

APPENDIX A: MAIDSTONE BOROUGH LOCAL PLAN 2014 CONSULTATION ISSUES AND RESPONSES TO POLICY DM24 AFFORDABLE HOUSING

Key Issue	No. in support	No. of objections	No. of observations	Details	Officer response	Officer Recommendation
1. The percentages proposed for the delivery of affordable housing should be amended	8	32	2	40% affordable housing for countryside, rural service centres and larger villages too high. Reasons being that these areas are the least suitable for new affordable housing as new tenants would probably require services found in more urban areas. Points highlighted include: lack of infrastructure, poor public transport, low employment opportunities in these areas, the impact on rural communities and that the high percentage in rural service centres would cause tenants who would be better housed in town centre / urban areas to move where they do not want to go to.	A fair balance must be struck between the viability of a scheme and the affordable housing provision. The council has a net affordable housing need of 5,800 homes between 2013 and 2031, which is a significant need and a clear justification for the council to seek affordable dwellings through new development schemes. Further viability testing has confirmed that the rural areas in Maidstone are more viable than urban locations, and brownfield sites (previously developed land) within urban areas are less viable than greenfield sites. A 40% affordable housing rate can be achieved in the rural areas and a 30% rate within and adjacent to the urban area, with two identified site exceptions that will accommodate a rate of 25% affordable housing which will allow for an appropriate balance of affordable housing with the need to provide for infrastructure. The local plan identifies the infrastructure required to support new development, but new development cannot mitigate existing infrastructure problems - only ensure that those problems are not exacerbated.	A 40% affordable housing requirement in the countryside, rural service centres and larger villages, and a 30% requirement in the urban area are recommended, with the exception of a 25% requirement for the Springfield (H1(11)) and Haynes (H1(12)) residential site allocations.
				15% affordable housing should apply to all previously developed land sites and not just in urban areas.		
				30% affordable housing should apply to all greenfield sites and not just urban and urban periphery.		
				All sites should contain 80% affordable housing or higher.		

2. Affordable housing should be decided on a site specific basis	0	1	0	Affordable housing should be decided on a site specific basis.	A clear policy that sets out the affordable housing provision that is expected from developments gives clarity and certainty to developers, land owners and the public. The policy, as amended, offers flexibility and developers can assess the viability of an individual scheme in advance of submitting a planning application. The details of size, type and tenure of affordable housing will be decided on a site by site basis in accordance with the policy provisions. The policy, as amended, identifies exceptions to geographical differentiation.	A 40% affordable housing requirement in the countryside and villages and a 30% requirement elsewhere is recommended, with the exception of a 25% requirement for the Springfield (H1(11)) and Haynes (H1(12)) residential site allocations.
3. The new affordable housing provision percentage figures are too complicated	0	1	0	The new affordable housing provision percentage figures are too complicated	The council has a net affordable housing need of 5,800 homes between 2013 and 2031, equivalent to 322 households each year. There is therefore a clear and significant need for new affordable housing in the borough. The percentage requirements have been reviewed in the light of updated viability testing, which demonstrates rural areas are more viable than urban locations, and brownfield sites (previously developed land) within urban areas are less viable than greenfield sites. The policy retains 3 affordable housing rates but the geographical differentiation is simplified.	A 40% affordable housing requirement in the countryside, rural service centres and larger villages, and a 30% requirement in the urban area are recommended, with the exception of a 25% requirement for the Springfield (H1(11)) and Haynes (H1(12)) residential site allocations.

4. Policy should highlight a reasonable and flexible approach	0	0	4	Policy should highlight a reasonable and flexible approach	The council acknowledges that every development is different and each has varying costs and issues associated with it. The council needs to ensure that the provision of affordable housing for the borough is met whilst understanding that developers need to obtain a reasonable return. The policy already includes a flexibility clause, and setting an indicative tenure split in the policy will introduce greater flexibility to respond to changes in housing need.	An indicative target of 70% affordable/ social rent and 30% intermediate housing is recommended, but with modifications to the policy wording to ensure flexibility subject to viability and/or evidence of the needs for different tenures at the time of the application.
5. Ensure bungalows are part of any affordable scheme	0	0	1	Ensure bungalows are part of any affordable scheme	Policy DM23 of the draft Maidstone Borough Local Plan specifically covers housing mix. The exact affordable housing mix will be discussed with the developer and will take into account the housing needs of existing, emerging and future projected households, together with the proposed layout and characteristics of individual sites.	No change to policy.
6. Local needs housing should be on all developments	0	1	0	Local needs housing should be on all developments	Local needs housing is specifically covered under Policy DM25 of the draft Maidstone Borough Local Plan 2014. This policy sets out the detail about when local needs housing can be considered and delivered. It would not be appropriate to introduce a blanket policy for local needs housing on all developments as there may not be a specific identified local need for all sites. This in turn could lead to affordable dwellings being vacant due to not having enough eligible applicants to consider as a result of the strict local connection occupancy criteria that exists for local needs housing schemes.	No change to policy.

7. Adopted relevant neighbourhood plans should be taken into account	0	0	2	Adopted relevant neighbourhood plans should be taken into account	The council acknowledges that neighbourhood plans need to be considered in the wider housing and planning context. Their relevance will be better highlighted in the Regulation 19 version of the draft Maidstone Borough Local Plan, but should not be specifically included as part of the affordable housing policy.	No change to policy.
8. 65% Affordable / Social Rented Housing – 35% Intermediate Affordable Housing split should be more even to address local needs	0	2	0	65% Affordable / Social Rented Housing – 35% Intermediate Affordable Housing split should be more even to address local needs	Updated viability testing recommends setting an indicative target seeking a range of tenures around 70% affordable rent and 30% intermediate housing to allow flexibility where schemes are marginal. Setting an indicative tenure split will introduce greater flexibility to respond to changes in housing need. The delivery of affordable housing must give greater priority to affordable rented housing due to the significant need for such accommodation on the council's housing register.	An indicative target of 70% affordable/ social rent and 30% intermediate housing is recommended, but with modifications to the policy wording to ensure flexibility subject to viability and/or evidence of the needs for different tenures at the time of the application.