



JUNE 2026

Housing Land Supply Review: Gravesham BC

Draft Report

Iceni Projects Limited for
Ptarmigan Land

June 2026

ICENI PROJECTS LIMITED
FOR PTARMIGAN LAND

Iceni Projects

Birmingham: The Colmore Building, 20 Colmore Circus Queensway, Birmingham B4 6AT

Edinburgh: 14-18 Hill Street, Edinburgh, EH2 3JZ

Glasgow: 201 West George Street, Glasgow, G2 2LW

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

Manchester: WeWork, Dalton Place, 29 John Dalton Street, Manchester, M26FW

t: 020 3640 8508 | w: iceniprojects.com | e: mail@iceniprojects.com

linkedin: linkedin.com/company/iceni-projects | twitter: [@iceniprojects](https://twitter.com/iceniprojects)

Review:

Supply

Land

Housing
Gravesham BC
DRAFT REPORT

1. INTRODUCTION

- 1.1 Icen Projects has prepared this report to assess the housing land supply position in Gravesham Borough in Kent. The report has been prepared in May and June 2026. It considers whether Gravesham BC can demonstrate a five year housing land supply position, together with the appropriate supply-side buffer, as NPPF Para 78 requires.
- 1.2 Gravesham Borough Council have not published an up-to date HLS statement as NPPF Para 78 requires. Therefore, in order to assess the current HLS position we have considered the last published statement and updated this taking account of data on planning permissions using information from plantech software Landstack. We have then considered draft allocations in the Regulation 19 Plan consultation and the deliverability of these, although noting that given the stage of progression of the Plan, as per NPPF Para 49, these carry very limited weight.
- 1.3 A recent appeal decision in Gravesham from December 2025, which related to a scheme in Istead Rise, sets out that a five year supply cannot be demonstrated. The main parties in the appeal – the Council and Appellant - agreed that the current supply 'is some 3 years' (Para 30).
- 1.4 This report provides an updated assessment considering the latest position. It demonstrates that Gravesham cannot demonstrate a five year housing land supply; and in any case the 'presumption in favour of sustainable development' is engaged as the Housing Delivery Test (HDT) result of 59% (2023 measurement) falls below the 75% threshold set in NPPF Fn8 and Para 79c.

2. HOUSING LAND SUPPLY POSITION

- 2.1 We assess herein the housing land supply (HLS) position in Gravesham. NPPF Para 78 requires all LPAs to identify and update annually a supply of specific deliverable sites to provide a minimum of five years' worth of housing against their housing requirement (or standard method where strategic policies are more than 5 years old). The HLS position is a function of the housing requirement and the deliverable supply.
- 2.2 Councils are required to maintain a five year housing land supply. Where this is lacking, the presumption in favour of sustainable development applies (applying NPPF Para 11d and Fn8). The intention of national policy in this respect is to release additional residential land to boost housing delivery. The extent of any housing delivery shortfall is relevant to the weight to be given to the benefits of housing delivery in determining planning applications.¹
- 2.3 In the remainder of this section we set out our assessment of the housing land supply position in Gravesham at the current time.

The Council's Latest Assessment

- 2.4 The Council's latest Five Year Housing Land Supply Statement is dated Feb 2025. This however is a 2024-29 Statement which was updated in Feb 2025 to reflect the revised standard method introduced in the December 2024 NPPF. The supply assessment was undertaken in 2024.
- 2.5 That assessment recognised that the Core Strategy was adopted in 2014 and that the housing requirement within it is out-of-date. It assessed the housing land supply against the standard method local housing need (LHN); with a 20% buffer added to reflect significant under-delivery of housing in the Borough.
- 2.6 The Council's assessment within this Statement was of a deliverable supply of 2,429 dwellings over the 2024-29 period. This equated to a 3 years' supply position.
- 2.7 The Council's latest assessment therefore demonstrated that it was not able to demonstrate a five year housing land supply.
- 2.8 This assessment is now based on data which is two years old and cannot be considered up-to-date. However there is no evidence provided by the LPA which demonstrates that the supply position in

¹ Hallam Land v. SSCLG & Eastleigh BC [2018] EWCA Civ 1808

Gravesham has materially improved. We assess the supply position based on the latest evidence in this report.

Base Date

- 2.9 1st April 2026 is the base date of the assessment as the assessment has been undertaken during the 2026/27 monitoring year. The five year period considered thus runs from 1st April 2026 to 31st March 2032.

