



THE HOUSE BUILDERS FEDERATION

HBF response to the East of England Plan

Chapter 4: Core Spatial Strategy

Para 4.7

The HBF objects to the approach of continuing the existing RSS Strategy in the first 5-10 years of the Plan. It is acknowledged that the Plan has a start date of 2001, so that we are already into the fourth year with a significant undersupply of new dwellings against the annual target prescribed. We do not consider that it should take a further 6 years before the strategy is effectively adopted. This approach does not engender words such as visionary or progressive. Given that the strategy is seeking to develop specific strategic and spatial objectives such as regeneration and economic prosperity, the concern is that if the Plan does not try to translate these defined policy objectives into revised physical targets then it is not likely to deliver on these policy objectives.

The Plan justifies this status quo approach in the recognition of local development plans being completed. This appears to ignore the fact that the Town and Country Planning Act 2004 introduced a new development plan framework. The Regional Spatial Strategy, which is now a development plan, is at the head of the structure, below which local development documents will be prepared in support of the spatial strategy. The aim is that these local documents will be much more flexible than the former local plans so that they can adapt to a changing spatial strategy. The approach of this plan, however, appears to ignore this flexible framework.

Furthermore, the Region has undergone significant changes. The geographical scope of the region has been extended since the previous regional plan was adopted so that it now incorporates Bedfordshire, Essex and Hertfordshire. It is therefore very difficult to consider how the strategy can consider the merged region homogeneously through past strategies that have applied to separate geographical areas. Also, in terms of Government Policy, the region now embraces three Growth Areas and the idea that these Growth Areas should not seek to accelerate the rate of housing completions before 2011 is totally unacceptable.

The HBF fully acknowledge the drive towards sustainable development and the need to support new development with commensurate infrastructure provision. However, the Plan does not seem to want to consider this matter in a flexible perspective, in particular establishing where development can be accelerated in the short-term without the need for new strategic infrastructure. There are even examples where new infrastructure has recently been completed, thereby providing opportunities to accommodate new sustainable development, but which are ignored.



It is worth comparing this approach with that developed by the GLA in the London Plan where an aspirational long-term target of 30,000 new homes per annum is supported by a short term approach of maximising housing output beyond the previous RPG9 figure of 23,000 units. This is to facilitate a short-term increase in housing completions to address existing housing needs and work towards the higher target. The 30,000 target is dependent upon a revised housing capacity study, but in the short term existing output is not constrained by the existing capacity study. Indeed, the Plan establishes a broad spatial approach to development that facilitates new sustainable development, in particular making use of existing infrastructure, for example by encouraging development in town centres and at transport nodes.

There are no reasons why these flexible principles cannot apply to this Plan. Housing output since 2001 has been significantly below that prescribed in the Plan. It is therefore vital that the Plan sets a framework for development that facilitates a short-term increase in housing output, in order to move towards the long-term spatial strategy and policy objectives.

Para 4.9

The Plan refers to addressing the issues of major economic growth focused upon Stansted Airport and the M11 corridor, and the need for regeneration, mainly at Harlow but also in the Lee Valley area. The Plan proposes a strategy that seeks to strike a balance, ensuring that growth and change delivers regeneration first, before allowing more general growth and development in other areas.

The HBF do not support this approach. Regeneration cannot be delivered overnight. If the Plan has a policy of regeneration first, then this suggests that more general growth and development in other areas will be put on hold for a significant time. This is likely to have very harmful implications, in particular with new housing development, which is likely to fall significantly below planned levels through this policy of constraint. Regeneration and general growth and not incompatible and must be considered together. The Milton Keynes South Midlands Growth Area takes this approach, for example the regeneration of Corby does not mean that growth is constrained in adjacent areas to deliver this regeneration. Rather, it is recognised that both objectives can and should be delivered simultaneously.

