

## Maidstone Borough Council

Maidstone House,  
King Street,  
Maidstone, Kent ME15 6JQ

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The Rt. Hon Robert Jenrick MP  
Secretary of State for Housing Communities and  
Local Government  
Ministry of Housing, Communities and Local Government  
2 Marsham Street  
London  
SW1P 4DF

Via Email: [PSRobertJenrick@communities.gov.uk](mailto:PSRobertJenrick@communities.gov.uk)

20 January 2020

Dear Secretary of State

### **Maidstone Local Plan Review and the Standardised Methodology for Assessing Housing Need**

We are writing formally to express the concerns that Maidstone Borough Council has in respect of the implications of the Standardised Methodology for Assessing Housing Need (SMAHN). The Council is committed to high quality place making and community engagement, and we feel that the SMAHN could well undermine these principles.

In October 2017 the Council adopted its Local Plan (LP) for the period 2011-2031, and has also committed to reviewing it, the Maidstone Local Plan Review (LPR), by October 2022. The adopted LP has an annual housing figure of 882 homes, and the Council has been fully focussed on delivering this. Owing to our strong track record of delivery, the Council has been able to maintain a Five-Year Housing Land Supply to guard against unwelcome development proposals and has also performed well against the Housing Delivery Test.

However, with the LPR underway, and the need to utilise the SMAHN, our housing growth requirement will rise by 40% per annum with effect from 2022, to 1236 homes per annum. The Council did respond to the government consultation in respect of the then proposed introduction of the SMAHN, raising its significant reservations but to no avail.

In terms of the LPR, the Council has the following serious concerns about the implications of the SMAHN;

- The 40% uplift in housing that will take effect at the mid-point of the current LP has eroded community trust in the plan making process. Therefore, community resistance with a firm anti-housebuilding sentiment is now widespread, with positive consultation and engagement extremely difficult to achieve.

- Maidstone has a very positive track record of housing delivery as detailed above. However, over the past five years much of our housing delivery has been achieved through the conversion of office space to residential through Permitted Development Rights. This supply of conversions is finite and so there is already an emerging housing delivery threat.
- Once Maidstone's housing number rises by 40% in 2022, although the Council can endeavour to make a plan to deliver that number annually through the LPR, it will be more dependant than ever on the private sector housebuilding to achieve those numbers, yet the consequences of those numbers not being delivered will fall upon the council. I.e. the national housebuilders, who currently provide the mainstay of delivery in the borough are very much focussed upon market absorption rates, in terms of how many sales per week they can generally achieve at each development site. Therefore, it would seem improbable that these same housebuilders will genuinely wish to raise their output by 40% in the borough.
- When trying to achieve a 40% increase in housing numbers, the 2022 date is extremely unhelpful as it does not allow for adequate time for the Council and the housebuilding sector as a whole to explore and bring forward larger garden community type proposals that could well be part of the solution. Such proposals tend to have a much longer incubation period, typically at least ten years. Therefore, were garden communities to be part of the new spatial strategy for Maidstone they would by the very nature result in under-delivery in the early years of the LPR period but could bring about over-delivery in the later years.
- The amount of government funding available for infrastructure projects to underpin housing and population growth is currently inadequate and so this position would seem likely to worsen in the SMAHN context. Over the current Local Plan period, infrastructure funding has largely been from S106 contributions, and so is only mitigating the impact of new development rather than redressing the longer-term deficit in infrastructure funding.

Despite these concerns, the Council fully intends to make a plan, through the LPR, that will seek to deliver the overall housing numbers driven by the introduction of the SMAHN, but because the prospect of delivering the number consistently would be a significant deviation from previous delivery, we would respectfully request MHCLG consider the following "asks";

1. That for the purposes of the 5-Year Housing Land Supply test, for Maidstone, this should be set at 882 homes per annum until 2031, being the end of our current Local Plan period.
2. That for the purposes of the 3-year Housing Delivery Test, for Maidstone this should be set at 882 homes per annum until 2031, being the end of our current Local Plan period.

3. That for our LPR purposes, increased housing growth brought about by the SMAHN will not be delivered by way of a straight-line trajectory from 2022 but instead incrementally with over delivery occurring in the later years of the LPR period between 2031 and 2037.
4. That the MHCLG revisit the SMAHN and consider markedly reducing the uplift cap (from 40%).

Maidstone Borough Council would be extremely grateful if you would respond positively in writing to these four "asks" so that your letter could ultimately be submitted to, and taken into account by, our eventual Local Plan Inspector. Furthermore, we would also welcome a meeting with you to discuss the matter in person, to be accompanied by both Maidstone MP's too.

This topic was debated at our Full Council meeting of 18<sup>th</sup> December 2019. Indeed, the Leaders of each of our five political groups are all supportive of these "asks", as is our MP for Maidstone and the Weald, all of whom are signatories to this letter.

Yours faithfully



**Cllr Martin Cox**  
**Leader of Maidstone Borough Council**



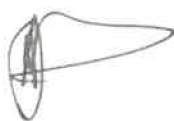
**Helen Grant MP**  
**Maidstone and the Weald**



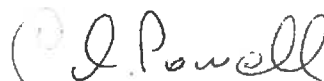
**Cllr John Perry**  
**Leader of Conservative Party**  
**Maidstone Borough Council**



**Cllr Fay Gooch**  
**Leader of Independent**  
**Party**  
**Maidstone Borough Council**



**Cllr Malcolm McKay**  
**Leader of Labour Party**  
**Maidstone Borough Council**



**Cllr Eddie Powell**  
**Leader of Independent**  
**Maidstone**  
**Maidstone Borough Council**