

Appendix 2

KALC Response

Proposal 1: statistical base for the Review should be carefully chosen, building in flexibility to amend the statistical set as the Review proceeds and, ideally, to adjust the defined housing need and trajectory as the Review then rolls out over subsequent years.

Response: As KALC identify, the statistical inputs to the Government's standard methodology will be updated; new household projections are generally issued every two years and the affordability ratio is updated annually. The 'local housing need' figure for the borough may change before the LPR is submitted which may affect the amount of housing land needed and the LPR's approach may need to be adjusted accordingly. If the Government retains its 40% cap, the working figure of 1,236 dwellings/year should be at the upper end of what may be required.

Proposal 2: recognise that the needs-figure within the Review will be a step-function from the initial years of the Local Plan, with a step (in the appropriate direction) five years after adoption of the Local Plan.

Response: Agreed. MBC is able to anticipate and plan for the forthcoming uplift in the annual housing requirement through the LPR. This is a much better position than for the MBLP when the council had to respond to a retrospectively-applied higher housing target.

Proposal 3: aim for a flat trajectory and a combination of planning mechanism and planning conditions to provide flexibility to slow or accelerate build and assure Five Years' Housing Supply throughout the Review period (or at least until a further Review will inevitably take effect).

Response: KALC would like MBC to be able to manage planning permissions through conditions or other measures by specifying, for example, build rates or the timing of commencement. In fact this is not a power that the Government has awarded to local planning authorities such MBC. Indeed the Government's philosophy, which it has expressed through the NPPF since 2012, is that the market is best placed to manage supply in response to demand.

Proposal 4: take on board the fact that a front-loaded trajectory will also give rise to an accelerated population growth, when compared with a flat trajectory, and that, in turn, will give rise to a higher assessment of needs.

Response: The year on year variances in the Local Plan housing trajectory reflect 2 main facts; a) that there is a development cycle and rates of housebuilding are affected by a range of external factors of which the planning system is only one; and b) the under-delivery of housing in the early years of the plan period (2012/13 – 2015/16) has only been over-come by above-target housing completions in years 2016/17 -2019/20. The rate of housebuilding will not be consistent year on year and indeed cannot be managed (by the planning system) to be so. Arguments about a 'spike' in housebuilding were explored at the last Local Plan Examination but were not supported by the Inspector.

Proposal 5: adopt a can-do attitude towards examining all potential constraints, including AONB and Green Belt expansion, with a view to identification of those for which there is reasonable evidence that they have, or could have, effect.

Response: The NPPF is clear that the starting point is that 'plans should positively seek opportunities to meet the development needs of their area'. A local planning authority which approaches its plan-making with the intention of finding ways not to meet its needs would fall foul of the 'positively prepared' test of soundness.

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Proposal 6: ensure that windfalls are given their full weight within the Review and for the maximum period of years permitted by PPG.

Response: A windfall allowance is included in the housing land supply. The level of that allowance will follow the guidance in the NPPG.

Proposal 7: consider taking a degree of risk by adopting a non-standard method for assessing needs that smooths-out the trajectory errors in the Local Plan.

*Response: The Government's clear expectation is that the standard methodology will be used. Seeking out an alternative approach when there is no *prima facie* evidence that local circumstances are exceptional would be an unwarranted risk to the plan.*

Proposal 8: remain agile to the possibility of basing needs on a lower set of ONS household growth projections.

Response: as for Proposal 1

Proposal 9: develop an argument that there should be an adjustment for commuters, particularly those commuting to London.

Response: It is implicit in the Government's approach that it wants the supply of housing to increase so that prices will fall (or at least stabilise) and so, in turn, housing becomes more affordable for local people. The standard methodology's use of local incomes exactly reflects this philosophy.

Maidstone's commuting pattern is shared with all the authorities which surround London and indeed with those which surround other major cities. In these circumstances, a Maidstone-specific commuting adjustment would bring unjustified risk to the LPR's soundness.

Proposal 10: find and utilise any other possible adjustments to the baseline population figures that are projected forward by ONS.

Response: changes to the base population will be reflected in future issues of the population and household projections.

Proposal 11: explore all major sites for the possibility of defining a step in the trajectory.

Response: Agree that the NPPG allows for a stepped trajectory provided there is evidence to justify it and it does not defer needs being met. The trajectory should flow from the identification and testing of different spatial options ('the reasonable alternatives'). Only this way can the approach be fully justified. KALC's proposal infers the alternative i.e. that a decision to have a stepped trajectory drives the selection of sites.

Proposal 12: recognise that flexibility is key within the structure of the Review document, particularly so that we are not locked into an excessive assessment of needs, should reality deliver lower ONS projections.

Response: The Government has now introduced 5 yearly reviews of Local Plans. In effect this means that most Local Plans will be at some point in the review cycle. At each review, additional years are added to the plan period meaning that there will additional homes to plan for, albeit that the rate of growth may reduce.