In areas where regeneration is a prime objective it is important to look critically at infrastructure requirements and the likely timescale whereby strategic developments will start to materialise. In the short term surrounding areas must continue to grow to make sure that wider development objectives are secured.

Para 4.7 also addresses the London Arc and the impact of London's 'world city' role and the implications this generates in terms of both the housing market through in-migration to the region from London and out-commuting to London, and economic growth pressures in some local economies. The Plan establishes that this presents the strongest dilemma for the regional strategy – protection of green belt areas, versus the need to allow sustainable development in key London fringe towns and to redress unsustainable commuting patterns. To this must be added

the phrase in Para 4.7 of making sensible provision for the stronger southern economies, in order to ensure that the regional economy delivers prosperity and growth.

The HBF does not consider that this Plan has reached an appropriate balance between delivering economic growth and regeneration. Policy LA1 is promoting economic prosperity through town centre improvements, urban regeneration schemes and making more efficient use of existing employment land and green belt land releases only in exceptional circumstances. This approach does not allow for sufficient growth opportunities, in particular where local economies are flourishing.

We present a table in our comments on Para 7.6 – 7.12. This table compares housing growth targets for 2001-2011 (based on the average annual requirement) with the increase in workplace employment achieved from 1991-2001. This table shows a considerable imbalance between housing provision and recent levels of employment creation. It is likely that if the growth objective is to be given sufficient momentum then there will need to be additional green belt land releases than are currently proposed.

Policy SS1

The HBF does not consider that the spatial strategy aims to achieve a sustainable relationship between jobs, homes and services at the strategic and local level. Rather it seeks to achieve this at the regional and sub-regional level. In particular the Plan seeks to achieve housing and employment alignment. However, there is an overriding concern that there is no overall link and relationship between housing policy and employment targets and aspirations.

Employment and housing targets are not provided on the same spatial scale, so that it is difficult to link the targets together. Employment targets are based primarily at a sub-regional level whilst housing targets are at a district level. This difficulty is compounded by the lack of spatial delineation of the defined sub-regions and an inconsistency between the sub-regions and sub-areas defined in chapter 5 and those listed in Policy E2.

With an overall target of new employment creation of 421,500 jobs and 478,000 new dwellings, the Plan is broadly in equilibrium. However, this equilibrium would become unbalanced with the additional 'Rooker 18,000' dwellings and further unbalanced with the level of dwelling provision suggested by the HBF under Policy SS13. The HBF consider that the economy has the potential to expand at a faster rate than proposed in the Plan, so that additional dwelling provision can be supported by additional employment to maintain this equilibrium.

From a spatial perspective, this equilibrium is less than clear at the sub-regional level.

The overall approach to sustainable development is supported. However, it is not clear that the Plan, in identifying development opportunities, is making the best use of existing transport infrastructure, in particular where recent improvements have

taken place. This must be balanced with a spatial approach to development that will deliver the urban renaissance, but require considerable infrastructure provision, for example the Harlow Bypass.

If the Plan relies too much upon spatial objectives that require long-term strategic infrastructure, then this may adversely affect housing delivery, in particular in the short-term where infrastructure is already in place to support sustainable new development.

Policy SS2

There is an element of confusion within the Plan regarding the overall approach of the spatial strategy. The main body of the Plan relates to a sub-regional approach whereas SS2 refers to key centres. The policy itself states that the nature of development and change in these areas will vary according to sub-regional circumstances. Yet the Policy does not really fuse these two issues together.

Policy SS3

The HBF support an overall sequential approach to development. However, the sequential approach to development requires a degree of flexibility. It should operate in a context of securing overall development targets. The plan recognises that green field land releases will be necessary to deliver dwelling targets. Policy SS3, however, is constraining land release beyond urban areas to circumstances where this would not adversely affect the need to make maximum use of previously developed land and efforts to deliver sub-regional urban renaissance.

