

Sent by email to: localplanconsult@threerivers.gov.uk

08/12/2023

Dear Sir/ Madam

Three Rivers Local Plan – preferred housing growth option

1. Thank you for consulting the Home Builders Federation (HBF) on the preferred option for housing growth in the Three Rivers Local Plan. 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.

Plan period

2. The Council are proposing a plan period of 2023 to 2041, which it states will ensure the plan looks forward for 15 years post adoption of the local plan in 2026, as required by paragraph 22 of the NPPF. However, this timescale for adoption is based on submission in August/ September 2025 and an examination being completed within eight months. In the HBF's experience this is a very optimistic timescale for the examination of a local plan and in particular one that does not meet development needs in full. A relatively uncontroversial plans that moves rapidly through the examination would take a minimum of 12 months between submission and receiving the inspector's report. A further two to three months is then required to go through the Council's own committee processes in order to adopt the local plan. Therefore, as a minimum we would expect that the period between submission and adoption would be 15 months. However, in order to ensure that the plan is consistent with paragraph 22 of the NPPF the Council should allow for at least 2 years between submission and adoption. This would mean that the plan is most likely to be adopted part

way through 2027 the HBF would recommend that the plan period is extended to 2043 to ensure that it looks ahead for a minimum of 15 years on adoption.

Housing growth

Q1 – Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved.

3. No. The Council outline that using the standard method the local housing needs assessment result in an annual housing need of 637 homes. Over the proposed plan period this results in a total need of 11,466 homes. The HBF agrees with the council's assessment of annual housing needs but, as set out above, the HBF consider the council's assessment as to when the plan will be adopted to be optimistic. In order to ensure the soundness of the local plan the end date for the plan should be extend to 2043 and would result in a total housing need of 12,740.
4. The Council states in paragraph 2.12 that it considers the housing target calculated by Government to be too high and is concerned that it is based on out of date data and does not represent the actual need of the Borough. The Council go on to acknowledge that the exceptional circumstances for using an alternative method have not been met and the housing needs arrived at using the standard method should be the starting point for assessing housing needs.
5. Whilst the HBF would agree that there are no exceptional circumstances to support a lower housing figure we are concerned that the Council continues to consider it to be an overestimate of what is needed. This belief appears to completely ignore the fact that the Country is in a housing crisis due to the lack of development that has occurred nationally but most acutely in the south of the country. This is a result of local authorities failing to recognise their responsibility to plan strategically to meet the development needs of their area. This has led to the situation where a little over 2,000 homes have been delivered in Three Rivers between 2012/13 and 2021/22. This is an annual rate of just 200 homes a year – well below both the standard method and prior to this, its own assessment of housing need in the 2016 SHMA of 514 dwelling per annum (dpa).

6. In preparing this local plan the Council need to attach significant weight to the housing crisis facing both residents of Three Rivers and the country as a whole. This crisis is the primary reason why the Government has continued to require the application of the standard method and its use of the 2014 base household projections which reflect the scale of the backlog in housing supply. Only through a significant uplift in housing delivery across the country, and in particular in the south-east of England, will there be any hope of stabilising house prices over the long term and ensure that there are enough homes to meet everyone's needs.
7. It is important to recognise that the shortfall of housing is a long term structural issue, there is just not enough homes in relation to the size of the country's population. The issue of population size and the size of the housing stock is considered in recent report by the HBF which compares the UK housing market with other European countries. What is notable from this research, is that England has far fewer dwellings relative to its population than other developed nations. For example, Italy and France have around 590 homes per thousand inhabitants compared to just 434 in England, which is also well below the OECD average of 487.
8. This dearth of properties makes England one of the most difficult places in the developed world to find a home, with the rate of available properties per member of the population at less than 1%, the lowest rate of all OECD countries. The relatively low number of homes for the size of population will impact on the cost of housing. The research found, not only that housing is very unaffordable in the UK but that other similar European nations, for example Belgium and France, have seen incomes better keep pace with house prices and in some cases, such as Finland the have fallen slightly as a proportion of income. Whilst this is national data it provides stark evidence as to the shortage of housing across the country and the need for all areas to boost supply if affordability is to improve.
9. The outcomes of this shortage of homes will mean affordability continuing to worsen, more people living in overcrowded/ substandard accommodation or staying with parents far longer than previous generations due to the lack of available and reasonably priced housing. If this issue is to be addressed the Country needs Councils such as Three Rivers to plan for levels of housing that are well above what was delivered in the past and above current population projections. If the Council, and indeed all councils, do not take on its strategic responsibilities with regard to significantly increasing the supply of land for new housing then the issues outlined above will never be addressed.

