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The Right Hon Sajid Javid MP
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6 November 2017

Dear Sajid Javid MP

Planning for the right homes in the right places: consultation proposals

Thank you for consulting the Council in respect of the important issues raised by housing numbers, not only in Swale, but in the Country as a whole.

By common consent, there is the view that the housing market in this country is broken, with many families struggling to save to afford to buy a home in their local area.

All levels of government have a role in responding to this crisis, and we at Swale Borough Council have taken our responsibility very seriously. We have worked hard, taking the difficult decisions that we must, to make sure the right kinds of homes for our communities can be built.

As a result, after passionate debate and discussion, the Swale Borough Local Plan was adopted as recently as June 2017. It is our way of making clear to developers, guided by our local communities, the most appropriate places to build and when.

In the early stages of our Local Plan preparation, we set a housing target of 540 dpa based on what we believed could be delivered by the market in Swale, however, our objectively assessed housing need was accepted by the Examination Inspector at 776 dpa – a level well beyond anything we had seen delivered before. Despite our arguments that it was unrealistic, the Inspector concluded that the Council's approach was a pessimistic one. As a result, the Council subsequently made the difficult choices that needed to be made, because the risk of having no local plan at all was even worse.

But, as we argued from the start, developers are failing to bring forward and build out the much-needed new homes quickly enough, so now the increased targets aren't being met. Furthermore, as a result of the shortfalls accrued, the punitive measures within the NPPF, together with those potentially signalled by the housing delivery test, now mean that the targets required to maintain a five-year supply are even higher and, in turn, are now even further beyond reach. The result is that within weeks of the local plan being adopted, local communities are being challenged by ad-hoc and speculative greenfield planning applications for housing.

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It was therefore with hope that the Council awaited the Government's response to these issues. So what was its response? - increase the target again. Sadly, the Council can reach no other conclusion that overall, the consultation paper reads like a workman blaming his tools for a bad job; the Government's misdiagnosis of the problem would be absurd, if it was not so troubling.

The Council entirely rejects the consultation proposes which represent a one-size-fits-all housing target imposed on local authorities, which would take the numbers of homes expected to be built from what could charitably be described as 'optimistic', into the realms of fantasy. Indeed, as a result, all Council's across Kent will see their five-year supplies removed at a stroke, a number of who have had local plan only adopted in 2017.

This Council's response is not nimbyism, neither is it shirking its part in the delivery of much needed homes. However, the Government continues to believe that it is the supply of land for homes and the planning process that is at fault. Simply put, the Government needs to recognise that developers are not fulfilling their promises, but instead it seems to want to continue to reward them by letting them build wherever they like, irrespective of local concerns about the impact on local people, and their access to service and facilities.

How can the consultation paper claim that the proposed approach will give communities greater control of where much-needed homes should be built? There is nothing in these proposals to support that statement. Indeed, the opposite seems likely to be true since the incentive it will create for speculative development on sites not identified in plans will limit community engagement to the specifics of proposals, and planning by appeal, rather than positively shaping what happens through local or neighbourhood plans.

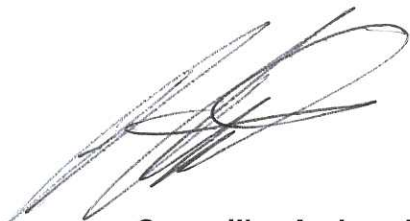
The Government's view is that where there are issues with not meeting increased targets these can be addressed via Statements of Common Ground. However, in the South-East, this is little more than a pipe dream. Not only do the proposals completely undermine the Government's industrial strategy for the north and midlands, but ignores the elephants in the room – namely the unmet need arising from London and the capacity of the authorities around the Capital to address it on top of their own inflated requirements.

The Government must recognise that this is not just about house building, but about place making, building communities and the provision of supporting physical and social infrastructure to serve these new and expanded communities. In the South East, due primarily to the impact of new housing on infrastructure and services (including roads, doctors (and surgeries), hospitals and schools and utilities), there are very strong public reactions against planning and developers. As it stands, this current consultation will cause the public to question the way in which the Government plans and also whether it is committed toward localism and communities.

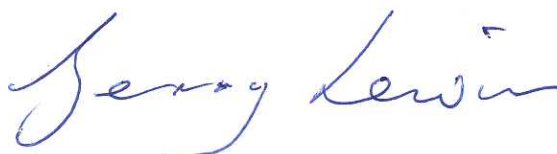
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Attached to this letter are the Council's detailed comments to the consultation questions set. In short, the Council is urging the Government to think again, and open their eyes to the real causes of the problems we face in Swale and the wider South East. We need a more radical and constructive approach. We need Government and developers to commit to working with us to address issues around housing, infrastructure and economic growth. The Government needs to play its part on providing for the strategic infrastructure and settlement strategy at the national and regional level which reflects the potential for maximising the economic development of the North and Midlands whilst meeting housing needs in the south. We need an approach where the voices of local communities, who understand both the limitations, and potential of the area can be heard.

Yours sincerely



Councillor Andrew Bowles
Council Leader



Councillor Gerry Lewin
Deputy Leader &
Cabinet Member for Planning Services

cc Gordon Henderson MP
Helen Whately MP