It should be clarified in this policy that land releases beyond urban areas will often need to take place in tandem with previously developed land to ensure that annual housing targets are being met. The expectation for future releases of previously developed land is not acceptable as a rationale for short term green field land releases to maintain a steady supply of dwellings.

Policy SS7

The HBF does not consider that this approach to Green Belt review is sufficiently flexible, in particular with regard to development within the London Arc. The HBF believe that the Plan does not make sufficient provision for housing in this Arc. This is based on two premises. Firstly, when comparing employment change from 1991-2001, this suggests that there will be an undersupply of new housing to meet likely economic growth. Also, there will be increased migration pressures from London generated by significant growth in international migration into London. These influences will generate a need for additional housing provision, which in itself will put pressure on the Green Belt.

Currently, Green Belt reviews within the London Arc are focussed upon regeneration objectives whereby Harlow, Luton/Dunstable/Houghton Regis and Upper Lee Valley are all included in Policy SS11 as areas with high deprivation. A much broader and flexible approach to Green Belt land releases in this area, which includes a growth agenda, must be taken if the Plan is to meet sustainable development objectives.

Furthermore, there is an inconsistency between the Cambridge Green Belt and the rest of the region in that the Plan states that no further review of the Cambridge Green Belt is needed up to 2021 whereas elsewhere reviews will ensure that sufficient land is identified to avoid further green belt review before 2031.

Policy SS10

The HBF consider that the regional economy has potential to grow by more than the 421,500 additional jobs that are proposed. This will be necessary to support the increased housing requirement that the HBF have suggested, in order to ensure that sustainable development objectives are delivered and that housing and employment alignment is secured.

The East of England Annual Monitoring Report 2004 Table 2.30 identifies that workplace employment increased by over 263,000 or 12.4% in the 10 year period from 1991-2001. The Draft Plan is proposing a total employment increase during the Plan period of 421,500 additional jobs. This would represent a total increase in workplace employment of 17.7% over 20 years. This is a much slower rate of growth than actually occurred during the previous 10 years.

If this employment generation were assumed to occur at a progressive rate than this would mean an increase in workplace employment of 8.8% from 2001-2011 and 8.1% from 2011-2021(based upon a workplace employment increase of 210,750 per decade). This establishes that the Draft Plan is proposing a significant slowdown in the growth of the regional economy in employment creation terms. Using the 1991 workplace employment figure, the increase per decade would be 9.9% from 2001-11 and 9.0% from 2011-21.

We believe that the economy is capable of generating additional growth in a sustainable form. The short-term UK economic forecast is positive whereby UK GDP is expected to grow by 3 to 3½ per cent in both 2004 and 2005, unchanged from both the Budget 2003 and the 2003 Pre-Budget Report forecasts. By 2006, growth is expected to return to its trend rate of 2½ to 3 per cent.

If the ratio of new housing to employment creation of 1: 0.88 were used, which is the ratio of the total housing to employment figures provided in the Plan (478,000:421,000), then a total housing requirement of 541,200 would indicate a total employment increase of 476,300.

Policy SS13

The HBF object to the overall level of housing provision within the Plan at 478,000 dwellings. Firstly, it is not clear what the exact delineation of this target figure is. The Tym Report 'RPG14 Housing and Employment Alignment Final report August 2004 Para 3.17 clarifies that this figure was the midpoint between the jobs-led EG21 Plus figure of 23,600 dpa and the Affordable Housing Study figure of 24,200 (in other words satisfying affordable housing need) with Para 3.22 confirming that it is the mid-point between a jobs-led figure and a figure generated by a different methodology intended to look at satisfying affordable housing need.

Secondly, the Government requested that an additional 18,000 new dwellings be provided within the region, which was part of an additional 40,000 dwellings that

the Government sought to be accommodated within the Thames Gateway. Whilst EERA took the decision not to incorporate the additional 18,000 dwellings, we do not support the reasons for this of infrastructure constraints preventing the additional growth from being accommodated in a sustainable manner.

