

Sent by email to: trldf@threeivers.gov.uk

08/09/2017

Dear Sir/ Madam

Response by the House Builders Federation to the Three Rivers Issues and Options Consultation

Thank you for consulting the Home Builders Federation (HBF) on the Issues and Options consultation. 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.

Duty to Co-operate

We are pleased to see that the Council has prepared a SHMA with its neighbouring authorities it will be important to ensure that this translates into effective co-operation in the delivery of new housing. This should include joint consideration as to how the needs of the HMA will be met and agreement as to how any unmet need, should this arise, be apportioned. We would also suggest that the Council and its partners in the HMA engage with the GLA and those London authorities to the south of the HMA given the clear linkages in terms of both migration and commuting. There is a need for greater co-operation with London on these matters given the potential shortfall in housing delivery being experienced in the Capital at present with supply expectations of 42,000 dwellings per annum (dpa) being significantly below the Mayor's lowest assessment of need at 49,000 dpa. However, even 42,000 dpa may be unachievable given the latest monitoring report published by the GLA indicates delivery of conventional housing (self-contained flats and houses) for the 2015/16 period as being 32,919.

Housing needs

We have not been able to go into the evidence in depth with regard to this consultation, however, we do have some concerns with regard to the Council's approach to assessing housing need that will need to be addressed before moving forward. Firstly, the Council should consider the most up to date evidence with regard to household projections. The current study is based on the 2012 based data and the Council and, as required by PPG should consider the most up to date projections which are now the 2014 based projections published in 2016.

Secondly, we would disagree with the 3% uplift that has been considered appropriate to take account of market signals. The Council has significant affordability problems with the Borough's rising house prices being over 10 times resident earnings, a position that the SHMA acknowledges has worsened significantly in recent years. Other areas experiencing similar market signals have considered uplifts in excess of 15% to be appropriate. For example the SHMA for Braintree and Chelmsford in Essex, which have similar market signals, identified respective uplifts of 15% and 20% uplifts. Given that PPG is clear that where affordability constraints are worse this should be reflected in the uplift. As such we consider 3% to be inadequate and unjustified on the basis of the evidence set out in the SHMA.

We would therefore suggest that the Council deliver substantially above its demographic starting point in line with option 3 which would deliver 617 dwellings per annum over the next 15 years. Such a requirement would be more in line with the evidence presented by the Council and ensure the Council is better able to justify its plan at examination.

Housing Growth Options

The Council have identified a range of different delivery options but it is likely that the Council will need to consider a mixture of these in order to meet housing needs in the most sustainable way. This will require the Council to undertake a Green Belt boundary review and we would encourage the Council to undertake such a review if it has not done so already. It will also be important for the Council to allocate a range of sites both in terms of location and size and not rely solely on major strategic allocations. This will not only ensure a sustainable approach to new development but also enable a consistent supply of land to support housing delivery and the five year housing land supply.

Affordable housing

The Council should not be considering possible options as to the delivery of affordable housing until it has the relevant viability evidence. This evidence must be the basis for any policy and will be essential if the Council is to be able to justify the approach it takes. The only comments that we can make at this stage is that the Council prepares a policy that does not seek contributions below the 10 unit threshold set out in PPG as this would be unsound due its inconsistency with national policy and that the policy must state that it will only be implemented where viable.

I trust that these comments are helpful in taking forward the Local Plan and if you have any comments please do not hesitate to contact me. Please could you also add me to your consultation database in order to receive future updates on the progress of the Local Plan and any future consultations.

Yours faithfully

Mark Behrendt

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