

Session 2A –Housing Needs (2).

Inspector's Question 2.1

Whereas the Framework seeks to meet needs in the housing market area, and the SHMA has acknowledged that these may include migration from London, would there also be migration from other Kent authorities if they cannot meet their own housing needs due to Green Belt and other constraints (including any migration from London deflected away from those authorities).

Council's response

2.1.1 The Council considers that it is important to distinguish between the approach to defining objectively assessed need which Planning Practice Guidance outlines should be undertaken on a policy-off basis, and discussions regarding meeting unmet needs from other areas which are a policy matter to be agreed through the Duty to Cooperate. This distinction is important in avoiding double counting.

2.1.2 As the question states, the Framework requires the Local Plan to meet the FOAN for housing in the housing market area (paragraph 47). It does not require the Local Plan to accommodate housing needs from beyond the housing market area. The majority of the borough falls within the Maidstone HMA which extends to include parts of Tonbridge & Malling borough to the west. The eastern most wards fall within the Ashford HMA (see HOU 004 Tables 20 & 21, page 73).

2.1.3 It is the Council's position that the borough FOAN of 18,560 dwellings will be met through the provisions of the Local Plan. Both Tonbridge & Malling and Ashford Borough Councils have stated their intentions to meet their respective FOAN. This is confirmed in the Duty to Co-operate statement (SUB 008) and is reaffirmed in the Statements of Common Ground (SUB 013 & SUB 017) with these two authorities. There are therefore no identified unmet needs from the two authorities with which Maidstone Borough shares housing market areas.

2.1.4 For the avoidance of doubt, there are also no current requests for Maidstone borough to accommodate unmet housing needs emanating from any other Kent district/borough or from any London Boroughs.

2.1.5 Tunbridge Wells Borough Council and Sevenoaks District Council are cited in the representations as authorities with Green Belt and AONB constraints. Both these authorities are at an early stage in their plan making process. A joint SHMA has been completed but neither authority has completed the studies, including reviewing land availability and green belt, necessary to test the potential to accommodate their needs within their own local authority area.

2.1.6 It is by no means a 'fait accompli' as implied in the HBF's and others' representations that these authorities will not be able to meet, or indeed substantially meet, the FOAN identified. It is noted that other authorities within the region with significant Green Belt coverage – such as Waverley and Guildford in Surrey - have developed draft local plans which

recommend housing targets which significantly exceed levels in the South East Plan and meet their FOAN.

2.1.7 It is only after thorough testing of land availability, including a Green Belt review (which both authorities are undertaking), that any unmet need would be identified. The next action under the Duty to Co-operate will be for these authorities to approach their neighbours within their own HMA.

2.1.8 Only after this has been fully explored, and if there is still a quantum of unmet needs, would a potential next step be for authorities outside the HMA to be approached such as Maidstone.

2.1.9 Paragraph 2.15 in the SHMA (HOU 002) identified that migration relationships between Sevenoaks or Tunbridge Wells and Maidstone are relatively weak. The Sevenoaks and Tunbridge Wells SHMA 2015 (ORD 037) identifies that the principal adjoining authorities with which these areas have a strong relationship are Tonbridge & Malling, Wealden and Rother. Whilst this clearly does not mean in itself that Maidstone BC would not need to actively consider an approach on a matter of an unmet need, it serves to highlight that there are other authorities with which there are stronger migration relationships which itself would form part of the Council's consideration.

2.1.10 There is therefore a sequence of events which would need to happen before the existence of any actual additional housing needs from other Kent authorities outside the Maidstone HMA, and above that already built into the CLG projections, could be confirmed.

Inspector's Question 2.2

If so, is it feasible to assess such cross-border needs before those authorities have identified their own housing targets?

Council's response

2.2.1 In short, no. No unmet need which the Maidstone Local Plan could or should accommodate has been identified. Further, there is no quantification of what an (unconfirmed) shortfall might be should it arise, meaning that in practical terms, any resultant change to the Plan's housing target at this point could only be based on conjecture rather than evidence, contrary to paragraph 158 of the Framework. It is also not possible to pinpoint which authority's unmet needs would be being met, bringing a risk that needs will be planned for twice in two different authorities' Plans.

Inspector's Question 2.3

What implications would assessing such cross border movements have for the local plan timetable and for the delivery of other development?

