

Home Builders Federation

Matter 2

MAIDSTONE LOCAL PLAN EXAMINATION

Matter 2 – The Borough Spatial Strategy

Issue 1: Whether the Local Plan Review has been positively prepared and whether it is justified, effective and consistent with national policy in relation to housing need and the housing requirement.

Q2.1 Has the calculation of Local Housing Need (1,157 homes per annum) been undertaken appropriately using the standard method and correct inputs?

The Council have used the standard method as required by national policy and at the time of writing the SHMA update used the correct inputs. However, prior to submission the updated Housing Affordability data were published by ONS. This latest evidence shows that the median affordability ratio for 2021 had increased in Maidstone from 1.38 to 1.43. Using the base period 2022 to 2032 would see the local housing needs using the standard method increase from 1,157 to 1,194 dpa and a total housing need for the plan period of 17,910.

Whilst the latest data on affordability was published on the 23rd of March and the Maidstone Local Plan was submitted on the 31st of March Planning Practice Guidance does state in paragraph 2a-004 that the most recent median workplace-based affordability ratios should be used. It should also be noted that paragraph 2a-009 sets out when these ratios are updated so the Council should have been aware of the potential for change in the run up to submission and should have taken the updated data into account.

Therefore, in order to be consistent with national policy and its supporting guidance the housing requirement should be increased to 1,194 dpa. As such there would be a shortfall over the plan period, based on the Council's submitted housing trajectory (LPR 1.8) of over 600 homes.

Q2.2 Should the housing need figure be higher than the minimum Local Housing Need of 1,157 homes per annum? Do any of the circumstances set out in paragraph 10 of the housing and economic needs assessment chapter of the PPG (or any relevant circumstances) apply in the Borough of Maidstone?

Paragraph 2a-010 of PPG notes that one such circumstance is where an authority agrees to take on the unmet needs of another authority. Whilst this is framed in terms of a positive action it clearly aligns with paragraphs 11 and 61 of the NPPF which requires Council's to take account of any unmet needs in neighbouring areas when establishing the amount of housing to be planned for. As we set out in our

representations and in our hearing statements to matter 1 of this examination there will significant shortfalls in housing delivery across London that will directly impact on housing needs in Maidstone, and which must be taken into account.

Q2.3 Does the Council's ambitious approach of allocating more employment land than the labour demand scenario projections indicate, justify an increase in the housing need figure? Will 1,157 homes per annum provide the working age population sufficient to support the number of additional jobs likely to be created over the plan period?

No comment

Q2.4 Should the Plan set housing requirements for designated neighbourhood areas in light of paragraph 66 of the NPPF?

No comment

Q2.5 The plan period is expressed as 2022-2037. NPPF paragraph 22 states that strategic policies should look ahead over a minimum 15-year period from plan adoption. What would be the consequences of amending the submitted plan period to 31 March 2038 or alternatively to 31 March 2039?

Extending the plan period by a single year would see the total housing requirement for the plan increase from 17,355 homes to 18,512 homes, based on an annual need of 1,157 homes. However, as we have set out above when the most recent data on affordability is used this increases the housing needs assessment to 1,194 dpa which would be a minimum requirement for the plan period 2022-2038 of 19,104. As noted by the Council in paragraph 7.3 of ED31 that the Council would need to identify additional capacity to ensure needs are met in full.

Q2.6 Is it justified that the plan period starts on 1 April 2022? Is the base date supported by the evidence base, including robust baseline figures on extant supply of housing land and employment land to meet identified needs as of 1 April 2022? What would be the consequences of amending the plan period to start on 1 April 2021?

No comment.

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