

Sent by email to: localplan@tandridge.gov.uk

09/10/2017

Dear Sir/ Madam

Response by the House Builders Federation to the Garden Villages consultation

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

As we mentioned in our response to the previous consultation we cannot make any comments as to the potential location of new development and the relative merits or disadvantages of different sites. However, we welcome the decision by the Council to consider alternative approaches to increasing delivery in the Borough as we had suggested in our previous response. But we must continue to raise concerns regarding the evidence base supporting the preferred strategy for the local plan that was published in March and forms the basis for this latest consultation. Earlier this year the Council published a Strategic Housing Market Assessment that was commissioned by the Council but which was then not used by the Council. Instead the Council based the preparation of the local plan on the SHMA commissioned from Neil MacDonald Associates. Whilst the ARC4 report is clearly unfinished it sets out that that Borough's Objectively Assessed Housing Needs is 700 dwellings per annum (dpa). This is significantly different to the 470 dpa that the Council is currently planning for and much closer to the 645 dpa that the Government's proposed standard methodology calculates as being Tandridge's OAN.

It would appear from this situation that the Council looked to commission evidence on the SHMA that would constrain their housing needs rather than take an objective view as to what those needs are. In particular the ARC4 study supports our observations on employment needs and the need for the Council to consider these when setting their housing requirement. To dismiss the impacts of employment growth is not consistent with Planning Practice Guidance and to rely on other areas to support such growth not supported by any evidence related to the Duty to Co-operate.

There are also a number of Local Plans that have now been examined in the South East that give a reasonable indication of the degree to which market signals should be taken into account. Waverley, Canterbury and Mid Sussex have all now been examined and the inspector has agreed uplifts of 20% on the basis of the market signals in the

area which are similar to those present in Tandridge. Most recently Waverley was examined with the Inspector agreeing that an uplift was required based on indicators such as an average lower quartile house price of £260,000 and a lower quartile affordability ratio of 12.17. The SHMA identifies Tandridge as having the worst affordability of its neighbouring Boroughs. Median house price 375,000 in 2015, almost double the price in 2001 of £160,000 with lower quartile affordability ratios of over 14. Given that these indicators and the fact that they are significantly worse than the national and regional averages would suggest that a more thorough consideration of market signals is required.

We would therefore like to reiterate our conclusions from our response to your earlier consultation that the SHMA has not sufficiently considered market signals and the OAN of 470 dpa is insufficient and not appropriate basis on which to prepare a local plan. The emerging approach from Government in the form of the standard methodology would also support this position and we would strongly urge the Council to consider developing the next iteration of its local plan on the basis of a housing target in the region of 650 dpa.

Yours faithfully

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