The Tym Report (Para 8.8) confirms that the Peterborough Growth Area and London Stansted Cambridge Peterborough studies both suggest that, based on sustainable economic growth, there are enough sustainable locations with potential across this wider area to accommodate this requirement sustainably. There is therefore no justification to defer the decision whether to plan for this additional growth through a review of the Plan, which is scheduled to take place in three years time.

Whilst the HBF would expect the additional 18,000 dwellings to be incorporated into the Plan, we have also considered a household requirement target that is a 'top down' approach based upon demand. Detailed below is an alternative calculation for the housing requirement, which is set at a level of 541,200. In addition the Plan (using the target annual rate of 23,900) has undelivered by 24,484 units and so the annual rate must be adjusted in order to recover this shortfall.

Alternative calculation for the Dwelling Requirement 2001-21

2002-based household projections @ 491,000 x 1.03 ratio	506,000
Additional allocation to Bedford & Luton Growth Area	2,000
Current unmet need	13,200
Additional in-migration from London	20,000
Total housing requirement	541,200
Under provision 2001-2004	24,484

2002-based household projections

In September 2004 the ODPM issued new projections of households for England in total and for the regions from 2001-2021. The total housing projection for the East of England is 491,000. This is then multiplied by a standard household to dwelling conversion factor of 1.03 to account for vacancies (refer Para 4.56 RPG14 housing and Employment Alignment Final report).

These are interim projections derived from the Government Actuary's Department's (GAD) 2002-based projection of the population of England and regional population projections derived from it by the Office for National Statistics (ONS). Significantly, marital status and proportions that head households (headship rates) are the same that were used in the 1996-based projection and so do not take on board any 2001 Census information about marital status and headship rates.

The net increase in households is therefore the result of differences between the 1996-based and 2002-based population projections. The two main reasons for the difference are increases in length of life and higher net inward migration assumptions (from 65,000 to 130,000). GAD intend to issue 2003-based population projections and unless the inward migration assumption is revised downwards the 2003-based population is likely to be higher and hence so too is the projection of households that are anticipated to become available in 2005.

Against this, there are grounds for concern about whether the 1996-based assumptions of marital status and household headship overstate the number of households relative to population (and therefore overstate the prospective increase in future years). Both of these key components of the interim household projections will be superseded by 2001 Census based assumptions, which will be utilised by the 2003-based projections. The first is likely to revise household numbers down in future years, relative to interim projection; the second is likely to result in an upward revision.

However, it is apparent that there have been significant changes in demographics since the assumptions for the 1996-based projections were settled (in 1998). The HBF therefore consider that these interim projections are the most accurate and up to date figures available and should therefore be utilised in assessing household need over the Plan period.

Additional allocation to Bedford & Luton Growth Area

The Report of the panel into the Milton Keynes & South Midlands Sub-Regional Strategy proposed an additional 19,500 new dwellings in the Bedford/Kempston/North Marston vale growth area from 2001-2021 and 24,300 new dwellings in Luton, Dunstable and Houghton Regis over this period, making a total of 43,900 dwellings. However, the Secretary of State's Proposed Changes to the Milton Keynes & South Midlands Sub-Regional Strategy make provision for 26,300 new dwellings at Luton, Dunstable and Houghton Regis so that a total of 45,900 new dwellings are to be built in total within that part of the Growth Area that is contained within the Eastern region.

The Draft Plan only makes provision for 43,900 (refer to footnote 1 to Policy H1). This will have the effect of increasing the Regional Housing Requirement to 480,000. Although the Regional Assembly have submitted representations to this Proposed Change, it is considered necessary to accommodate the additional 2,000 units into the Regional Plan.

Current unmet need

The 2002 interim household projections include a definition of a household that includes a group of people living at the same address with common housekeeping, which means sharing either a living room or at least one meal a day. This gives rise to the concern that this definition will not take into consideration unmet need.

