



12 Market Place  
Faversham  
ME13 7AE

Thomas Webster  
Swale Borough Council  
Swale House  
East Street  
Sittingbourne, ME10 H3T

26<sup>th</sup> July 2021

Dear Mr Webster,

**App No 21/502927 – Phase 2 Lady Dane**

We write to sustain an objection to the planning application promoted by Crest Nicholson for the second phase of this site.

- 1 The development mix is unbalanced and weighted too heavily in favour of 4 bed market housing.
- 2 Insufficient social rented affordable housing is proposed.

The Faversham Community Land Trust (FCLT) is an organisation primarily concerned with the acquisition and development of land or buildings within Faversham for the good of the community. Our principal objective is to secure land or buildings to provide a perpetual supply of truly affordable housing for local people.

A Housing Needs Survey (HNS), specifically addressing the Faversham Market, was commissioned by FCLT to identify the focus of activity for the trust to meet their objectives. The Arc 4 HNS report, published August 2020 is attached. This is to be appended to the emerging Faversham Neighbourhood plan to identify the need for both market and affordable housing in Faversham and to inform development mix and tenure allocations.

*HNS Para 5.7 Overall, the HNS provides a significant body of evidence for the Faversham Town Council and the Community Land Trust to resist housebuilding that is not needed by local people and prioritise that which is needed.*

## 1.1 Imbalance in housing mix proposed for Phase 2 Lady Dane (all tenures)

We have reviewed the Planning Report prepared by Savills and note that housing mix is addressed in section 6. The agents acknowledge that NPFF Para 61 requires that the size, type and tenure of the housing needed for different groups in the community are addressed to deliver a wide choice of high-quality homes.

This subject is addressed in the HNS: -

4.41 Table 4.18 summarises the supply and demand scenario and provides clear evidence of the mismatch between supply and demand for different dwelling types. Key points that arise from the table are:

- whilst a number of households plan to leave Faversham over the next 5-years the overall number of households is expected to grow because of the number of newly forming households;
- the gap in supply is mostly 1 and 2-bedroom houses, bungalows and flats;
- whilst potential surpluses are predicted in 2, 3 and 4-bedroom houses these will be taken by incomers to the area.

The agents go on to correctly reference that Local Plan Policy CP3 aims to deliver a wide choice of high-quality homes and that any proposals should be tailored to the issues present within the local housing market area. They add that the mix of housing types should reflect the findings of the Swale Strategic Housing Market Assessment (SHMA) published in June 2020. The report then goes on to dismiss this study, stating that the calculations in table 5.4 of the SHMA do not add up. Whilst on the face of it this is correct the agent does not appear to have raised this anomaly with the Council for clarification.

Section 5 of the SHMA reports on affordable housing need only and does not consider demand levels across all tenures. These are set out in tables in Section 4 and enable the analysis of an appropriate blended mix. Section 4 is not considered or referenced in the planning report. In these circumstances the dismissal of the SHMA on arithmetical error within a single irrelevant table is a nonsense.

The only reference in the planning report relating to mix by bed size is a statement, extracted from the SHMA and echoed by the Housing Officer “there is a high level of demand for all bedroom sizes”. This is no surprise in the UK housing market with an enduring undersupply across all unit sizes and tenures. This statement is erroneously referenced in the report to imply that the applicants have free range to define the mix.

To calculate an informed balanced mix, it is necessary to blend the housing need data across all tenures in accordance with the allocation policy. The blended mix should therefore be based on 65% open market housing, 32% affordable social rent and 3.5% interim tenure.

The blended percentage can be derived from the tenure mix tables in Section 4.19 of the SHMA which analyses demand by bedroom size across all tenures. We have analysed

the data and blended the outputs from Tables 4.5 (owner occupied), 4.7 (interim tenure – shared ownership selected) and 4.8 (Social rent /affordable rent) to arrive at a policy compliant blended mix.

**Blended Mix Assessment - All tenures required in Swale over the 16 Year Plan period**

| Beds  | Owner Occupied  |        | Affordable/Social Rent |        | Interim Tenure  |       | Blended Change Required | BLENDED % |
|-------|-----------------|--------|------------------------|--------|-----------------|-------|-------------------------|-----------|
|       | Change required | 64.77% | Change required        | 31.82% | Change required | 3.41% |                         |           |
| 1     | 715             | 463    | 176                    | 56     | 787             | 27    | 546                     | 8%        |
| 2     | 3597            | 2330   | 210                    | 67     | 564             | 19    | 2,416                   | 34%       |
| 3     | 4255            | 2756   | 178                    | 57     | 873             | 30    | 2,842                   | 40%       |
| 4+    | 1815            | 1176   | 114                    | 36     | 596             | 20    | 1,232                   | 18%       |
| Total | 10382           | 6724   | 678                    | 216    | 2820            | 96    | 7,036                   | 100.00%   |

Having created this tool a comparison can be undertaken between the blended target mix proposed by the applicants and the mix prescribed by policy. This pinpoints the shortfall/surplus in the scheme set against the local plan target mix to 2038.

