

Sent by email to: planning.policy@sevenoaks.gov.uk

03/10/2017

Dear Sir/ Madam

Response by the House Builders Federation to the Sevenoaks Local Plan Issues and Options consultation

Thank you for consulting the Home Builders Federation (HBF) on this 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.

Overview of housing needs

The outcomes of the Government's consultation on the standard methodology as set out in "Planning for the right homes in the right places" will clearly have a major impact on Sevenoaks and its neighbouring authorities. If the methodology remains unaltered those authorities included in the West Kent HMA will each see a significant increase in housing needs. We recognise that at present only limited weight can be given to the standard methodology, but we do consider that due to the worsening affordability across this area should be a more significant response to market signals than is currently the case that would deliver a needs assessment more in line with the outcomes of the standard methodology. Sevenoaks currently has a lower quartile affordability ratio of 13.18 which has risen from 10.17 in 2007 and average housing prices rising by £85,000 in the same period. These signals indicate a market that has not delivered the required housing that is needed in the Borough. In Canterbury, Mid Sussex and Waverley for example similar market signals similar have seen inspectors agree uplifts of 20%.

If, like these similar authorities the Council were to apply a 20% uplift after considering market signals they would have assessed their housing needs as being 692 dpa, similar to the Government's assessment of 698 dpa. As mentioned above only limited weight can be given to the standard methodology but it provides a clear indication of the direction of travel and the degree to which Government considers Council's should uplift baseline needs where homes are least affordable. We would therefore suggest that the Council looks to plan for housing needs in the region of 700 dpa. This level would provide an appropriate adjustment for market signals as well as being sufficient to support the economic growth expectations of the Council.

However, we are concerned that the approach being taken by the Council is one that will seek to limit its ability to meet housing needs rather than a positive approach that could yield significant increases in housing delivery as required by the National Planning Policy Framework. The Council places significant importance on the fact that it is 93% Green Belt. However, given that there is such a large amount of Green Belt the Council could take the approach that amending boundaries would could have significantly less impact than those that have larger urban areas and less Green Belt. We would therefore suggest that the Council carefully examines all the available land within its Borough, including sites in the Green Belt, and consider its potential to provide sustainable development. The Council should not seek out further constraints when considering national policy, such as those relating to exceptional circumstances. Such an approach will inevitably restrict its ability to meet its considerable levels of housing needs and perpetuate under delivery in the past that has been a key factor in the unaffordability of homes in the Borough.

Strategic Approach to housing delivery

The Council should not seek to restrict itself to a singular approach when considering how to meet its development needs. Priority should be given to meeting development needs in the most sustainable way, whilst also being consistent with national policy. As such we consider a combination approach to be reasonable but would question the Council's approach to a "Combination" strategy. It is evident from the consultation document that the Council are not certain that their preferred approach will meet the housing needs of the Borough in a sustainable manner. Whether the Council will achieve this objective will depend on:

- the scope of the 'Combination' approach the Council have identified as its preferred strategy
- the approach taken when considering exceptional circumstances
- the need to work with neighbouring authorities in order to meet the needs of the housing market area (HMA).

Firstly, it is not clear whether the scope of the Council's preferred approach includes the potential to deliver a new settlement or expand transport hubs into the surrounding Green Belt. There could well be exceptional circumstances for amendments to Green Belt boundaries supporting such options and they should form part of the scope for any combination approach. This would mean that new options or previously discarded options, such as the Swanley Garden Village, should be considered as part of this combination approach. A broader scope to the 'Combination' approach preferred by the Council would also increase its potential to meet not only its own housing needs but any unmet needs arising from within the HMA.

Secondly, the Council is placing unnecessary restrictions on itself when it comes to the consideration of exceptional circumstances. Paragraph 6.18 outlines that exceptional circumstances will exist where development may achieve:

- The reuse of brownfield land
- Ensures the delivery of new and needed key infrastructure
- Is needed to achieve regeneration and

- Helps to achieve significant compensatory improvements in the Green Belt

We would disagree with this assessment of exceptional circumstances and are surprised that the need for new housing, especially set against the considerable concerns regarding affordability, do not feature as being an exceptional circumstance. The Government in its housing white paper set out the importance of housing needs when considering exceptional circumstances and the case of Calverton Parish Council v Nottingham City Council, Broxtowe and Gedling Borough Council [2015] EWHC 1078 also highlights the importance of considering housing needs and supply against the nature of the Green Belt when assessing whether exceptional circumstances are present. We would therefore suggest that the Council undertakes a more fine-grained approach to its Green Belt assessment to understand the impact of smaller parcels of land on the purposes of Green Belt. Through such a study the Council would then have a far better understanding of the impacts of development on the Green Belt and be able to consider exceptional circumstances both strategically and on a site by site basis.

