

## Home Builders Federation

### Matter 8

## MAIDSTONE LOCAL PLAN EXAMINATION

### Matter 8 Housing Delivery

#### *Issue 2: Delivering an appropriate mix of housing including affordable homes.*

Q8.13 In combination, do Policies SP10(A) and HOU 9 provide a justified and effective approach to delivering self-build and custom-build housing in response to known and anticipated levels of demand in the Borough?

The approach seeks to support the delivery of self and custom build housing by working with land owners to identify where it is appropriate to deliver such plots. Such an approach is consistent PPG which, at paragraph 57-025, states that Councils should encourage land owners and developers to consider self-build and custom house building and facilitating access to plots to those on the self-build register. However, if it is considered necessary to secure additional self-build plots, we would suggest that the most effective way forward would be through the allocation of additional sites in suitable locations that would meet the expectations of those looking to build their own home or through the adoption of a small sites policy that would support the delivery of sites that would be suitable for self-build and custom housebuilding.

Q8.14 Is the 24 month marketing period in Policy LPRHOU9 justified?

This is a very long period for marketing of any plots. If there is demand for plots and these can be marketed directly at those on the self-build register than the marketing period should not really need to be any more than six months and 12 months at the most.

Q8.15 Is the approach to affordable housing delivery in Policy SP10(B) justified, including the proposed levels of provision in Part 1 of the policy relative to the identified value zones and underpinning plan-wide viability assessment [LPR5.1]?

A variable rate is justified given that the evidence indicates significant differences in the ability of sites in different areas to provide affordable housing. However, as noted in our statements there are a number of areas where the Viability Assessment has not



considered the full costs implications, in particular in relation to Biodiversity Net Gain. This could have an impact on the level of affordable housing that can be delivered, and the Council should have considered the impacts of that requirement on affordable housing delivery and ultimately its decision to require development to deliver a 20% Biodiversity Net Gain.

Q8.16 Will Policy SP10(B) be effective in securing affordable housing in the low value area and on brownfield sites where opportunities exist? What role will the Affordable and Local Housing Needs Supplementary Planning Document play in this regard? Will the policy approach potentially embroil some sites in protracted viability appraisals and would the proposed modification to SP10(B) in LPRSUB011 assist on this matter? Is there the evidence to support a lower but viable proportion of affordable housing provision on qualifying sites in the low value areas?

The wording of the policy lacks sufficient clarity and could cause confusion for both applicants and decision makers. The evidence indicates that at the current level of affordable housing on brownfield land in low value areas will struggle to deliver any affordable housing. In this situation the Council should be clear in stating that such sites will not be expected to deliver any affordable housing. However, the Council have caveated this position to allow them scope to require provision where they consider it to be appropriate. This will just delay sites coming forward due to uncertainty and will inevitably lead to protracted negotiations over levels of delivery that are unlikely to yield significant numbers of affordable homes. As set out in our representations the Council should remove these caveats from the policy in order to provide a positive approach to delivering brownfields sites in its lower value areas.

Q8.17 Are the tenure targets in part 3 of Policy SP10(B) justified, viable and sufficiently clear in respect of any intermediate provision? Does the Plan appropriately reflect Planning Practice Guidance on First Homes?

No comment

Q8.18 Does Policy HOU.1 strike an appropriate and effective balance between facilitating housing development on previously developed land in smaller villages and the countryside and protecting the intrinsic character and beauty of the countryside, the great weight to be given to conserving and enhancing the landscape and scenic beauty of AONBs and the need to secure a sustainable pattern of development over the plan period?

No comment

Q8.19 In combination would Policies HOU1, HOU3 and HOU4 provide a positive framework for enabling housing delivery on small sites in the Borough? Is it necessary for soundness to have a specific 'small sites' policy given the evidence in ED66 demonstrates that at least 10% of the housing requirement would be met on sites no larger than 1 hectare?

The Council are expecting a significant number of homes to come forward on both small and large windfall sites - around 2,700 homes which is 15% of total supply. As such the plan is reliant on this uncertain source of new homes to ensure that housing needs are met each year and over the plan period. It is therefore imperative that the Local Plan includes policies that will support the level of windfall delivery that is expected over the plan period. One such mechanism would be a specific small sites policy that would allow more small sites to come forward over the plan period and provide a more positive policy environment to support the windfall expectations proposed by the Council.

Q8.20 Is the proposed approach in Policy LPRHOU7 to specialist residential accommodation, and in particular the need for housing for older people, justified and effective? Has a similar policy framework in the 2017 Local Plan attracted specialist accommodation proposals at the edge of sustainable settlements?

Whilst the HBF didn't comment on this policy in our representations in general we consider it important for sites to be allocated to meet the needs of older people. In addition, we would suggest that the Council include within the policy what is required to meet the needs of older people in order to give weight to decision making in support of such development if there are shortfalls in the delivery of such homes.

Q8.21 Is the proposed approach in Policy LPRHOU10 for Build To Rent proposals justified (having regard to latest SHMA evidence), effective and reflective of guidance at the associated section of the Planning Practice Guidance? Is it justified to set out the requirements for affordable housing on Build To Rent schemes in a separate SPD?

No comment.

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