

Sent by email to: spatialstrategy@slough.gov.uk

11/01/2021

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Proposed Spatial Strategy for Slough

Thank you for consulting the Home Builders Federation (HBF) on the proposed spatial strategy. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Our key concern is that Slough ensures that its housing needs are met in full. As such our comments on this consultation relate to questions 9 and 10 on housing needs. In addition, we have some comments to make on:

- Testing higher levels of housing need than that suggested by the standard method;
- The plan period proposed in paragraph 17.3 of the consultation document; and
- The variety of sites allocated and in particular sufficient small sites of less than one hectare are allocated in the plan to meet the requirements of paragraph 68(a) of the National Planning Policy Framework (NPPF).

Do you think it is acceptable to plan for a shortfall of homes within the Borough boundary and promote the cross-border expansion instead?

Yes, it is evident that the Council will struggle to meet its own needs. As the Council note Slough Borough Council has a boundary that is defined closely to its urban edge and there are diminishing opportunities in the existing urban area. As such there are, inevitably, fewer opportunities available to meet housing needs wholly within Slough. Whilst this may be the case the Council will still need to ensure that it has robustly examined all development opportunities within Slough first. The areas surrounding Slough are all in the Green Belt and in line with paragraph 137 of the National Planning Policy Framework (NPPF) the Council will need to show that it has exhausted all opportunities in Slough first. However, it would appear from the evidence presented by the Council that in order to meet its needs in full land will need to be allocated for these homes in adjacent Boroughs.

But the Council must not just promote such an option it must actively plan with its neighbours to achieve this objective. In particular we are concerned that



Buckinghamshire Council (BC) have delayed preparation of their new local plan following the publication by Government of its latest Planning White Paper. It will be important for Slough to place pressure on BC to move forward with their local plan and to align with Slough timetable. Only through aligned plan preparation will it be possible for a reasonable approach to meet Slough's unmet needs in a reasonable timeframe. We recognise that this may not be a popular move with BC, but it is important that a positive and proactive approach be taken by all authorities in this area if housing needs are to be met in full.

If you think that more homes should be built in Slough to meet local needs where should it be?

As mentioned above the Council will need to carefully consider what development opportunities there are in Slough itself before seeking the support of its neighbours considering that this will require the amendment of Green Belt boundaries. However, in considering the options being put forward in question 10 the Council will need to ensure that it does not undermine the quality of life of its existing residents and ensures that there are sufficient employment uses and development opportunities to support such uses to meet the economic growth expectations for the Borough and indeed the wider economic area surrounding Slough.

It will also be important to consider the viability of delivering development in Slough given the recognised difficulties of delivering new residential development in the Borough. Such concerns could mean that higher density residential development in town centres, where costs are inevitably higher, are not viable or only viable with significantly lower policy requirements. It will, therefore, be important that in considering options for development within Slough itself that those sites are deliverable or developable at the policy costs being placed on such sites. Where there are uncertainties over such sites, we would suggest that caution be given to policy costs and delivery timescales to ensure that needs are met in full. In order to assist councils in considering the viability of development the HBF have produced a brief note outlining the approach taken by house builders when considering development viability, a copy of which is attached to this letter.

Testing higher level of housing needs higher than the standard method

The NPPF states at paragraph 60 that the local housing needs assessment is the minimum number of homes that must be delivered. Three such circumstances are set out in paragraph 2a-010 of Planning Practice Guidance (PPG), but this same paragraph recognises that there may be other circumstances than those outlined where higher growth is required. It will therefore be important that when preparing this local plan for the Council to consider these and other realistic scenarios such as the Council's objective to deliver 15,000 more jobs, that may require a higher level of housing to be delivered. This will need to form an important part of its work with neighbouring authorities in the development of the Wider Area Growth Study.

Plan period

Paragraph 17.3 of the consultation document sets out that the plan period for the local plan will be 2016 to 2036. Whilst we support the adoption of a twenty-year plan period over for the local plan the suggested time frame will not provide for the minimum 15-year timeframe on adoption as required by paragraph 11 of the NPPF. It is likely that this plan will not be adopted earlier than 2023 and as such we would recommend that the plan period will need to be extended to at least 2038 but potentially to 2039 if the Council is to ensure it has a 15-year plan period on adoption. In addition, the start date for the plan should be amended to reflect year from which the affordability ratio is taken. The application of the standard method, as clarified in paragraph 68-031 of PPG, is based on the premise that past undersupply of homes is addressed through the uplifts applied to the baseline household projections. As such councils are required to use the most recent affordability ratios within its local housing needs assessment. It is therefore logical to assume that the base date of the plan period is the year used for the affordability ratio used in the assessment of local housing needs.


Variety of sites

The HBF cannot comment on specific development sites however, we encourage the Council to work with its neighbours to ensure that any unmet needs are delivered through a variety of sites in terms of both location and size. Whilst we support the delivery of strategic sites the Council must recognise that these take time to deliver and it is important that the Council can ensure consistent delivery across the plan period. In particular it is essential that the Council is consistent with paragraph 68 of the NPPF and ensure 10% of all homes are delivered on allocated sites of less than 1 hectare. HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure with a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or else the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. This is why the Government, through the NPPF, now requires local authorities to allocate more sites of varying sizes.

Conclusion

It is inevitable that Slough BC will need to seek support in meeting its own housing needs from neighbouring areas. This should be the catalyst for comprehensive partnership arrangements with its neighbours and a positive approach to delivering what Slough needs. This will be challenging for all parties, but we look forward to seeing a positive approach to planning and should you require any further input from the housebuilding industry please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt'.

Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 07867415547