Whilst the Council have not stated the Housing Market Area (HMA) within which it sits within the consultation document the SHMA it prepared with Tunbridge Wells outlines that the two authorities sit within a West Kent HMA. This HMA includes areas outside of the two authorities, such as Tonbridge, and as such the SHMA recommends that the administrative boundaries of Sevenoaks and Tunbridge Wells represents a “best fit” HMA due to the constraints on data collection of a more fine-grained approach. Whilst there are benefits in such an approach this does not absolve the Council’s from considering the housing needs arising from its neighbouring areas. In particular we are concerned that many of these areas may struggle to meet housing needs and that a strong collective approach is required to address housing needs for the sub region.

We would therefore consider it essential for the future soundness of the Local Plan for the Council to increase its co-operation on housing issues beyond a shared approach to data collection to one of delivery. For example, there are real opportunities for joint working with Tunbridge Wells, and potentially Tonbridge and Malling, who are at a similar stages of plan preparation. A joint plan or at the very least a shared Land Availability Assessment would allow for a more strategic consideration of needs across the West Kent HMA and show real co-operation in seeking to meet housing needs.

We would also suggest that consideration should be given to working with those London authorities bordering Sevenoaks, in particular Bromley whose housing target in the London Plan is significantly lower than identified needs. The Council must consider the potential strategic solutions to meeting unmet needs that are likely to arise due to London being unable to meet its current level of housing needs. We are therefore surprised that Sevenoaks has not raised any concerns in their submission to the Bromley Local Plan which will deliver just 641 dwellings per year (dpa) against their assessment of need which is between 1,150 dpa and 1,488 dpa. It is unlikely that this level of unmet need will be absorbed by the rest of London considering projected delivery for the Capital is 42,000 dpa to meet published needs of 49,000 dpa. This level of unmet needs is likely to place further pressure on Borough’s such as Sevenoaks and as such requires both authorities, and other across this sub region, to co-operate if they are to meet housing needs in full.

Affordable Housing

Until viability assessments have been undertaken on the impact of the Plan as a whole on development viability it is not possible to speculate as to the level of affordable housing the Council might require on development locally. However, we are concerned that the approach taken by the Council to limit development will not deliver the levels of affordable homes required by the Council. Developing brownfield sites at higher densities may not deliver the necessary margins to allow for the delivery of 40% affordable homes on site. The Council must therefore consider in its approach to development the potential positive benefits of delivering more affordable housing through the release of larger greenfield sites alongside its brownfield allocations. This would reduce the burden on the house building industry, reduce challenges regarding viability and bring forward more affordable homes across a wider variety of sites.

We would not support the Council's suggestion that it requires financial contributions on sites of 10 or fewer homes. This would not be consistent with national policy and would be unsound on that basis. It is important to remember that the Government introduced this threshold as it considered the impact of contributions on small sites to be an undue burden on smaller developers. This is a much wider concern than viability and recognises that additional financial burdens, such as affordable housing contributions, have a much greater impact on small house builders who largely develop smaller sites. It is also a policy that seeks to support this particular sector of the house building industry that contributes significantly to the range of new homes that come forward across the Country.

Older peoples housing

In meeting the housing needs of older people, we would suggest the Council does not consider one approach as being sufficient to meet needs. The needs of older people are varied and as such a breadth of sites should be considered and allocated to meet their needs. It should not be assumed that there is a one size fits all model that will meet the needs of all older people.

Employment land

Whilst we recognise the need to plan for employment uses the Council should, in line with paragraph 22 of the NPPF, not seek to maintain existing allocations or designations where they no longer meet the needs of that market. Such allocations can mean that land that is perfectly suitable for other developments remains unused due to long standing but obsolete development expectations. For similar reasons we would not support the use of a development hierarchy that seeks to unnecessarily limit options for house building industry by giving other uses priority where an existing is no longer suitable. Given that the Country, and the wider South East in particular is facing a housing crisis such prioritisation is not considered to be justified.

Health Impact Assessments

We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for a development to undertake a Health Impact Assessment (HIA) to demonstrate how they have mitigated any potential negative effects on health is unnecessary and an additional burden on applicants. The PPG sets out that HIAs “*may be a useful tool to use where there is expected to be significant impacts*” but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Where a development is in line with policies in the local plan an HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA.

We hope these comments are of assistance in taking the plan forward to the next stage of plan preparation. I would also like to be placed on future mailing lists for updates on the preparation of the local plan and future consultations. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

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