

Appendix 1 – Proposed response to the Technical consultation on updates to national planning policy and guidance (October 2018)

Q1: Do you agree that planning practice guidance should be amended to specify that 2014-based projections will provide the demographic baseline for the standard method for a time limited period?

A – Whilst this would give some certainty for those authorities which are close to submitting their plans for examination, the position is much less certain for councils like Maidstone BC which are 2 or more years from submission. The new 2018-based household projections are expected to be issued in Autumn 2020, ahead of the submission of Maidstone's Local Plan Review which is scheduled for March 2021. If the Government introduces a new approach at around this time, it could mean this council and others will be faced with a significant change to the local housing need figure for the borough and there is a risk that the plan's approach may need to be reviewed when the plan has reached an advanced stage if transitional arrangements are not in place.

MBC supports the principle of a standardised approach to help reduce the time, money and effort spent establishing what the 'correct' local housing need figure should be.

The new method, when devised, should retain the cap on how much the local housing need figure can increase by to give those preparing plans some ceiling on the scale of the increase that may be required. The cap should be no higher than the 40% figure which has been consulted upon previously and preferably significantly lower, coupled with achieving a more even national distribution of growth.

The Government should provide an outline of timescales when any new method will be consulted upon and implemented so that councils preparing plans can anticipate which method they will need to follow. This should include transitional arrangements so that plans at an advanced stage are not diverted off course. The housing number is a fundamental part of the plan-making process and can have implications for other aspects of the plan such as site selection and strategic infrastructure requirements amongst other things.

The new approach is an opportunity to address failings with the current approach, namely;

- the current methodology serves to perpetuate established patterns of household growth and to disproportionately load requirements on authorities such as Maidstone with the highest base populations and which have delivered good levels of housing in the past. The approach is considered to be demand-led with the outcome of increasing requirements in areas where there is considerable existing development pressure whilst reducing supply (principally in more northern authorities) where Strategic Housing Market Assessments have shown needs to be higher.
- The realism of achieving this rate of housebuilding is also at question on the grounds of the availability of sufficient labour, skills and materials, coupled with a concern that housebuilders have an incentive to manage build out rates to maintain house prices at or above current levels.

Q2: Do you agree with the proposed approach to not allowing 2016-based household projections to be used as a reason to justify lower housing need?

A – As one of the purposes of introducing the standardised methodology is to reduce uncertainty, the Government should be definitive in whichever route it chooses. It would seem contradictory to guide councils to use the 2014-based projections in the short term but then allow for the use of the 2016-based projections ‘exceptionally’.

Q3: Do you agree with the proposed approach to applying the cap to spatial development strategies?

A – No objection.

Q4: Do you agree with the proposed clarifications to footnote 37 and the glossary definition of local housing need?

A – No objection.

Q5: Do you agree with the proposed clarification to the glossary definition of deliverable?

A – No objection to the clarification. The introduction of future guidance to reduce unnecessary debate and challenge at appeals and examination is welcomed.

Q6: Do you agree with the proposed amendment to paragraph 177 of the National Planning Policy Framework?

A – No objection to the clarification.