Housing Requirement

Base Requirement

- 2.10 As the 2014 Core Strategy housing requirement is more than five years old, applying NPPF Para 78, the housing land supply should be assessed against Gravesham's local housing need (LHN).
- 2.11 The housing need is calculated using the standard method as set out in the Planning Practice Guidance (PPG). Table 2.1 below calculates the LHN using data on the 2025 housing stock from MHCLG Live Table 235; and median house price to workplace-earnings data for the Borough over the 2020-25 period. The calculation shows a LHN for 687 homes per annum, which translates into a base requirement for 3,435 homes over the next 5 years.

Table 2.1 Standard Method Local Housing Need – Gravesham

Year	Gravesham
Total housing stock, 2025	45,750
Baseline starting point at 0.8% pa stock growth	366
Average affordability ratio, 2021-25	9.61
Affordability uplift	188%
Local housing need	687

Buffer and Overall Requirement

- 2.12 Having regard to the 2023 HDT score of 59% and NPPF Para 79b, a 20% buffer is applicable as the HDT score falls below 85%. As the chart below demonstrates, Gravesham has consistently fallen well short of meeting housing need, as set out below.

Table 2.2 HDT Results for Gravesham over time

Year	HDT result
2018	64%
2019	75%
2020	70%
2021	57%
2022	53%
2023	59%

- 2.13 The overall requirement for the 5 year period is calculated by taking the base five year requirement of 3,435 dwellings, and then applying a 20% buffer to this. This generates a total housing requirement over the 5 year period (2026-31) of 4,122 dwellings, equivalent to an average of 824 dpa.

Table 1.1 Housing Requirement Calculation

	Dwellings – Gravesham
Base 5 year requirement, 2026-31	3,435
20% Buffer	687
Total requirement	4,122
Per Annum	824

Assessing the Deliverable Supply

Guidance and Approach

- 2.14 The definition of deliverable sites is set out in the NPPF Glossary as follows:

Deliverable: 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. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

- 2.15 Sites with planning permission which do not involve major development (such as those of less than 10 dwellings) and larger schemes which have detailed planning permission (full or reserved matters), which fall under Part a) of the definition, are to be considered deliverable unless there is clear evidence that homes will not be delivered in the five year period. Such sites are to be considered deliverable in principle.² In contrast, sites with outline permission, extant allocations and those on brownfield registers, and those with a permission in principle which fall under Part b) of the definition, should be considered deliverable only where there is **clear evidence** that housing completions will begin on site within 5 years.
- 2.16 The correct starting point for sites falling under Part b) of the definition is to consider the **quality of the evidence**. Inspector Felgate in an appeal decision related to *Land off Popes Lane, Sturry, Kent* (CD6.5) outlines that *“it is clear from the NPPF and PPG that, until sites achieve detailed planning permission, they should not be treated as deliverable, unless the evidence clearly demonstrates that this status is justified”* (Para 22).
- 2.17 Inspector Stephens in an appeal relating to Land on East Side of Green Road, Woolpit, Suffolk³ found that the Glossary definition of deliverable in the NPPF 2018 goes further than its predecessor and *“the onus is on the LPA to provide that clear evidence for outline planning permissions and allocated sites”* (Para 65). He went on to outline that the updated PPG sets out guidance on what constitutes ‘deliverable sites’ (which we consider further below) and *“places great weight on the adequacy and sufficiency of consultation with those responsible for delivering dwellings”* (Para 69).

² PPG ID: 68-007-20190722

³ Appeal APP/W3520/W/18/3194926

2.18 Planning Practice Guidance provides guidance on the quality of evidence expected. Para 68-007⁴ outlines that in order to demonstrate a 5 years' worth of deliverable housing supply, **robust, up-to-date evidence needs** to be available. It outlines that the evidence required to demonstrate the deliverability (for sites which are not considered deliverable in principle) may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

2.19 PPG Para 68-007 also cross refers to the Housing and Economic Land Availability PPG. This refers to the types of evidence necessary to demonstrate deliverability. Iceni would make the following points regarding the tests of deliverability having regard to the PPG:

- Suitability – Iceni consider that for five year land supply purposes suitability should be assessed against policies in the adopted development plan.
- Availability – the PPG outlines that there should be confidence that there are no legal or ownership impediments to development, for example land controlled by a developer or landowner who has expressed an intention to develop may be considered available. Regard should be had to the delivery record of developers or landowners putting forward sites (PPG 3-019).
- Achievability – the test is one of whether the evidence supports a *reasonable prospect* of the site being developed at a particular point in time, having regard to economic viability and the capacity of a developer to let/sell properties (PPG 3-020)
- Timescales and Rate of Development – information on suitability, availability and achievability can be used to assess the timescale within which each site is capable of development. This

⁴ ID: 68-007-20190722

may include indicative lead-in times and build-out rates for the development of different scales of site. The advice of developers or local agents will be important in assessing [this] (PPG 3-022).