There are two specific categories of unmet need: (i) Households and potential households without separate accommodation (9,500) and (ii) Families in temporary accommodation (3,700). The figures are taken from Table 6 of the East of England Affordable Housing Study Stage 2. They total 13,200 households.

Additional in-migration from London

The 2002-based household projections detailed above have significant implications for London with an increase in the number of households of 927,000 or 46,400 per annum. The GLA have criticised the assumption in the projections that average household size will continue to fall and that household formation rates from the 2001 Census will reflect a more static average household size in London, therefore lowering projections.

Nevertheless, it is evident that the population of London will be projected to increase significantly, fuelled largely by the impact of inward migration. The target for household completions in London is at least 23,000 new homes a year between 2004-2016, with an aspirational target of at least 30,000. The London Plan Annual Monitoring Report 1 identifies that 24,608 additional homes were provided in London in 2003, which is claimed to be a thirty-year high. The aim of the GLA is that London becomes self-sufficient and supports its own population increase.

Even if the 2003-based projections fall from 46,400, it is unlikely that the decrease will be to 30,000. As stated above, housing completions in London have increased. However, given that they are currently at levels not experienced in the recent past, the HBF does not consider that the rate of completions will continue to accelerate. In particular, there are significant infrastructure issues in London and the Crossrail project is far from being confirmed.

This establishes that London will not achieve this goal of self-sufficiency and there will be an increase in migration from London above existing levels. The majority of migration from London is into the South East and East of England. Even if we set the increased level of migration from London to the East of England at a fairly low level of 1,000 households per annum, this would require an additional 20,000 additional dwellings over the plan period. The HBF will undertake further work to assess the implications of this migration, and we would welcome the opportunity to present additional information at the Examination in Public either through formal attendance or by written representation.

Under provision 1996-2001

Housing Completions – Eastern Region

Source: ODPM

Year	Private Enterprise	RSL/ Authority	Local	Total
1990	20,690	3,770		24,460
1991	18,871	2,111		20,982
1992	17,748	2,596		20,344
1993	17,617	3,259		20,876
1994	18,762	3,504		22,266
1995	18,067	3,504		21,571
1996	18,382	3,403		21,785

1997	19,197	2,078	21,275
1998	17,201	2,834	20,035
1999	16,394	1,820	18,214
2000	14,806	1,699	16,505
2001	14,517	1,542	16,059
2002	15,801	1,227	17,028
2003	17,197	1,454	18,651
2004	17,225	2,153	19,378

The above table shows the rate of new housing completions in the East of England on an annual basis. If the annual output prescribed in the Draft Plan of 23,900 dwellings from 2001 is taken into consideration, then there has been a shortfall in provision in the first three years of the plan of 24,484 dwellings (which will increase further having regard to completions in the first three quarters of 2004). This shortfall must be addressed if we are to meet the overall housing target for the entire plan period (currently set at 478,000). The HBF consider that this shortfall must be factored into the remaining Plan period (i.e. 2004-2021) if this shortfall is to be met.

This issue of dealing with a backlog of need was considered at the Milton Keynes & South Midlands Sub-Regional Strategy Public Examination, notably for Milton Keynes where output has been running well below prescribed levels. The Panel took the view in their report (Para 7.22) that the backlog represents additional housing that is urgently required and, significantly, that provision should be made for it to occur at the earliest time.

The HBF endorse this approach and consider that it must be applied to the East of England Plan. This does, however, raise the issue of how this backlog is to be distributed and also the timing of meeting this backlog, given that the Plan does not include any phasing mechanisms for housing delivery.

The HBF object to the quantum and type of affordable housing to be sought. The requirement for 7,200 net additional social rented units appear to have been taken from the technical report 'The Provision of affordable housing in the East of England 1996-2021 (Cambridge centre for Housing and Planning Research with Colin Buchanan and Partners, February 2003). However, according to Table 11a of this report, the total newly arising annual affordable housing need of 7,200 was within a total need for additional housing of 26,700 per annum. Also, this applied to a time period of 1996-2021. The 7,200 applied to social rented housing or private renting with housing benefit.

