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Dear Sir/ Madam

### **Response by the House Builders Federation to the Southend New Local Plan issues and options consultation**

Thank you for consulting the Home Builders Federation (HBF) on the latest issues and options consultation on the New 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 Southend Borough Council (SBC) 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.

#### **Housing needs**

The Council have stated that they will need to plan for between 18,000 and 24,000 new homes over the next 20 years. We appreciate that there was some uncertainty at the time this consultation document was published, however, this has now been resolved following the Government's response to the technical consultation undertaken at the end of 2018. This response confirmed that Council's should use the 2014-based household projections when calculating local housing needs and therefore SBC must prepare a plan that seeks to deliver a minimum of 1,178 dwellings per annum – circa 24,000 homes over the next 20 years.

However, paragraph 60 of the National Planning Policy Framework recognises that this is a minimum and that there may be circumstances where the Council's housing requirement may need to be increased. Firstly, the Council will need to consider whether there are unmet needs from neighbouring authorities that should be taken into account and secondly an assessment should be made as to whether a higher



requirement is required in order improve the provision of affordable housing, as established in paragraph 2a-024 of Planning Practice Guidance which states:

*“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*

Whilst we recognise that Southend’s administrative border is tightly drawn to the urban area it is essential that these elements are still taken into account when establishing the areas housing requirement as it is this final figure that will inform not only the Council’s own spatial strategy but the spatial strategy of its neighbouring authorities. The Council will also need to ensure that any changes in the affordability ratio are reflected in the assessment of needs in future iterations of the new local plan.

### **Spatial Strategy**

The consultation document sets out 3 options for the spatial strategy, however, only option 3 meets the development needs of the area and as such this is the only one that the Council must take forward. Given that the administrative boundary is so tightly bound to the urban area SBC must work closely with Rochford District Council to agree significant new urban extensions to Southend’s existing settlements in order to meet its development needs. As such we welcome the joint working with in south east Essex in examining strategic locations for growth. This evidence suggests that there is at least one broad area with potential for delivering strategic scale cross boundary development between Rochford and Southend-on-Sea.

However, the other areas assessed in this study should not be dismissed regarding their potential for development. They may offer opportunities for smaller scale development that will play an important part in the area meeting housing needs in the early part of the plan period. It will therefore be important that a fine-grained assessment of the cross-boundary opportunities is considered and where opportunities exist these are included in the local plans covering south east Essex. This fine-grained assessment of development opportunities will also need to extend to any assessment of the Green Belt to be undertaken. Too often we find these assessments fail to consider the limited impact on Green Belt arising from the release of smaller sites within the larger parcels being assessed by the Council.

The risks arising from not meeting needs are to some extent set out in the Council’s assessment of options 1 and 2. However, this assessment does not appear to recognise that failing to meet housing needs is itself a significant disadvantage to both these options. If overall needs are not met then the Council will most likely not meet the needs for affordable housing, house prices will increase, affordability will worsen and there is potential for more overcrowding within existing properties. These are significant disadvantages to both these options and should be recognised as such by the Council and inform any decision as to the most appropriate spatial strategy. In particular, the Council will need to consider the disadvantages on not meeting housing needs through the Sustainability Appraisal of the Local Plan.

Finally, given the need for a high degree of cross boundary working required to meet needs we would suggest that individual Statements of Common Ground are established (if they do not exist already) with both Rochford and Castle Point to provide clarity on how needs will be met in full across south east Essex. Whilst we appreciate that the South Essex JSP is intended to provide the main framework for strategic planning in future it is necessary for separate statements to consider issues between adjacent authorities and establish the actions and policies required to develop a strategy, as established in paragraph 35 of the NPPF, that meet the areas objectively assessed needs.

### **Densities**

The NPPF requires local planning authorities to make the most effective use of land in meeting the need for homes and other uses in their area. However, in making these decisions it will be important for the Council to reflect on the ability of development in Southend on Sea to achieve higher densities. Development viability, market conditions and the availability of infrastructure can all be barriers to significantly higher densities. Therefore, whilst the Council should seek to make the most efficient use of land it should be careful not to over-estimate the delivery expectations on sites in the urban area.

### **Affordable housing**

The Council ask on page 31 whether they should seek to include a higher housing requirement than the one currently in the local plan. Our first concern would be that the current policy is an aspirational target given that the level of affordable housing delivery is significantly below what was expected. The affordable housing contribution required by the local plan on development must not be aspirational but based on the viability of development to deliver that level of contribution. The level of contribution cannot lead to a negotiation on a site by site basis. Such an approach would be contrary to national policy which expects, as set out in in paragraph 57 of the NPPF, that all new development will be viable at the level of contributions required by the local plan. The expectation is that negotiation will be far more limited, and this will need to be reflected in affordable housing policies. If the Council wishes to deliver more affordable housing, then it should seek to allocate more land for development rather than seek to increase the proportion of affordable housing it requires from each site.

### **Optional technical standards**

Question 2.6 asks whether the Council should go beyond current building regulations to ensure new homes are accessible and adaptable. Whilst we recognise that some homes may need to be built to higher standards the Government has established that the optional technical standard should be based on evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need. In considering whether there is evidence to support the introduction of these standards the Government set out that these should include the likely future need for housing for older and disabled people, the size and type of housing needed to meet evidenced

needs, the accessibility of the existing stock and the need across different tenures. It must be remembered when considering the accessibility of new homes that all these dwellings will be built to part M4(1). According to Part M of the Building Regulations meeting M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey.

### **Community services and infrastructure**

The Council will also need to carefully consider the cumulative impacts of all its policies on development viability. Policies that require higher affordable housing contributions, higher technical standards, green infrastructure enhancements and improved energy efficiency will all increase the cost to the developer and reduce the ability of development to pay for the additional infrastructure and may potential increases to the Community Infrastructure Levy. As set out in paragraph 34 the NPPF the Council must ensure that the cumulative policies in the Local Plan do not undermine the its deliverability and the Council will need to consider the balance between place making policies, the provision of affordable housing and the infrastructure that is required to support new development. As set out above the Council must pay heed to paragraph 57 of the NPPF and ensure that development that meets all the plans requirements can be assumed to be viable.

### **Conclusions**

It is essential that SBC moves quickly and prepare a plan for publication and consultation under regulation 19 of the Town and Country Planning Regulations. In doing so it will be important that the Council works closely with neighbouring areas to ensure that needs are met in full. The Council will also need to balance their aspirations for place making with those for affordable housing and infrastructure. There is a danger that the Council expects the development industry to shoulder all these burdens and in doing so the deliverability of the local plan could be compromised. We hope these comments are helpful and we look forward to commenting on the next iteration of the local plan. if you would like to discuss these issues further please contact me.

Yours faithfully



Planning Manager – Local Plans