- 2.20 The assessment of five year land supply should be used on the deliverability of sites at the base date. This is the approach that Icení have used. It is not therefore appropriate to include sites which would not have been considered deliverable at the base date – such as sites which have been granted planning consent since the base date – without equally subtracting completions which have occurred since the base date. Icení's position on this is consistent with the findings of a range of planning inspectors at appeal.
- 2.21 In an appeal decision related to Land East of Newport Road, Woburn Sands⁵ the Secretary of State agreed with his Inspector that *"it was acceptable that the evidence can post-date the base date provided that it is used to support sites identified as deliverable [at the base date]"* (See DL Para 12 and IR Para 12.11). This is the approach which we have applied herein.
- 2.22 Icení has assessed the deliverability of sites on this basis, applying the NPPF definition and associated guidance within the PPG. It is not clear on what basis the Council has assessed site deliverability and whether the evidence justifies sites as 'deliverable.' No method statement or individual site commentary for Part b) sites, as is required, is provided in the Council's latest (2024) assessment.

Major Site Commitments

- 2.23 Based on our review of major sites commitments, we consider that the following sites are not deliverable:
- **Ebbfleet Central (EDC/22/0168):** Whilst outline consent has been approved, no reserved matters applications for residential have been submitted to date and in particular the phasing envisages the early phases of development in Dartford.
 - **Northfleet Harbourside (20221064):** This is a complex scheme with evident viability issues. A decision on the outline application from the Secretary of State is still pending; with commercial relocation, site assembly and RM applications required. There is no clear evidence that units will be delivered in the 5 year period.

⁵ APP/Y0435/W/17/3169314

- **The Charter – Market Square / Horn Yard, Gravesend (20200343):** This site is a previous local plan allocation and received planning consent in January 2021. All 242 homes will be built out over before the current 5 year period.
- **Clifton Slipways, West Street, Gravesend (20191122):** Planning consent was granted in December 2020 for 227 dwellings. Evidence shows that the scheme is not viable and therefore is not deliverable.
- **Former Lord Street Car Park, Gravesend Abbey (20211540):** the extent consent granted at in November 2023 for 156 flats. No progress with discharge of conditions and the permission is due to expire November 2026. The scheme is not viable, with no evident progress in securing funding or progressing construction. Not deliverable.
- **Former Gravesend & North Kent Hospital (M Block), Gravesend (20220915):** The site received planning consent on 17/02/22 for 115 residential units. However the evidence indicates that the permission has not been implemented and has lapsed. LDC certificate refused.
- **Bowling Green, Church Walk (20221328):** Extant consent granted in January 2024, however lack of subsequent progress indicates the site is not viable. The 62-apartment retirement complex is likely to be delivered beyond 5 years.
- **BRT Properties, Vale Road, Northfleet (20211582):** Application was permitted at appeal in July 2023 for 14 flats. No progress with discharge of conditions and the permission is due to expire in July 2026. Evidence indicated development not viable and therefore not deliverable.
- **Rear of Bridge Bar, Stone Street, Gravesend (20211195/20191187):** Extant consent granted in January 2024, however lack of subsequent progress indicates the site is not viable.
- **Units 9 & 10 May Avenue (20171120):** Permission granted in February 2022 for 14 flats. No evidence of discharge of conditions and the evidence indicates permission has lapsed.
- **Former Gravesend & North Kent Hospital (M Block), Gravesend (20220915):** Permission granted in Feb 2022 for 115 units. The Council has refused LDC application 20250301 and considers that the scheme was not lawfully implemented before the consent expired.

Local Plan Proposed Allocations

- 2.24 In respect of Local Plan proposed allocations, Icenl has reviewed the deliverability of these sites. Where sites do not have detailed consent there is a requirement for the Council to provide clear evidence in support of deliverability.
- 2.25 The standard of evidence provided in the Council's SHLAA is weak, with no commentary on developer interest, site assessment work undertaken, viability, infrastructure provision or progress

with planning applications. It does not meet the standard's expected of new PINS Guidance on housing land supply evidence.⁶ Iceni has had regard to this in assessing housing land supply.

2.26 The only sites for which there is any evident progress in bringing forward development, which are not included as commitments, are set out below. We comment on the deliverability of these as follows.