It is not clear from the report what precise definition of affordable housing has been used. Para 4.2.18 refers to lettings by local authorities and RSL's at subsidised rents, and RSL shared ownership. Para 9.13.1, however, refers to affordable housing as social rented housing or private renting with housing benefit.

Table 11a shows a forecast of market demand averaging between 19,000 and 20,000 a year. However, with a required provision of 7,200 net additional dwellings for social rented accommodation within an overall target of 23,900 units

this leaves only 16,700 units for owner occupation including low cost home ownership. The HBF does not consider this to be an adequate provision. Not only is it well below 19-20,000 figure, it is also less than the 17,197 private enterprise dwellings delivered in 2003 as detailed in the table above.

Furthermore, a further 760 dwellings per year are being sought to meet public sector key worker needs (although it is of concern that the East of England Affordable Housing Study Stage 2 (page 16) assumes an intermediate requirement of 10% of the total housing requirement at 2,400 units per annum. The Plan is therefore prescribing a reduction in private sector housing completions from that recently achieved with the existing planning framework. This does not support the reference to higher development rates stated in Para 4.7 and the region embarking on a policy of containing three Growth Areas. This is totally unacceptable.

Para 4.66 confirms that housing supply is falling below the region's needs. This Para establishes that a key requirement is that the bulk of the increase in housing supply up to 2021 should be in the affordable housing sector. This implies that there will also be an increase in the supply of private market housing.

The concern is that there is insufficient overall housing provision to meet need and that the lack of private housing will in itself have a negative impact upon the delivery of affordable housing (given that most affordable housing is supplied through Section 106 agreements).

It is clear that Government housing policy is shifting away from the approach to housing provision taken in the Plan. The Five Year Plan that was recently launched by the Government had a much greater emphasis on improving opportunities to acquire an equity stake in property. With regard to new build housing, this was emphasised in the Five Year Plan through schemes such as the new First Time Buyer's Initiative using publicly owned land for new homes, supported by a competition for developers to build homes at lower costs.

In terms of establishing the level of supply between different tenures the emphasis is now upon housing assessments that seek to establish household need in all tenures within a localised area. So, the traditional approach of establishing affordable housing need independently from market housing is now redundant.

This suggests that a much more flexible approach to housing supply requirements by tenure must be incorporated within the Plan. This must allow for much greater opportunity to determine housing need by tenure at the local level, supported by housing assessments.

Para 4.65

The HBF does not consider that this Plan has taken a realistic assessment of the level of out-migration from London. Rather, the Plan has assumed incorrectly that green belt restraint will suppress outward migration. This is an incorrect approach whereby migration will continue and simply exert additional inflationary pressures on house prices, notably within the London Arc. The housing supply must

therefore be increased within this arc with a more flexible green belt policy incorporated into the sequential approach to development to facilitate this increase.

Para 4.66

The Plan makes reference here to at least 7,200 affordable dwellings being required. This is distinct from 7,200 subsidised social rented units. This requires clarification.

The HBF agree that the additional affordable housing provision will need to be met by a step-change in Government financial support. The ODPM Consultation Paper 'Housing Investment in the Regions' (December 2004) sets out the regional split of funds for housing investment allocated through Regional Housing Pots. The allocation for the East of England is increased from £167million in 2005/06 to £255million in 2007/08, an increase of 52%. However, the HBF do not consider that this will have a significant impact upon delivering the affordable housing target proposed in the Plan. This funding must be compared to £415million in the South East and £1,220million in London. Delivery of the affordable housing target will remain dependent upon the private sector.

Para 4.67

This Para states that a significant proportion of the additional affordable housing needed is for key workers. Yet the Plan effectively prioritises subsidised social rented units at the expense of all other forms of affordable housing.

