

Sent by email to: LPU@wokingham.gov.uk

22/02/2019

Dear Sir/ Madam

Response by the Home Builders Federation to the Wokingham Local Plan Update consultation

Thank you for consulting the Home Builders Federation (HBF) on the update of the Wokingham 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.

It is important that local planning authorities maintain up to date local plans and it will be important for Wokingham Borough Council to progress quickly to submission and adoption of a new local plan that meets housing needs in full. We would welcome the opportunity to discuss the Council's progress with the plan and the approach taken with regard to improving the supply of land for housing development. Outlined below are some general comments with regard to the preparation of the plan and the key aspects we consider are necessary to ensure it can be found sound.

Meeting housing needs

The Council must prepare a plan that meet needs in full. When considering its approach to meeting housing needs it is essential that the Council looks to allocate a range of sites in terms of both size and location. Whilst this will inevitably include new communities and additional strategic urban extensions it should also include small and medium sized sites that will be able to deliver homes earlier in the plan period. Too often local plans are prepared that are overly reliant on strategic allocations to meet the majority of their housing needs. Whilst we are supportive of strategic allocations, they also mean delivery comes forward much later in the plan period resulting in a continued worsening of affordability within the area. It is therefore essential that the Council looks to allocate sufficient small and medium sized sites that will meet needs without the need for a stepped trajectory early in the plan period, with strategic allocations delivering later on and potentially into the next plan period. It is also important that the Council avoids concentrating development in one area and seeks to ensure delivery across communities. Such an approach ensures that the Council does not saturate a specific market potentially slowing delivery.



The Council will also need to work with its neighbouring authorities to consider whether there is an unmet need in those areas that could be delivered in Wokingham. In particular the Council will need to consider how it can address the unmet needs arising within Reading. We noted in our representations to Reading's Local Plan that they had a shortfall of 600 homes, and it will be important that the Councils work together to consider how any shortfall will be addressed. The Council should also consider whether it can seek to meet unmet needs arising within London. Whilst not a neighbouring area the commuting and migration links between these areas suggests that any unmet needs within the capital could be effectively delivered within Wokingham. Given that the Mayor has identified a shortfall in delivery of 10,000 homes over the next ten years the Council must consider increasing its requirements to address some of the unmet needs arising from the capital.

Affordable housing

The 2018 National Planning Policy Framework and its associated guidance places far more emphasis on the need to ensure development viability at the plan making stage and ensuring local plan policies are realistic. The Government's aim is to reduce the number of applications that do not meet policy requirements, in particular the requirements for affordable housing. It is essential that the Council works with the development industry in their area to fully understand the costs of development. This is a key part of the viability assessment process as set out in PPG and ensures that inputs are realistic. It is also vital that the viability assessment forms part of the early stages of plan preparation. This work should inform the preparation of the policies and not be undertaken to justify a position already taken by the Council.

The Council must not adopt an aspirational target for affordable housing, and indeed other policies, that pushes development to the margins of viability. Without the potential flexibility to negotiate at the application stage there is the considerable risk that the cost of local plan policy requirements will see developments stall. We would therefore suggest that the Council takes a cautious approach to its affordable housing requirement whilst increasing the supply of land for housing to better meet the needs for affordable homes. Such an approach would also ensure that the plan meets the requirement for paragraph 11 of the NPPF that plans are sufficiently flexible to adapt to rapid change.

Development density

There are some sites and areas where higher densities can be sustained, and we would welcome greater flexibility to deliver higher density development where this is possible. However, it is important that the Council does not seek to use significantly higher densities in its urban areas as a means to avoid the allocation of green field sites. Firstly, higher density flattened developments are costlier to develop - build costs are more significant and the existing use value on previously developed land will be far higher. These additional costs will mean that other policy requirements will need to be lower, reducing the Council's ability to deliver affordable housing on such sites.

Secondly, a focus on higher densities will reduce the mix of homes coming forward with largely flatted developments coming forward on such sites. As such we would recommend that higher densities are focussed in the most sustainable locations near transportation hubs and existing services. However, the Council would also need to ensure it allows for flexibility with regard to parking requirements, housing mix and affordable housing to ensure such development remains viable.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Should you require any further clarification on the issues raised in this response please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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