Council's response

2.3.1 The main implication is that there will be a delay, likely to be substantial, to the adoption of the Local Plan.

2.3.2 As stated in the response to Q2.2, other authorities would need to have first undertaken a full, critical assessment of their capacity to accommodate their own OAN,

established whether any unmet need arises and, if so, have active discussions with the authorities within their own housing market area through the Duty to Co-operate.

2.3.3 A delay to the adoption of the Local Plan for this issue will delay the point at which the Local Plan has full weight in the determination of planning applications and thereby delay the certainty that an adopted Local Plan gives for all of those with an interest in development in the borough. In short it would slow down housing delivery in Maidstone Borough.

2.3.4 The Council's position is that for the Local Plan to progress, with all reasonableness, it must be based on the best information available at a given point. It would be counterproductive to achieving a plan-led system¹ for progress of the Maidstone Local Plan to be delayed whilst other authorities earlier in the process advance their plans.

2.3.5 Further, the July 2015 ministerial statement² confirms the Government's expectation of immediate progress with Local Plans, with early 2017 being given as the date for when plans must be 'produced'. Delaying the Maidstone Local Plan would be contrary to this instruction and would have the perverse result of Plans only being able to progress at the pace of the slowest. This is clearly not what the Government intends.

Inspector's Question 2.4

Should the matter be left to the first review of the Local Plan, by which time the other authorities should each have up to date local plans?

Council's response

2.4.1 In short, yes. A review of the Plan is the correct and only mechanism to reassess the housing target and any opportunities to accommodate any needs arising from outside the Maidstone HMA.

Inspector's Questions 2.5 & 2.6

Does HBF still seek a 10% adjustment?

If so, is there any evidence to support that percentage figure?

Council's response:

2.5.1 The Council's evidence provides for a 5% adjustment. No evidence or justification is provided by the HBF for separate adjustments, or to justify a 10% figure.

2.5.2 The SHMA approach is evidence-based: it recognises that declining affordability has influenced household formation amongst younger households aged 25-34; and thus an improvement in affordability would see household formation rates amongst this group improve. It recognises that for homes to be built and occupied, there need to be households to occupy them.

2.5.3 The Council does not agree that affordability affects all age groups: it particularly affects younger age groups, as for older age groups many households are existing owner

¹ NPPF paragraph 17

² <http://www.parliament.uk/documents/commons-vote-office/July%202015/21%20July/8-Communities-and-Local-Government-Local-Plans.pdf>

occupiers and thus price increases increase their wealth. Government itself, through the Starter Home initiative, recognises that affordability particularly affects those in their 20s and 30s.

2.5.4 The Plan clearly boosts significantly housing supply.

Inspector's Question 2.7

Is the suppression of household formation only a symptom of unaffordability in which case why would it be assessed separately?

Council's response

2.7.1 Yes. The evidence shows that a key impact of affordability pressures has been in reducing the ability of younger households in their late 20s and early 30s to form since the late 1990s. However the evidence indicates that the fall in household formation has not been as significant as has been seen in other parts of the region, consistent with evidence of stronger relative housing delivery seen in Maidstone Borough.

2.7.2 Whilst affordability pressures have not been the only factor which is likely to have influenced the fall in household formation amongst those in their late 20s and early 30s, it has been an influence. An improvement in affordability would support improved household formation amongst younger households in these age groups; and indeed the increase in household formation could only be achieved if housing supply increased to make homes available.

Inspector's Question 2.8

Which other districts have used those higher percentages and how did they arrive at them?

Council's response

2.8.1 The Council is aware of examples where consultants have proposed adjustments of 10% or 20%, for instance in Crawley and Canterbury. This has principally been done by contrasting market conditions with Eastleigh and Uttlesford where Inspectors have recommended a 10% adjustment in Local Plan Examinations. However this represents selective referencing of Inspector's decisions, and it is worth noting that Inspectors have found that 10% adjustments recommended in Councils' evidence at examinations in Crawley and Sefton have both been rejected as unjustified, whilst Inspectors in Stratford-on-Avon and Cotswold found that there was no evidence of worsening of market signals in relative terms and rejected the case for an upward adjustment.

2.8.2 The approach in the SHMA Update seeks to ground the issue in the evidence. There is no evidence that migration to Maidstone has been constrained. The evidence does not point to a significant relative worsening of market signals. Household formation has fallen, and it is reasonable to assume that an increase in housing supply would help more young people form households and reduce levels of those sharing and living with parents. This approach, which allows an adjustment to be calculated on an evidential basis, has been supported a number of examinations, including in Herefordshire, Chichester, Brighton and Hove, Lewes and Horsham.

