

MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION

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

SESSION 5A – HOUSING SUPPLY

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. Introduction

- 1.1. This session concerns the Council's calculation of overall housing supply. The suitability of supply from specific allocations will be addressed at the housing sessions for local areas. The invited participants are those who have submitted significant evidence in representations that assert that the housing supply is inadequate.

2. Housing Land Supply in the Submitted Plan

- 2.1. Paragraph 4.3 and Table 4.1 in the submitted plan set out the housing supply calculation as at 30 November 2015. They indicate a total supply from all sources of 18,481 dwellings. Whilst the text suggests that this would meet the Objectively Assessed Housing Need (OAHN) in full, there would be a shortfall since the OAHN is 18,560 dwellings. The plan would on that basis alone not be meeting the full OAHN as sought by national policy.
- 2.2. A number of representations from the Home Builders Federation and from others seeking additional supply allocations claim that the supply would be inadequate owing in particular to:
 - a) The suggested need for a non-implementation allowance for existing commitments and the allocated sites
 - b) Whether the allowance for windfall development is supported by sufficient evidence.
 - c) Uncertainty about the delivery of the Policy H2 broad locations housing

- 2.3. Those opposing some housing site allocations have suggested that the windfall allowance in the submitted plan is too low as it does not include any windfall within the first 5 years.

3. Housing Topic Paper

- 3.1. The submitted Housing Topic Paper [SUB 005] includes an updated housing land supply position at 31 March 2016. This suggest an improved supply of 19,325 which would represent a surplus of 765 dwellings over the OAHN.
- 3.2. A 5% allowance has been included for non-implementation of extant planning permissions.
- 3.3. There is an increased windfall sites contribution which includes and the bringing forward of the commencement of that contribution period from 2022 to 2019 (thus only the first 3 years of the plan period are excluded). The paper sets out how the windfall allowance has been calculated.
- 3.4. There is commentary on the 3 Broad Locations with an updated position:
- a) The estimated yield from the Maidstone Town Centre Broad Location has been increased from 700 to 990 dwellings
 - b) An MoD decision on the Invicta Park Barracks is expected in the autumn
 - c) The Lenham Broad Location is expected to be delivered between 2026 and 2031 and additional studies have been undertaken or are proposed.

Qn5.1 Is the Council proposing a formal modification to the land supply information in the Local Plan?

Qn5.2 Is the Council proposing a formal modification to the H2(1) policy?

Qn5.3 Is the proposed 990 dwelling yield for H2(1) (Town Centre) adequately justified?

Qn5.4 What should happen were the MoD not to make Invicta Park Barracks surplus to requirements?

Qn5.4 Is it realistic to expect the H2(3) Lenham Broad allocation for 1,500 dwellings to be delivered within a 5 year period?

Qn5.6 Is the Council's revised windfall allowance justified?

Qn5.7 Can the Council estimate how many windfall sites are included in current extant planning permissions in order to support their view that there would be double counting if the allowance were to be brought forward to an earlier date?

Qn5.8 Is the 5% allowance for non-implementation reasonable?

3.5. Some Representors seek the allocation of reserve housing sites.

Qn5.9 Is there a need for reserve allocations in case anticipated supply is not forthcoming and if so:

a) How much reserve supply would be needed?

b) Should such sites be allocated now or in a review of the Local Plan?

c) How would sites be selected?

d) What would trigger their release

4. 5 Year Land Supply

4.1. The National Planning Policy Framework requires the Council to maintain a 5 year supply of specific deliverable sites with an additional buffer of 5%

(moved forward from later in the plan period). Where there has been a record of persistent under delivery that buffer should be increased to 20%.

- 4.2. Whilst the Council was able to demonstrate adequate supply against the former South East Plan targets which applied until March 2013, in recent years since the OAHN was assessed it has not been able to demonstrate a 5 years supply. However the Housing Topic Paper includes at Table 5.1 a claimed 5 year housing supply at 1 April 2016. A rolling 5 year supply is provide at Appendix G.
- 4.3. The Council considers that only a 5% buffer is needed because of its record of delivery.

Qn5.10 Is the Council's 5 years supply calculation accepted or disputed and, if so, why?