**Assessment of Shortfall/Surplus for Proposed mix revealed by comparison to Policy compliant target.**

| Beds  | Proposed Mix |              | Policy Compliant |               | VARIANCE Units |
|-------|--------------|--------------|------------------|---------------|----------------|
|       | Units        | Proposed Mix | Units            | Compliant Mix |                |
| 1     | 3            | 3%           | 7                | 8%            | -4             |
| 2     | 19           | 22%          | 30               | 34%           | -11            |
| 3     | 35           | 40%          | 35               | 40%           | 0              |
| 4 & 5 | 31           | 35%          | 16               | 18%           | 15             |
|       | 88           | 100%         | 88               | 100%          | 0              |

**Conclusion**

The analysis reveals an oversupply of 15 (17%) four bed units when assessed against local requirements

This oversupply is increased when owner occupied market housing is considered in isolation (stripping out the affordable allocation which is weighted heavily in favour of smaller units)

**Assessment of Shortfall/Surplus for Market mix revealed by comparison to Policy compliant target.**

| Beds  | Proposed Mix   |       | Policy Compliant (Market) |       | VARIANCE Units |               |
|-------|----------------|-------|---------------------------|-------|----------------|---------------|
|       | Market Housing | Units | Proposed Mix              | Units |                | Compliant Mix |
| 1     |                | 0     | 0%                        | 4     | 7%             | -4            |
| 2     |                | 6     | 11%                       | 20    | 35%            | -14           |
| 3     |                | 23    | 40%                       | 23    | 41%            | 0             |
| 4 & 5 |                | 28    | 49%                       | 10    | 18%            | 18            |
| Total |                | 57    | 100%                      | 57    | 100%           | 0             |

**Conclusion**

The analysis reveals a massive oversupply of 18 (25%) four bed units when assessed against local requirements this is predominately set against an undersupply of two bed units.

This is no surprise as housebuilders generate a higher profit on four bed house types and have access to a large market, generated by incomers to the town. This presents a significant high level of demand where considerable equity has been released from higher value areas. The HNS reports that residents in Faversham cannot compete in this market and consequently they are forced to move to lower value areas when upsizing or forming new households.

## 1.2 Imbalance in Housing Mix – Analysis of the six major Faversham developments approved under the waning local plan.

In addition to looking at the SHMA to identify the oversupply issue we have also undertaken research to analyse four bed oversupply across the major housing schemes (50+ units) approved in Faversham under the current local plan. This is to establish whether 4 bed overprovision prevails in the supply of housing stock coming into the market now. The analysis is appended.

The following conclusions are drawn from a compilation of the consented whole site mix across the six major schemes where detailed or reserved matters applications have been approved for 1023 new homes.

### Major sites approved under current local plan - assessment of oversupply/undersupply

| Beds  | Approved Schemes |      | Policy Compliant (2020) |          | Variance<br>Units |
|-------|------------------|------|-------------------------|----------|-------------------|
|       | Units            | Mix  | Units                   | SHMA Mix |                   |
| 1     | 34               | 4%   | 82                      | 8%       | -48               |
| 2     | 227              | 21%  | 348                     | 34%      | -121              |
| 3     | 435              | 42%  | 409                     | 40%      | 26                |
| 4     | 327              | 33%  | 184                     | 18%      | 143               |
| Total | 1023             | 100% | 1023                    | 100%     | 0                 |

There is a shortfall of small 1/2 bed homes of 169 units (14%).

As a rule, affordable housing and particularly apartments are primarily allocated to the smaller units. When affordable one and two bed homes are stripped out of the equation the supply of small market housing within the mix reduces significantly. The planning data set for some of the 6 schemes lacks clarity and a detailed analysis is not possible. Very few apartments have been delivered for the private sector.

## 1.3 Conclusions

The supply of housing in the UK is dominated by a small handful of major volume house builders who for commercial reasons prefer the development of four-bedroom homes. The analysis of the six major sites under construction in Faversham proves a hypothesis that the local market will be oversupplied by new four bed homes for incomers.

Lady Dane Phase 2 is the first major site in Faversham to come forward under the influence of the policy requirements of the emerging local plan.

The market mix proposed in the application does not provide any one bed homes and only 6 two bed homes (7%) for owner occupation. This is clearly unacceptable in the light of both the Faversham Housing needs survey and the Swale Housing market Assessment.

Ensuring a mix of good quality houses of different sizes, types and tenure can help not only to meet the needs of the community but can also help to create mixed and balanced communities. Communities that have a good mix of homes have more potential to support a variety of services and facilities, including shops, schools and local community buildings. They are also likely to be home to people of all ages which can mean that streets are 'alive' at all times of the day, increasing the potential for social interaction and community safety.

Market housing is not being built locally for local people; this is a prime driver of nimbyism. It also forces residents seeking to upsize and newly forming households from local families to move out of Faversham to the detriment of the community.

Local authority planning and housing departments generally focus consultation responses on mix for the affordable sector. They seem reluctant to consider the shape of the mix for private housing. Consequently, a blended mix across all tenures is rarely achieved, as clearly evidenced in the major projects supply review.

