



Stepping onto the property ladder consultation

Tonbridge & Malling Borough Council response

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Please find below the officer-level response from Tonbridge & Malling Borough Council.

Q1. Do you agree in principle with the idea of a new national Starter Homes exception site planning policy to deliver more new low cost homes for first time buyers?

A1. No. An exception site policy should just be that, i.e. an exception to policy. Looking for and identifying opportunities for starter homes is, in effect, identifying a new policy. After all, Local Plans do not identify specific sites as rural exception sites for affordable housing in rural areas.

It is not clear how local planning authorities are expected to reconcile this policy with the proposals that feature in the current consultation from the DCLG on '**Building more homes on brownfield land**'. This other consultation is focussed on similar areas and shares many requirements yet it makes no reference to the Starter Homes exception site policy. Given the threat of special measures if a local authority does not have in place Local Development Orders on brownfield land that meets a set of criteria, how can local planning authorities be expected to resist market housing on these sites once the principle of suitability has been established and in light of objectively assessed need, especially if the developer proves that discounting the market value will put at risk deliverability?

The social sustainability credentials of the policy are also questioned. Exempting such sites from affordable housing contributions will only exacerbate the current problem of delivering much needed social rented housing. It is unclear if such sites would be exempt from paying contributions to other pieces of community infrastructure including schools and healthcare. If we are to interpret the CIL exemption as meaning 'yes' to this question, the consequence is that existing infrastructure will be put under more strain and may not be able to support present and future needs of the people buying the properties, eg school places, GP surgeries etc.

Finally, it is unclear what size of sites this policy would apply to, i.e development potential for 1-2 units, 5 units, 10 units 10+ units? This is an important issue, not

least because it will define the magnitude of the problems highlighted in the previous paragraph.

Q2. Do you agree that the Starter Homes exception site policy should focus solely on commercial and industrial brownfield land which has not been identified for housing?

A2. No. If the objective of the policy is to ensure a supply of starter homes, then it should be applicable to larger market housing sites as well, i.e. a requirement for a proportion of the total number of units to be starter homes (20% discount of normal market values).

Q3. Do you agree that the types of land most suitable for starter homes will be under-utilised or non-viable sites currently (or formerly) in commercial or industrial use?

A3. Not necessarily (see answer to question 2).

Q4. Do you consider it necessary to avoid Starter Homes developments in isolated locations, or where there would be conflicts with key protections in the National Planning Policy Frameworks?

A4. Starter Homes development should be treated the same as any other development in isolated locations; they should be assessed against the requirements of the Development Plan, the National Planning Policy Framework and the National Planning Practice Guidance. There is no justification for such developments to be considered as an exception.

Q5. Do you agree that the Starter Homes exception site policy should allow at the planning authority's discretion a small proportion of market homes to be included when they are necessary for the financial viability of the Starter Homes site?

A5. No. If the principle of the suitability of a site for housing is established and market housing is considered acceptable (as suggested by the question), it is going to be very difficult for local planning authorities to resist applications for full market housing, given local evidence of objectively assessed needs and the threat of special measures if Local Development Orders are not in place (see answer to question 1, above). It is unreasonable to make comparisons with the flexibility allowed in the implementation of the rural exception sites policy because this is responding to specific local evidence of need and it is applicable at locations that are outside the confines of settlements, not within large urban areas.

Q6. Do you agree starter homes secured through the Starter Homes exception site policy should only be offered for sale or occupation to young first time buyers?

A6. In principle yes but it is questionable whether a specific age (40) should be stipulated. Without the support of evidence, this appears to be an arbitrary number to pick, which is unfair. I do not see why those people who may be in their early 40s who have yet to be in a financial position to afford buying a home should be discriminated against. Given the title of the Policy is 'Starter Homes Exception' the qualifying criteria should not focus on an upper age limit but the fact that the buyers are first time buyers.

Q7. Do you think there are sufficient existing mechanisms in place to police this policy?

A7. No comment.

Q8. What is the most appropriate length for a restriction on the sale of a starter home at open market value? How should the sliding scale be set?

A8. If the objective of the Policy is to deliver starter homes for first time buyers then this opportunity should be made available for as long as possible. It is questionable whether the lifting of the restriction should commence after only five years because this could result in the stock being lost to full market housing within a relatively short period of time which would undermine the policy and allow for the problem of people unable to get their foot on the housing ladder to resurface. As a minimum, the homes should be available as starter homes, i.e 20% discount, for at least 10 years. I see no justification for allowing the first incumbents to be in the position to unfairly profiteer within a short period, i.e. between 5 and 10 years, of moving into the property.

Q9. Do you agree that guidance should make clear it is inappropriate for Starter Homes exception site projects to be subject to section 106 contributions for affordable housing and tariffs?

A9. No. As highlighted in para. 26 of the consultation, the Starter Homes product is not a solution for those members of the community in greatest need of housing. As such it is considered that it would be inappropriate to exempt such schemes from section 106 contributions for affordable housing. The starting point should be that starter home proposals are treated the same as other housing applications and be liable to the affordable housing policy in the adopted Development Plan, subject to viability testing.

Starter Homes exception site projects should not be exempt from any tariff-based contributions to general infrastructure pots. The occupiers of the homes will be using local infrastructure including medical surgeries, libraries, schools (may be at some time in the near future) and roads. They will therefore put an added burden on these services. As such the developers of Starter Homes should be liable, as is the case for other forms of housing proposals, to the payment of tariffs otherwise there is the

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risk that essential infrastructure may not be able to meet the needs of the local community.

Q10. Do you agree that Starter Homes exception site projects should be exempt from the payment of the Community Infrastructure Levy?

A10. No, please see answer to question 9, second paragraph.

Q11. Do you have any views on how this register (of first time buyers) should work and the information it should contain?

A11. The Government should work primarily with local authorities and draw upon information from the Housing Needs Register.

Q12. What kind of vanguard programme would be most helpful to support the roll out of Starter Homes?

A12. No comment.