Policy SS14

The HBF support the use of sustainable drainage systems. However, in some circumstances this may not be practical, for example there may be management difficulties. The policy should therefore include the phrase 'where possible'.

In the final criteria the phrase 'and the risk can be fully mitigated' should read 'or the risk can be fully mitigated'.

Policy SS16

The reference to the density of development being no less than 30 dwellings per hectare requires further qualification and should also have regard to the character of the surrounding area. Para 56 of PPG3 advises that considerations of design and layout must be informed by the wider context.

Chapter 5: Sub-regional and sub-area policies

The HBF consider that the Plan would benefit from a map that clearly defines the sub-regions/sub-areas. The Plan includes such a map at the rear. However, this is small and lacks clarity so that it is difficult to ascertain the precise areas to which each sub-region relates. Notably, the boundary of the Norwich sub-region is to be defined, whilst the London Arc, Bury St Edmunds, Stevenage and Thetford have no defined areas at all. The lack of clarity with the spatial delineation of the London Arc is of particular concern.

It is not clear exactly what level of strategic direction the sub-regional and sub-area policies are supposed to be providing. The Plan is not clear whether a prescriptive approach to employment and housing is to be applied to the sub-regional chapter as employment growth and housing targets are only given for some sub-regions.

For example, with the King's Lynn sub-region no quantitative targets are included, although Policy KL2 stating that studies will be carried out to examine a potential step change in the delivery of housing and employment growth. Policy E2 then includes a job growth target of 9,900 within the Rest of Norfolk. The housing targets are provided by district. What are the strategic implications of all this? Para 5.174 establishes that the sub-region extends beyond Norfolk into Cambridgeshire (and Lincolnshire) and parts of the districts of Breckland and North Norfolk. Does it mean that Kings Lynn and West Norfolk, Breckland and North Norfolk districts will need to co-ordinate to determine the level of employment growth within each district and the strategic location of that growth based upon the sub-regional analysis?

The HBF consider that a more consistent and systematic approach to the sub-regional analysis should be applied. This should be based upon a definitive map supported by key strategic spatial objectives, a clear indication of key infrastructure requirements and a spatial quantitative break down of housing and employment targets that will facilitate the preparation of Local Development Frameworks at a local level, including identification of circumstances where co-ordinated decisions on the location of strategic housing and employment provision will need to be taken between local authorities.

The approach for the Haven Gateway sub-region appears to meet this approach. The strategy is outlined, including specific regeneration objectives. This strategy is then related into a quantitative analysis both in terms of employment and housing provision, with the housing analysis clearly identifying the strategic location of housing growth within specific districts. The transport infrastructure requirements are listed and specific environmental considerations detailed.

Cambridge sub-region

The HBF support Para 5.108, which seeks to maintain growth of the sub-regional economy. The sub-region is within a Growth Area. However, we question whether the strategy is enabling sufficient growth of the local economy. The Tym Report 'RPG14 Housing and Employment Alignment Final report August 2004 (Para 6.70) suggests that there is a requirement to accelerate housing provision above that proposed to meet the stated employment target. This would need to be increased further if the economic potential of the sub-region is facilitated.

We would therefore seek an increase in employment and housing provision within this sub-region to meet the above issues. This will also have implications in terms of the Green belt and we object to the approach within the Plan that no further review of the Cambridge Green Belt is needed up to 2021 whereas elsewhere reviews will ensure that sufficient land is identified to avoid further green belt review before 2031.

Chapter 7: Housing

Policy H1

The HBF object to the total level of housing provision at 478,000 dwellings. We consider that the total level of new housing provision necessary to meet demand and recover under provision from 2001-04 is 550,700 dwellings. The components that generate this total are explained in detail in our response to Policy SS13.

This additional output will obviously impact upon the distribution of housing. At this stage we wish to reserve detailed analysis of the precise distribution of this revised dwelling provision and will provide this information either through written representation or attendance at the Examination in Public.