Inspector's Question 2.9

Why has the council not adopted the higher population projection indicated by the London migration sensitivity analysis?

Council's response

2.9.1 National Planning Practice Guidance on the preparation of strategic housing market assessments is specific that the household projections prepared by the CLG should be the starting point for assessing FOAN³. This has been the case for the iterations of the Maidstone Strategic Housing Market Assessment (HOU 002/003/004). The CLG projections take account of migration from elsewhere in the country into the borough, including from London. Indeed, some 46% of the population growth projected for the borough stems from such internal migration (HOU 002, page 101, paragraph 6.35). A level of migration from London is therefore an inherent component of the CLG projections and thereby in the FOAN of 18,560 dwellings upon which the submission Local Plan is based.

2.9.2 The Greater London Authority (GLA) has undertaken bespoke population and household projections in support of the London Plan and its subsequent alterations. The GLA has identified that the 2007-9 recession disrupted the established scale of migration to and from London to its hinterland. The GLA developed a series of projections incorporating differing migration assumptions to feed into the Further Alterations to the London Plan (FALP).

2.9.3 The London Plan and its alterations have now been consolidated into a single document entitled 'The London Plan: the spatial development strategy for London consolidated with alterations since 2011 (March 2016)' (ORD 040 (A) and (B)) ('The consolidated London Plan').

2.9.4 Paragraph 1.10A of the consolidated London Plan was added as part of the FALP (March 2015) and therefore is a recent and highly relevant addition. This paragraph identifies that during the recessionary period the volume of house sales fell substantially in London and the wider south east and, whilst there is evidence of recovery, *"it is too soon to know what the migration implications of this may be and how they will bear on future population trends.* The recently identified major upturn in population growth may, in part at least, be based on cyclical rather than structural factors. *Just how far that may be true will only become clear once data is available to test whether the trend has 'bedded down', and if so at what level.* " (emphasis added).

2.9.5 Indeed, whilst the consolidated London Plan is based on a 'central' demographic scenario, the GLA also prepared 'high' and 'low' scenarios. The high scenario assumes that the identified fall in net out migration from London since 2008 represents a more fundamental structural change which will continue. The low scenario assumes a more complete return to the pre-recession scale of out-migration from London. 2.9.6

2.9.6 In short, the GLA itself acknowledges that there is considerable uncertainty about exactly what demographic shifts are in play and whether, and to what extent, the trends identified will continue. It takes the view that such uncertainties mean that it is unrealistic to plan for the whole plan period (to 2036) (paragraph 3.16A).

2.9.7 The London Plan itself concludes that some 49,000 additional dwellings are needed per annum (2015-36). Policy 3.3 'Increasing housing land supply' states that *at least* an annual

³ Housing and Economic Needs Assessments, Paragraph: 015 Reference ID: 2a-015-20140306

average of 42,000 net additional homes will be delivered. The supporting text makes clear that this is to be supplemented with other sources of supply (paragraph 3.19).

2.9.8 Any unmet needs relative to this target would be need to be addressed by individual London boroughs through the mechanism of Duty to Co-operate. At this point, the Council has not been approached by any of the London boroughs.

2.9.9 Further, the need to review the housing target by 2019/20 is an explicit requirement of Policy 3.3 (C). This reflects the statements made elsewhere in the consolidated London Plan that time needs to elapse before firmer conclusions can be reached on the permanency or otherwise of the identified migration trends to/from London.

2.9.10 Any case to uplift Maidstone's FOAN to accommodate a need which may or may not transpire from London is therefore highly uncertain at this point. This is therefore best considered further through a plan review, at which point there will be greater clarity on the issue.

2.9.11 Further, there are no structural arrangements in place to ensure that the implications of out-migration from London at rates above-CLG projections are addressed in a consistent and co-ordinated manner across the South East authorities. An upwards adjustment to Maidstone's OAN would be an 'ad hoc' response which may not be replicated elsewhere.

Inspector's Question 2.10

Does the Council accept that higher levels of net migration from London would adversely affect the supply of available housing and affordability in Maidstone?

Council's response

2.10.1 The Council considers that this would ultimately be influenced by the balance between supply and demand for housing. However it recognises that in-migrants can command higher earnings and may out-compete local residents in accessing market housing, and contribute to housing cost inflation.

