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Matthew Pennycook

Minister of State for Housing and Planning

Email: psmatthewpennycook@communities.gov.uk

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Dear Minister,

Maidstone Borough: Standard Method housing requirement and practical deliverability

Maidstone Borough Council supports the Government's objective of increasing housing supply and remains committed to planning positively for the homes our communities need. Maidstone has accommodated substantial growth over a sustained period. Our concern is not with the principle of sustainable growth, but with whether the annual requirement now produced by the Standard Method is technically capable of being delivered by the market and development industry.

For Maidstone, the current Standard Method produces a figure in the region of almost 1,400 homes per annum, equivalent to around 21,000 homes over a 15-year plan period. This follows successive increases from 883 homes per annum in the 2017 Local Plan to 1,157 homes per annum in the adopted 2024 Local Plan Review. The scale and pace of this uplift raise a fundamental question as to whether the resulting requirement remains a credible basis for delivery-focused plan-making.

A strong record of plan-led housing growth

Maidstone has a strong track record of producing and adopting Local Plans that seek to meeting objectively assessed need. The most recently adopted Local Plan Review (March 2024) contains 28 residential site allocations. Thirteen have planning consent and a further five have applications pending, representing 1,810 homes. The Plan also contains three strategic-scale developments at Heathlands, Lidsing and Invicta Park, with an overall anticipated capacity of approximately 8,300 homes.

Maidstone borough has also delivered significant housing growth on the back of its Local Plans. Between April 2011 and March 2026, the borough has recorded a net additional 14,207 homes, an average of approximately 947 homes per year. This level of completions represents one of the, if not *the*, highest total identified for any Kent district over that period.

Land supply and planning permission are not the same as delivery

However, despite having an up-to-date Local Plan seeking to meet full identified needs, the Council's most recently published Housing Delivery Report 2026 records 777 net completions in 2025/26 (against a requirement for 1,000 homes); a Housing Delivery Test result of 93% (requiring an Action Plan for the first time since the introduction of the Housing Delivery Test); and just a 3.6-year housing land supply. These figures show that, despite a positive planning approach and a substantial development pipeline, actual delivery is falling below already demanding requirements.

The five-year supply assessment illustrates the same point. Against a five-year requirement, including adjustments and the buffer, of 5,770 homes, the Council identifies 4,223 deliverable homes. This position has arisen only two years after adoption of the Local Plan Review in March 2024. The technical challenge is therefore more complex than identifying additional land. Allocations and permissions cannot, by themselves, ensure that developers accelerate build-out or that the market can absorb the resulting homes.

The current Standard Method requirement makes it increasingly difficult, and potentially impossible, to demonstrate a five-year supply even where the Council has allocated substantial land, including two garden communities, and granted permissions. The consequence is not simply a technical shortfall: it fundamentally weakens the credibility of the NPPF by significantly restricting the chances of statutory development plan primacy and materially reduces the Council's ability to manage where, when and how development takes place.

If the requirement is continually raised to a level that cannot realistically be translated into completions, the five-year supply test becomes structurally unattainable rather than a meaningful measure of effective plan-making. This exposes the borough to speculative development that is placed in locations which have already experienced significant development and where existing infrastructure cannot cope; rather than into areas that have been properly planned through engagement with infrastructure providers and consultation with the public at multiple stages.

Why 1,400 homes per annum is not a credible delivery trajectory

The Standard Method may provide a consistent calculation of housing need, but that calculation should not be treated as proof that the same number can be completed each year. In Maidstone, the long-term average identified in Council evidence is approximately 947 homes per annum, while the latest monitoring year produced 777 completions.

Sustained delivery of around 1,400 homes per annum would require a material and continuing increase in build-out rates, effective purchaser demand, development finance, construction capacity and timely infrastructure provision.

The method also risks creating a ratchet effect. An authority that has delivered substantial historic growth increases its dwelling stock and therefore its future stock-based requirement, even where the local market and industry cannot increase delivery at a comparable rate. Successful previous delivery can consequently produce a still higher future target, deviating further from what the market can actually deliver.

There are, of course, a multitude of factors contributing to Maidstone's current housing land supply position, not least macro-economic factors and overlapping markets for finance, labour, materials, infrastructure provision and purchasers. However, longer-term trends clearly illustrate a disconnect between the standard method requirement and what the market can build in the area.

A more measured and deliverable approach

Maidstone is not seeking to avoid meeting housing need and has indeed already begun to prepare a New Local Plan under the new planning system. The borough has significant affordability pressures and the Council remains committed to delivering market and affordable homes. However, ambitious requirements must also be credible and capable of implementation.

We therefore ask Government to consider complementing the Standard Method with a clearer mechanism through which robust evidence of market absorption, historic build-out rates, development viability, infrastructure lead-in times and construction capacity can inform realistic plan trajectories. In particular, we would welcome:

- greater recognition of stepped trajectories where a substantial uplift depends on strategic infrastructure and long lead-in times;
- a deliverability adjustment, based on robust local evidence, that affects the pace rather than the underlying ambition to meet need;
- clearer policy recognition that increasing allocations and permissions cannot guarantee increased completions where effective demand, viability or construction capacity are constrained;
- consideration of cumulative regional requirements and the shared capacity of the development industry and infrastructure providers in that regard; and
- corresponding national interventions to support purchaser affordability, infrastructure, affordable housing, SME builders and development viability.

Fundamentally, setting requirements materially above demonstrable delivery capacity does not itself produce additional homes. It does, however, risk persistent housing-land-supply deficits, Housing Delivery Test consequences and speculative development, often in locations that lack the requisite infrastructure and/or disproportionately impact landscape and biodiversity, and without addressing the underlying economic, infrastructure and industry constraints that determine how quickly homes are built.

We therefore urge Government to adopt a more measured, evidence-led approach that distinguishes housing need, housing land supply and actual housing delivery. We would welcome the opportunity to discuss Maidstone's evidence with MHCLG and to contribute constructively to future consideration of the Standard Method and the wider delivery framework.

Yours sincerely,



Tony Harwood

Cabinet Member for Planning Policy and Management
Maidstone Borough Council