

## Reigate and Banstead Development Management Plan Examination

### Written Evidence

Representor 0609      Union4 Planning

---

#### Policy DES6 - Affordable Housing

This statement is set out in the order of the questions raised in the Examination Issues.

##### Objection

- 1.11 Policy DES6 seeks an off site financial contribution equal to 10% on site provision for affordable housing on small sites, defined in the DMP as sites of less than 11 dwellings.
- 1.12 This is at odds with the NPPF (2018) and the preceding Ministerial Statement of 28 November 2014 both of which are relevant to this issue.
- 1.13 The Government's policy sought to tackle the disproportionate burden of developer contributions on small scale developers and others in delivering housing on small sites. This introduced a national policy threshold of 10 units or less beneath which affordable housing contributions should not be sought. This made it clear that this also applied to what were described as 'tariff style contributions' because of the disproportionate impact that this has.
- 1.14 The approach of the DMP is based on an outdated aspect of the Core Strategy that is at odds with this national policy.
- 1.15 The importance of small sites in delivering housing and in particular of increasing the supply of housing and the housing trajectory cannot be overstated. The Government have emphasised the importance of delivery by smaller developers, landowners, self builders and others in increasing the rate of delivery and reducing the reliance and lead in time needed for larger sites.
- 1.16 Anything that introduces uncertainty into this process, or which undermines confidence or viability will undermine the delivery of small sites. Small sites are typically in an existing use and the decision or choice as to whether to bring sites forward is often more marginal than on larger sites, where the level of profit is greater. This is not just about viability, though that in itself is a key issue, it is also about the added complication of associated legal agreements and the uncertainty of what the actual cost and implications will be. The reduction of profitability in bringing an existing site forward, when the relative costs of development for small sites are often greater and the existing uses have a value and 'opportunity cost', means that the decision to move forward with reduced profitability will be likely to result in fewer sites coming forward.

- 1.17 The Government are seeking to lower the construction cost of small-scale new build housing, encourage development on smaller brownfield sites and help to diversify the house building sector by providing a much needed boost to small and medium-sized developers. The number of small scale housebuilders has declined significantly since the start of the 2008 recession and has not recovered. It is critical to increasing the rate and diversity of supply and meeting housing needs. This is a critical period in reinvigorating the supply process and the Council's approach in this case is at odds with this aspect of Government policy.
- 1.18 It is our view that the policy is not justified in this regard, is not sound and is not positively prepared or effective. It will undermine a key aspect of Government policy, namely the delivery of an increased supply from small sites and discourage new entrants to the market. There is no evidence that justifies the departure from Government policy.

**What is the evidence to justify an off-site contribution for schemes of less than 11 dwellings?**

- 1.19 The evidence base does not support the introduction of a charge or contribution for small sites and certainly does not justify the exceptional circumstances required to depart from a recently stated national policy.
- 1.110 There is little to distinguish Reigate and Banstead from other South East authorities in terms of the issues faced in the delivery of housing and no basis for the imposition of an additional charge on small sites in this area.
- 1.111 It is clear in this case that there is no substantial evidence to justify a variance from the Written Ministerial Statement of 28 November 2014, the NPPF and Planning Practice Guidance.

**Has on site provision been considered?**

- 1.112 There is no real opportunity for on site provision in small site developments without introducing complexities in delivery that would further inhibit sites coming forward, with different mix of tenure and management arrangements and responsibilities.

**Is it clear how off site contributions would deliver the required affordable housing?**

- 1.113 There is limited information on how contributions would be pooled and managed to deliver affordable housing elsewhere. This relies on a supply of sites, multiple contributions and a delivery body to ensure this would be appropriately used, none of which is set out in the DMP.