Inspector's Question 2.11

What are the implications for Maidstone of the latest household projections?

Council's response

2.11.1 The preparation of the Local Plan was based on the best evidence and information available prior to its submission. In terms of household projections, this was the 2012-based household projections published by the CLG in February 2015. After the Plan was submitted on 21st May 2016, the ONS published 2014-based population projections on 25th May which were followed by 2014-based household projections from the CLG on 12th July.

2.11.2 The Council considers that there is no obligation expressed in either the Framework or the Practice Guidance that it be required to continually update the Plan post submission. Indeed the guidance with respect to strategic housing needs assessments confirms that previous assessments are not automatically rendered out of date simply by the publication of new projections⁴. The Council's view is that 2012-based household projections represent a

⁴ Paragraph: 016 Reference ID: 2a-016-20150227

reasonable and sound basis for assessing future housing needs in the borough for the Plan period.

2.11.3 This position understood, the Council has sought to consider the level of housing need implied by the latest household projections for the Inspector's information. This is set out in the accompanying briefing paper in Appendix A. This paper applies a consistent methodology to that used in the June 2015 SHMA (HOU 004) and its preceding iterations. The paper indicates that the new household projections imply a housing need of 19,230 dwellings (962 dwellings/annum) (see Table 7 of the briefing paper).

2.11.4 The projected household growth is 3.6% stronger than in the previous 2012-based household projections over the plan period. This is moderated by more recent evidence which indicates that the level of vacant homes in the District has fallen over the last 5 years. Applying this lowered vacancy rate results in an implied housing need of 19,060 (953 dwellings/annum) (see Table 9 of the briefing paper).

2.11.5 The Council considers that the scale of difference between the 2012- and 2014-based Household Projections is modest, and well within the error margins associated with long-term predictions.

2.11.6 Commentary in the planning press has advocated that there should not be too hasty a response to these latest figures, particular for Local Plans such as the Council's which are well advanced (see Appendix B). Indeed, as an example, CLG has advised Liverpool Council to maintain momentum and progress its Plan based on the preceding projections, even though the Plan has not yet reached its submission stage.

2.11.7 There is inevitably a level of volatility with population and household projections, with uncertainty regarding future migration trends enhanced as a result of the Brexit vote. Over time, this factor could affect the rates of international in and out migration and the net balance between them. For Maidstone, international migration accounts for some 27 % of projected population growth (HOU 002, page 101, paragraph 6.35).

2.11.8 The Council recognises these uncertainties but considers that these are best dealt with through the future review of the plan. It considers that the latest projections however do not point to a significantly different level of housing need such that it would render the evidence base underpinning the submitted plan outdated.

Implications of 2014-based Household Projections

- 1.1 The Department for Communities and Local Government (CLG) published 2014-based Household Projections in July 2016, based on Office for National Statistics (ONS) 2014-based Sub-National Population Projections, published in May 2016.
- 1.2 The 2014-based SNPP are based principally on trends over the preceding 5-6 year period (2008/9 – 2014), which are projected forwards. The SNPP expect almost 24% population growth over the 2011-31 period: a particularly strong rate of growth relative to both regional and national averages.

Table 1: Projected Population Growth (2011-31) – 2014-based SNPP

	Population 2011	Population 2031	Change in Population	% Change
Maidstone	155,764	192,700	36,936	23.7%
Kent	1,466,466	1,747,776	281,310	19.2%
South East	8,652,784	10,053,159	1,400,375	16.2%
England	53,107,169	60,853,179	7,746,010	14.6%

Source: ONS

- 1.3 The new projections indicate population growth of 36,900 over the 2011-31 period, representing growth in population which is 10% stronger than expected in the previous 2012-based SNPP.