- **Albion Waterside (20210270):** Planning consent still has yet to be granted on this 2021 application. The site has a history of non-delivery and there are evident viability challenges with a lack of clear evidence supporting the likelihood of completions within the 5 year period.
- **Buckland Farm (20250889):** An outline application has been submitted for 40 homes. We consider this is deliverable within the 5 year period having regard to current progress and scheme size.
- **North of High View, Highnam (20260223):** An outline application for 50 homes has been submitted by M Scott Properties. This is considered deliverable and is expected to contribute 20 dwellings to the 5 year supply.
- **Rose Farm, Istead (20251233):** An outline application for 150 dwellings has been submitted by Esquire Developments. This is considered deliverable and is expected to contribute 15 dwellings to the 5 year supply.
- **West of Norwood Lane, Hook Green, Meopham (20251116):** An outline application has been submitted for 150 homes by Taylor Wimpey. This is considered deliverable and is expected to contribute 15 dwellings to the 5 year supply.

2.27 For other local plan proposed allocations, the Council has not identified clear evidence that they meet the definition of deliverable having regard to the NPPF and PPG. Our analysis has found no clear evidence supporting their deliverability.

2.28 At the current time, the allocations are not confirmed and many are likely to be subject to outstanding objections. Having regard to NPPF Para 49, the draft allocations for sites in the emerging Plan can be afforded only very limited weight.

Windfalls

2.29 The NPPF, in Para 75, sets out that there must be compelling evidence to justify inclusion of a windfall allowance. It states that It goes on to state that *“any allowance should be realistic, having regard to the strategic housing land availability assessment, historic windfall delivery rates and*

⁶ [Local plans: housing land supply evidence - GOV.UK](https://www.gov.uk/government/publications/local-plans-housing-land-supply-evidence)

expected future trends". Iceni has had regard to the Council's 2026 SHLAA which considers that a windfall allowance for large sites is not justified; but for small sites (less than 10 dwellings) is reasonable and calculates this based on trends over the 2014-25 period.

- 2.30 However as shown in Table 2.4 below, the number of completions dropped considerably after 2017; with higher windfall in the 2014-17 period than since. There is potential for elevated windfall rates in 2014-17 to have been influenced by the introduction of PD rights in 2014.
- 2.31 The Council calculates a windfall rate of 70 dpa considering the 11 year period as a whole. However since 2017, this rate has only been exceeded once (in 2021/22). We do not consider that this is supported by the evidence.
- 2.32 Over the 7 year period since (2017-25) the average windfall rate has been 57 dpa. Over the last 5 year period the rate is similar at 56 dpa. We consider that the 56 dpa figure is suitable and should be used to calculate a windfall allowance.
- 2.33 Iceni has not assessed small site commitments as we do not have access to the detailed monitoring data to do so. We therefore apply the windfall rate across the 5 year period. We have then included a windfall allowance of 282 dwellings in the 5 year period (56 x 5).

Table 1.4 Total Completions Small site windfalls (under 10 dwellings)

	Completions Small Site Windfall
2014/15	114
2015/16	108
2016/17	102
2017/18	56
2018/19	60
2019/20	54
2020/21	64
2021/22	73
2022/23	56
2023/24	54
2024/25	35
Average number of dwellings over the most recent 5 years	56

Total Deliverable Supply

- 2.34 Drawing the above together, our assessment indicates an estimated deliverable supply of 1,431 dwellings. This is made up as follows:

Table 2.2 Deliverable Supply

	Deliverable Supply
Deliverable Supply: Large Sites	1,151
Supply from Small Sites (Windfall)	280
Total	1,431

Housing Land Supply Position

- 2.35 Bringing together the requirement and the deliverable supply, Iceni calculate **a deliverable supply of 1.2 years** at the current time. Our evidence points to **a very substantial housing supply shortfall over the five year period of 2,691 homes.**

Table 2.3 Current Housing Land Supply Position

	Dwellings
Total requirement	4122
Per Annum	824
Deliverable Supply, 2026-31	1,431
Years' supply	1.7
Shortfall	-2,691

- 2.36 There is a very substantial housing land supply shortfall which is evident. It is clear that the HLS position has deteriorated since the Council last considered the housing land supply position.
- 2.37 Furthermore, the weak delivery short-term is expected to result in particular challenges in demonstrating that there is a five year housing land supply at adoption. Our analysis shows that weak delivery short-term is expected to contribute to a shortfall in delivery prior to the plan's adoption and result in a supply position worsening to a forecast 1.1 years at adoption based on the current data.
- 2.38 To have a five year land supply at adoption of the local plan, as the NPPF requires, the evidence clearly indicates that the Council needs to grant additional residential consents in the short-term.