there is safe and convenient pedestrian and vehicular access to the public highway, with adequate space on site for vehicle turning and parking

Question H20:

Does this represent a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs?

Question H21:

Do you consider that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan?