

MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION

<http://www.maidstone.gov.uk/residents/planning/local-plan/examination>

SESSION 2A –HOUSING NEEDS (2)

Deadline for Statements: Thursday 15th September.

Please refer to the Inspector's Procedural Guidance Notes for information on the provision of hearing statements.

Inspector's Agenda with Matters, Issues, and Questions

1. The National Planning Policy Framework (the Framework) at paragraph 47 provides, amongst other things and in summary, that to boost significantly the supply of housing local planning authorities should:
 - *'Use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period'.*
2. This hearing session is concerned only with the level of objectively assessed needs and specifically with the representations of those who consider that the assessed need for 18,560 dwellings is too low. Session 1B considered whether that assessed need is too high.
3. Later sessions will consider the amount and location of housing supply that the Council is proposing to meet the level of need, having regard to any constraints that may exist and to any relevant policies in the Framework.

Issue (i) Whether the Objective Assessment of Housing Needs is based on the appropriate Housing Market Area or should make additional provision for needs arising in adjoining areas or for migration from areas where supply may be constrained.

4. Rydon Homes Ltd (R1974 & R19252) seeks that Maidstone update the 2014 SHMA / OAHN report taking into account recently published OAHN figures for the adjoining authorities of Tunbridge Wells, Tonbridge & Malling, Medway, and Swale and balance the fact that these Authorities may require Maidstone to take on board 'inevitable' un-met housing need in their areas.
5. The Maidstone Housing Market Area includes parts of Tonbridge and Malling. Swale had previously indicated that there would be unmet housing need but has since adjusted their own local plan housing supply and no longer seek provision in Maidstone. The other authorities have not requested cross border provision during engagement under the Duty to Cooperate.
6. Tunbridge Wells adjoins Maidstone but is in a different Housing Market Area shared with Sevenoaks. However Rydon points out that Tunbridge Wells is constrained by Green Belt and AONB designations and that its own assessed housing needs of 650 dpa are more than double the South East Plan housing target of 300dpa. Sevenoaks is in a similar position. Neither authority has yet identified a supply target. Sevenoaks is separated from Maidstone by Tonbridge and Malling which however is also partially within the Green Belt.
7. Pegasus Group R19428 claims that the OAHN does not adequately account for the housing needs of Tonbridge & Malling or Ashford where the Housing Market Areas overlap the local authority boundaries and that there was a lack of evidence that the duty to cooperate had been met in this regard. Taylor Wimpey R19215 expressed similar views in relation to cross border needs identification.
8. Since the consultation the Council has issued a Statement of Compliance with the Duty to Cooperate [Document SUB 008].

Qn2.1 Whereas the Framework seeks to meet needs in the housing market area, and the SHMA has acknowledged that these may include migration from London, would there also be migration from other Kent authorities if they cannot meet their own housing needs due to Green Belt and other constraints (including any migration from London deflected away from those authorities)?

Qn2.2 If so, is it feasible to assess such cross-border needs before those authorities have identified their own housing targets?

Qn2.3 What implications would assessing such cross border movements have for the local plan timetable and for the delivery of other development?

Qn2.4 Should the matter be left to the first review of the Local Plan, by which time the other authorities should each have up-to-date local plans?

Issue (ii) Whether the OAHN includes an adequate adjustment for affordability.

9. Section 3 of the PPG advises that market signals are to be taken into account when assessing housing needs, including affordability. A 5% increase above the demographic projection has been added resulting in an additional 44 dwellings per year.
10. The Home Builders Federation (HBF) (R19567) considers that the 5% uplift is too small and should be 10% (as said to be used by some other districts) as a more positive response towards improving affordability and providing a 'significant boost' to the supply of housing. Separate adjustments are suggested for suppression of household formation and affordability. However the HBF preferred overall figure of 974dpa only includes a 5% adjustment.

Qn2.5 Does HBF still seek a 10% adjustment?

Qn2.6 If so, is there any evidence to support that percentage figure?

Qn2.7 Is the suppression of household formation only a symptom of unaffordability in which case why would it be assessed separately?

Qn2.8 Which other districts have used those higher percentages and how did they arrive at them?

Issue (iii) Whether the OAHN should include an allowance for increased population as a consequence of changing migration patterns with London

11. The HBF points to a paucity of housing supply in London relative to identified needs and suggests that Maidstone's direct rail links will lead to relatively more affluent households moving to Maidstone for more affordable accommodation and acquiring homes at the expense of local residents. This it is suggested would increase the local affordable housing need more sharply. HBF seeks a 5.1% adjustment (+45 dwellings per annum) and that the adjustment would precede the 5% market adjustment leading to an overall annual figure of 974dpa (19,480 over the Local Plan period instead of 18,560). Other housebuilders and developers expressing similar views are: Gladman Developments (R19289/R19284) ; Anderway Ltd (R19100); Reside Developments Ltd (R19414); and Graham Norton (various clients) .

12. The population projections already make some allowance for migration. However the SHMA Update of June 2015 [HOU 003] includes an appended Sensitivity Analysis for Migration to/from London. This indicates that whilst migration fell due to the recession and has informed the population projections, the London Plan expects it to increase again. The midpoint between pre-recession and post-recession migration which underpins the London Plan would result in a population increase in Maidstone during the Local Plan period of 36,123 (23.2%) instead of the 33,811 used in the SHMA (21.7%).

Qn2.9 Why has the Council not adopted the higher population projection indicated by the London migration sensitivity analysis?

Qn2.10 Does the Council accept that higher levels of net migration from London would adversely affect the supply of available housing and affordability in Maidstone?

Issue (iv) Effect of the 2014 based household projections

13. Updated Household Projections have recently been published by the DCLG

Qn2.11 What are the implications for Maidstone of the latest Household projections?