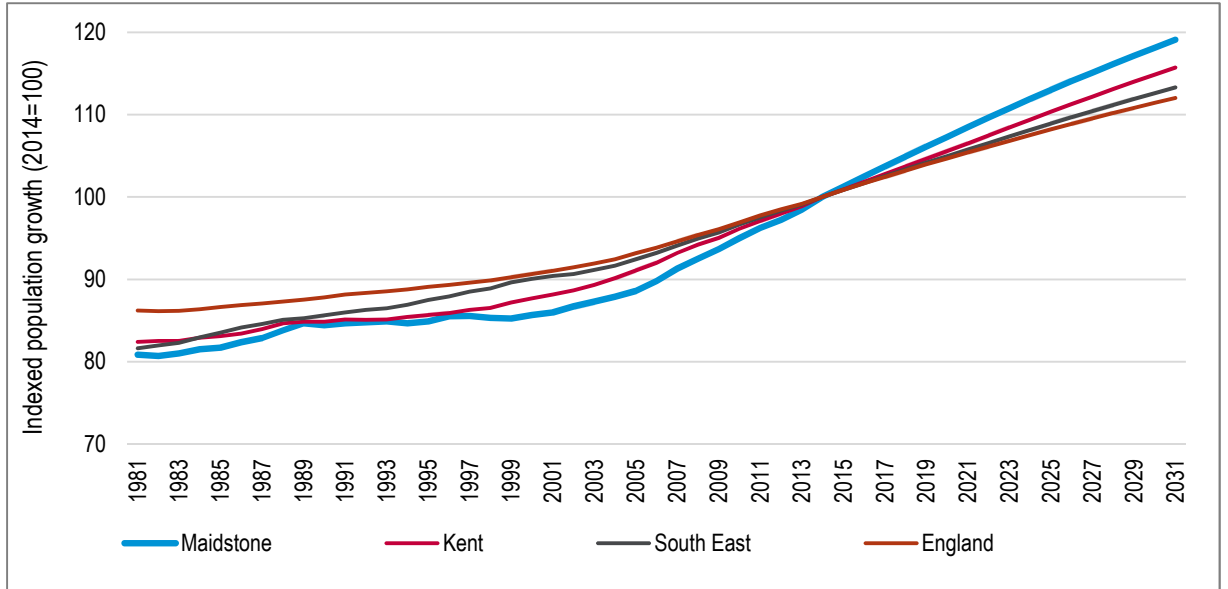
Table 2: Projected Population Growth (2011-31) – comparing projection releases

	2012-based SNPP	2014-based SNPP	Difference	% Difference
Maidstone	33,501	36,936	3,435	10%

Source: ONS

- 1.4 As the chart below shows, Maidstone has seen stronger relative population growth than across wider geographies over the period since 2006, and this stronger relative growth is projected forwards to 2031.

Figure 1: Indexed Population Growth (1981-2031)



1.5 The stronger population growth in the 2014-based SNPP is a function of stronger projected migration, particularly from other parts of the UK, but also internationally.

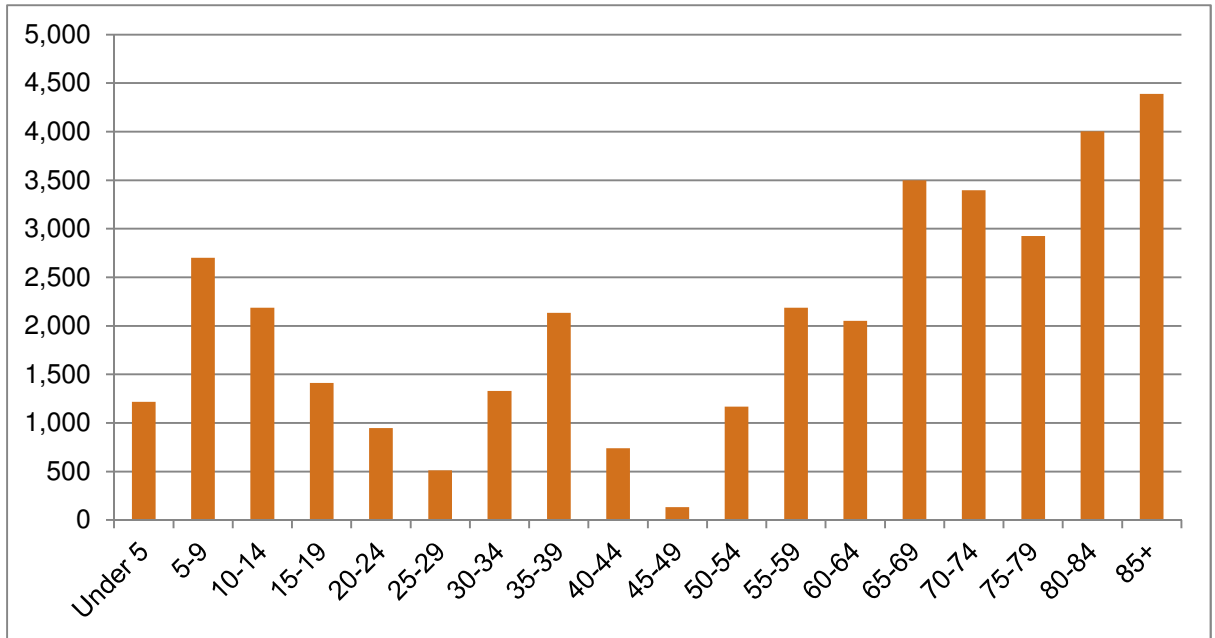
Table 3: Projected Components of population change – 2012- and 2014-based SNPP – Maidstone