If steps are not taken to address this problem now, precedence will be set supporting the promotion of a disproportionate mix from all housing developments across the plan period from 2022 to 2035.

We believe that the developer must be compelled to revise the mix to align with the guidance in Section 4 of the Swale Housing Market Assessment to provide a balanced mix across both market and affordable tenures.

We also suggest that if there is a policy deficit to support the direction of mix supplementary planning guidance should be urgently drafted and approved. This will provide officers with robust tools to direct the mix to be delivered.

## **2 Affordable Tenure – Quantum and allocation.**

We support the policy compliant 35% per cent allocation of affordable housing across the development and agree with the housing officer that this should be delivered with a compliant mix at 90% social rented and 10% interim tenure.

The applicants cite, without disclosing evidence, that the Registered Social Landlords (RSL) have requested a more even tenure split at 70/30. They do not state why. On the face of it this is not a sound planning reason for rejecting a policy compliant tenure mix.

The Faversham Community land trust are at the early stages of applying for RSL status and aspire to acquire the affordable housing. We are keen to secure nomination rights so we can allocate the affordable homes to Faversham residents and would welcome a dialogue with Swale officers to review this.

We appreciate that our RSL registration may not be completed in time to align with the planning programme for the development. If this proves to be the case, we propose that consideration is given to agreeing the applicants 20% social rented tenure reduction in return for a commuted sum for an offsite provision within the Parish.

We would welcome an opportunity to review these proposals further with officers and would look for any commuted sum to be ring fenced in a supplementary S106 agreement to support the FCLT direct development programme in Faversham.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Atkins', written on a light-colored background.

Stephen Atkins

Land Director FCLT

cc Rebecca Walker - Affordable Housing Manager

Please reply to: - [Stephen.atkins@favershamcommunitylandtrust.org](mailto:Stephen.atkins@favershamcommunitylandtrust.org)

Link to Faversham Housing Needs survey: [www.favershamcommunitylandtrust.org](http://www.favershamcommunitylandtrust.org).

# APPENDIX 1

## FAVERSHAM MAJOR HOUSING SITES (50 plus units) APPROVED UNDER CURRENT SWALE LOCAL PLAN STATUS SNAPSHOT MAY 2019



APPENDIX 1

CURRENT LOCAL PLAN ACTIVE MAJOR SITES (50+ units)

HOUSING MIX ANALYSIS BY TYPOLOGY

| Site               | Beds | Number | Mix % |
|--------------------|------|--------|-------|
| Lady Dane Phase 1  | 1    | 9      | 5%    |
| Crest Nicholson    | 2    | 41     | 21%   |
| Ref. 18/501048 REM | 3    | 91     | 46%   |
| Plan Ref - 2       | 4    | 55     | 28%   |
|                    |      | 196    | 100%  |

|                    |   |     |      |
|--------------------|---|-----|------|
| Perry Court        | 1 | 10  | 3%   |
| Barratt            | 2 | 46  | 15%  |
| Ref. 17/506603 REM | 3 | 132 | 43%  |
| Plan Ref 3         | 4 | 122 | 39%  |
|                    |   | 310 | 100% |

|                             |    |     |      |     |
|-----------------------------|----|-----|------|-----|
| Western Link Oare - Phase 1 | 9  | 1   | 9    | 4%  |
| Vistry                      | 39 | 2   | 71   | 30% |
| Ref. 17/502604 REM          | 39 | 3   | 94   | 40% |
| Plan Ref 6                  | 36 | 4   | 62   | 26% |
|                             |    | 236 | 100% |     |

|                            |   |     |      |
|----------------------------|---|-----|------|
| <b>The Lakes - Phase 1</b> |   |     |      |
| Anderson                   | 1 | 0   | 0%   |
| Ref. 18/505418 REM         | 2 | 32  | 28%  |
| Plan Ref 4                 | 3 | 55  | 49%  |
|                            | 4 | 26  | 23%  |
|                            |   | 113 | 100% |

|                     |   |     |      |
|---------------------|---|-----|------|
| Tylman Place        | 1 | 6   | 6%   |
| Bellway             | 2 | 29  | 28%  |
| Ref. 16/508643 Full | 3 | 44  | 42%  |
| Plan Ref 1          | 4 | 26  | 25%  |
|                     |   | 105 | 100% |

|                    |     |    |      |
|--------------------|-----|----|------|
| Brogdale Road      | 1   | 0  | 0%   |
| Matthews Homes     | 2   | 8  | 13%  |
| Ref. 16 506644 REM | 3   | 19 | 30%  |
| Plan Ref 5         | 4/5 | 36 | 57%  |
|                    |     | 63 | 100% |

|   |   |      |      |
|---|---|------|------|
| <b>ALL SITE HOUSING MIX BY TYPOLOGY</b> |   |      |      |
|   | 1 | 34   | 3%   |
|   | 2 | 227  | 22%  |
|   | 3 | 435  | 43%  |
|   | 4 | 327  | 32%  |
|   |   | 1023 | 100% |