10. When taken together the impacts on not meeting housing needs amount to the exceptional circumstances to release further land from the Green Belt to meet its housing needs. To ignore these is a failure of its responsibility to plan strategically to address the housing and as a minimum the Council must prepare a plan that would support the delivery of 637 dpa.

Growth options

Question 3: Do you agree that the Council's preferred 'Low Growth and Green Belt Restraint' option is the best growth strategy for the District?

11. No.
12. Instead of meeting housing needs in full the Council's proposed stance is to plan for the delivery of an additional 4,852 new between 2023 and 2041, an average of just 270 dpa. This is a shortfall each year of 367 homes against the local housing needs assessment. The justification for not meeting needs would appear to be based solely on the need to limit the loss of Green Belt land only to those sites where harm was considered to be either low or moderate.
13. Whilst the HBF recognises that the NPPF establishes that where constraints, such as Green Belt, exist this may be a reason for not meeting housing needs. However, there is also an expectation that these housing needs will be met elsewhere. We could find no evidence as to where these housing needs will be provided, and the assumption must be that they will remain unmet and as such exacerbate negative impacts arising from not meeting needs in full. Therefore, in making its decision to restrict development in order to protect Green Belt the Council are in effect prioritising protection of the Green Belt over other important social and economic benefits that accrue from the option of meeting housing needs in full. These benefits are not unknown to the Council with the Sustainability Appraisal Working Note summarising in table 3.1 the benefits of meeting needs in full compared to both options that fail to meet housing needs. These include improvements in the health of the population, increased economic vitality and the improved viability of the local services.
14. In addition, the Council do not appear to have taken into account paragraph 142 of the NPPF which states that LPAs "... *must take into account the need to promote sustainable patterns of development ...*". However, this is not the approach taken by the Council.

Instead, the Council made the decision to remove sites in Green Belt parcels where it was considered boundary amendments would cause a moderate to high harm or more. No consideration appears to have been made as to whether the release of land in these parcels would enable the Council to promote strategic patterns of development and as such justify further amendments. If the Council continues to base its strategy purely on the basis of protecting Green Belt rather than a wider consideration of the need to promote sustainable development, then the plan cannot be considered to be consistent with national policy and would be unsound.

Approach to Green Belt Review and site assessment

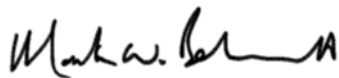
15. The HBF have concerns regarding the Green Belt Review and the scale of the parcels assessed and how this relates to the actual site being promoted. Where a site is smaller than the parcel assessed then the impact of that site on the purposes of the Green Belt are likely to be different, especially when mitigation measures are considered. The Green Belt Review should act as a guide as to the potential impact but should not be used to dismiss potential development sites without a more detailed granular assessment of the sites promoted in that parcel and the particular impact it might have on the purposes of the Green Belt. The Council should therefore ensure that no site that forms part of a parcel has been dismissed solely on the basis of the Green Belt assessment. Such sites must be assessed on the potential harm of that site and whether mitigation measures could be used to minimise its impact on the purposes of Green Belt in order for the site to be allocated in the local plan.

Conclusion

16. The Council must not ignore the benefits of housing or the people who will be unable to access the home they need in Three Rivers due to a failure to plan for sufficient growth. The positive impacts of further green belt releases must be properly articulated by the Council and weighed against the relative harm this might have on the aims and purposes of the Metropolitan Green Belt, and whether any of the identified impacts can be mitigated. The HBF consider that with proper planning the Council could meet needs with minimal impact on both the aims and purposes of the Green Belt.

17. It is also important to recognise that support for house building within the community is high. Recent research commissioned by the HBF¹ shows that support for building more housing is higher than is often thought. When asked whether they were supportive of more house building 80% of respondents were supportive or not averse to more homes being built in their local areas with only 20% opposed to it. The report also highlights the fact that overcoming the housing crisis is vital in tackling intergenerational unfairness and inequality with 71% of respondents feeling that that housing crisis was making the country less equal and more divided. Local Planning Authorities must recognise that whilst seeking to plan for fewer homes than are needed may seem popular this is not necessarily the case and that it is more likely that the vocal minority are being listened to rather than those most affected by the lack of housing being provided.

Yours faithfully



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¹ Housing the Nation, HBF (2023) <https://www.hbf.co.uk/news/housing-the-nation/>