	2012-based SNPP	2014-based SNPP
Natural Change	498	489
Internal Migration	780	909
International Migration	393	441
Total Change	1,671	1,839

Source: ONS

1.6 The projected change in population in different age groups in the 2014-based SNPP is shown in Figure 2. Population growth is expected across all five year age cohorts, but with the strongest growth expected in those over 65. Relative to the 2012-based SNPP, stronger growth is expected of those aged under 15; which has little impact on household growth. Weaker growth of those aged 85+, which has a modest dampening effect on overall household growth as the headship rate for this age group is relatively high.

Figure 2: Population Growth in 2014-based SNPP by 5 Year Age Group



Source: ONS

- 1.7 The CLG Household Projections applying household formation rates to the projected population growth. There is little difference between the age-specific household formation rate assumptions within the 2012- and 2014-based Household Projections.
- 1.8 Whilst the projected population growth in the 2014-based SNPP was 10% stronger, the projected household growth is 3.6% stronger. The difference reflects the impact of differences in the projected growth in different age groups, and in particularly less growth in older age groups which have high headship rates.

Table 4: Projected Household Growth 2011-31 – 2012- and 2014-based SNPP – Maidstone

	Households 2011	Households 2031	Change in households	Per annum
2012-based Projections	63,709	80,778	17,069	853
2014-based Projections	63,706	81,388	17,681	884

- 1.9 In order to estimates of the number of additional homes to which the growth in households might equate, a vacancy allowance is included in the data. For consistency with previous work, a vacancy allowance has been estimated from 2011 Census data and seeks to look

at the uplift from occupied homes that should be applied to the data. For Maidstone, the vacancy allowance is set at 3.5%.

Table 5: Projected Dwelling Need 2011-31 – 2012- and 2014-based SNPP – Maidstone

	Change in households per annum	Dwellings per annum	Dwellings 2011-31
2012-based Projections	853	883	17,667
2014-based Projections	884	915	18,302

- 1.10 In accordance with PPG the demographic projections should provide the starting point for assessing housing need. In calculating OAN it should be considered whether it is appropriate to apply an uplift to the demographic starting to support economic growth and improve affordability.
- 1.11 Maidstone’s *Economic Sensitivity Testing Report* forecasts a jobs growth of 14,400 jobs over the period from 2011 to 2031. Considering double jobbing and commuting ratios, this equates to a forecast growth of 14,277 residents in employment. The growth of working age population in the 2014-based projections exceeds the labour force required to support economic growth. Therefore there is no justification for an uplift to the demographics to support economic growth. This was also the case with the 2012-based population projections.
- 1.12 Consideration of the housing market signals and affordable housing need analysis suggests that an uplift to the demographic projections to improve affordability is appropriate. To calculate the scale of uplift, we have modelled the level of housing required to return the household formation rates of the 25-34 age group back to 2001 levels by 2031. This approach was taken in the 2015 OAN study.
- 1.13 This results in an uplift to improve affordability of 47 dwellings per annum. This equates to a 5% uplift.

Table 6: Affordability Uplift – 2012- and 2014-based SNPP – Maidstone

	Dwellings per Annum
2014-based SNPP (returning 25-34 headship rates back to 2001 levels)	962
2014-based SNPP (with no uplift)	915
Affordability Uplift	47
Affordability Uplift %	5%

- 1.14 The 2014-based population projections, with uplift to improve affordability, show a need for 962 dwellings per annum. This compares to the 2012-based projections which showed a need for 928 dwellings per annum.

Table 7: Comparison of OAN Figures – 2012- and 2014-based SNPP – Maidstone

	Dwellings per Annum	Dwellings 2011-31
2012-based SNPP with Affordability Uplift	928	18,560
2014-based SNPP with Affordability Uplift	962	19,230

- 1.15 The above analysis includes allowance for vacant homes from the 2011 Census (3.5%). However official data shows that vacancy levels within Maidstone Borough have fallen by 1 percentage point since 2011 (see CLG Table 615). The table below shows the implications of applying a lower allowance for vacant and second homes of 2.5%.

Table 8: Projected Dwelling Need 2011-31 – Updated Vacancy and Second Home Figure – Maidstone

	Household Growth	Dwelling Growth	Dwellings per Annum
Maidstone	17,681	18,123	906

- 1.16 Applying an affordability uplift similar to that above also results in an uplift of 47 dwellings. This results in a housing need figure resulting from the alternative vacant and second homes figure of 953 dwellings per annum.

Table 9: Vacancy and Second Home Sensitivity – Projected Dwelling Need 2011-31 – Maidstone

	Dwellings per Annum
2014-based SNPP with Updated Vacancy and Second Home Allowance	906
2014-based SNPP with Updated Vacancy and Second Home Allowance and Affordability Uplift	953

What the latest household growth projections mean for plan-making

22 July 2016 by Winnie Agbonlahor , [Be the First to Comment](#)

New data intended by the government to be the starting point for calculations of housing need contains substantial revisions to local household growth projections, but experts have cautioned against knee-jerk responses.



Tower Hamlets: latest projections have upgraded estimates of household growth in the East London borough

The projections, released by the Department for Communities and Local Government (DCLG) this month, predict that the number of households in England will increase from 22.7 million in 2014 to 28 million in 2039, with an average annual growth of 210,000. Overall, the new figures are largely in line with earlier forecasts. Projections published in 2015 with a starting point in 2012 predicted a rise from 22.3 million in 2012 to 27.5 million in 2037, also with an annual average household growth of 210,000.

However, there are substantial variations between the two sets of figures in some areas. For example, an analysis by Planning shows that the London Borough of Tower Hamlets is now projected to have 186,000 households in 2035, up from 169,000 in the 2012-based projections. Meanwhile, Leeds is now forecast to have 378,000 households in 2035, down from the 387,000 previously predicted (see infographic).

So what should local authorities be doing to take the latest figures into account in their housing need calculations? Matthew Spry, senior director at consultancy Nathaniel Lichfield & Partners (NLP), said that councils just beginning the process of preparing their strategic housing market assessments "should now use these figures". He added: "Those already

midway through the process will need to make a judgement on whether they need to update their evidence base."

Observers point out that national planning practice guidance (NPPG) states that, "wherever possible, local needs assessments should be informed by the latest available information". The NPPG also makes clear that "this does not automatically mean housing assessments are rendered outdated every time new projections are issued".

Richard Pestell, director at consultancy Peter Brett Associates, warns against "knee-jerk reactions" in instances where councils are facing a significant increase in household numbers compared to the previous figures. The numbers, he said, "broadly project forwards the same changes seen in the previous five or six years". This, he argues, is "quite a short period" and spikes are often due to a one-off event in that period, such as a university expansion or the completion of a major housing development. If the projected increase has risen due to such one-off events, councils should use "common sense" in considering whether evidence bases or local plans needs updating, Pestell added.

Alex Ground, a partner at law firm Russell-Cooke, said that when a plan is nearing adoption, rather than being redrafted, authorities should carry on and promise a review. This is "what the review mechanism is for", she said.

Liverpool City Council's plan is one such case. According to NLP, the rate of household growth in the city is predicted to outstrip that of other authorities in Cheshire, Greater Manchester and Merseyside, with the annual growth rate in the latest projections 361 households higher than contained in the 2012-based figures.

However, a spokesman for the council said: "In Liverpool's case, DCLG do not want the new projections to delay the local plan, even though they suggest that more homes may be needed than previously anticipated." He added that the authority will shortly be publishing a draft local plan "based on a new strategic housing market assessment which, having used the 2012-based sub-national population projections (SNPP) and household projections, may not reflect Liverpool's actual future housing needs". DCLG, he added, "want us to address the implications of the new figures though an immediate review following adoption".

In cases where current figures show an increase, commentators say that developers seeking to justify schemes on the basis of housing need are likely to see their hand strengthened. But Liverpool City Council's spokesman said: "What the figures don't tell us is what the full objectively assessed need (FOAN) for new housing is. The SNPP and the household projections are only two building blocks in the FOAN calculation. The scale of any change to the FOAN may not be proportionate to the change in the SNPP or household projections."