The HBF consider there to be an error in footnote 1 to this table. The Secretary of State's Proposed Changes to the Milton Keynes & South Midlands Sub-Regional Strategy makes provision for 45,800 net additional dwellings for the Bedfordshire growth areas.

Para's 7.6 –7.12

This section of the Plan provides a degree of explanation to the housing distribution at a local level. What is surprising is the lack of any reference to local economic development. The East of England Annual Monitoring Report 2004 Table 2.31 provides information on workplace employment at a district level. This allows for the opportunity to compare housing growth targets for 2001-2011 (based on the average annual requirement) with the increase in workplace employment achieved from 1991-2001.

The table below draws this comparison.

Authority	Employment Change (Annual Average 1991- 2001)	Proposed Dwellings (Per Annum)
BEDFORDSHIRE		
Bedford	530	42
Mid - Bedfordshire	748	414
South Bedfordshire	386	80
Luton UA	88	-
CAMBRIDGESHIRE		
Cambridge	855	735
East Cambs	484	430
Fenland	380	505
Huntingdonshire	1083	560
South Cambs	1077	1175
Peterborough UA	1713	1060
ESSEX		
Basildon	1155	535

Braintree	679	385
Brentwood	463	145
Castle Point	187	200
Chelmsford	942	700
Colchester	678	855
Epping Forest	314	550
Harlow	374	400
Maldon	349	120
Rochford	103	230
Tendring	552	425
Uttlesford	824	400
Southend UA	248	300
Thurrock UA	782	925
HERTFORDSHIRE		
Broxbourne	263	255
Dacorum	1249	315
East Hertfordshire	511	1040
Hertsmere	765	210
North Hertfordshire	413	790
St Albans	461	350
Stevenage	512	320
Three Rivers	617	180
Watford	542	230
Welwyn Hatfield	906	290
NORFOLK		
Breckland	535	760
Broadland	596	610
Great Yarmouth	85	300
King's Lynn & West Norfolk	409	550
North Norfolk	581	320
Norwich	190	530

Para 4.7 of the Draft Plan identifies that the strategy seeks to recognise and make sensible provision for the stronger southern economies. The table above does not confirm this recognition and suggests that additional housing allocations are required if local economic development is to continue broadly as occurred in the previous decade. Given that the Plan confirms in Para 4.7 that the Draft RSS strategy is continue the existing RSS strategy in the first 5-10 years, then this would support a continuation of previous trends.

The London Arc demonstrates potential imbalances. In Essex, this table identifies severe under provision of housing at Basildon and Brentwood within the London Arc, whilst the dualling of the A120 is likely to add to economic growth pressures at Braintree and Uttlesford suggesting a need for additional housing provision to meet

continued economic growth. This analysis would support the need for the additional Rooker 18,000 dwellings in the London, Stansted, Peterborough, Cambridge Growth Area.

In Hertfordshire, the table illustrates that the strategy will require a substantive down turn in the local economies at Dacorum, Hertsmere, Three Rivers and Welwyn Hatfield to meet the level of housing growth proposed, whilst at East Hertfordshire and North Hertfordshire substantive economic growth will be required.

With regard to the ability of the construction industry to deliver increased development rates, the HBF has commissioned a research project with the Construction Industry Training Board to assess what the implications would be in relation to recruitment and skills associated with delivering a significant increase in the housing supply in accordance with the recommendations of the Barker Report. The HBF would welcome the opportunity to provide an update of progress with this project and associated outputs at the Examination in Public.

Para 7.13

The HBF recognise that housing delivery is linked to infrastructure provision. It is essential that appropriate measures are taken at a very early stage to establish infrastructure requirements, potential costs and mechanisms to forward fund this provision. The Plan needs to clarify a process to facilitate this.

Para 7.16

PPG 3 Consultation Paper - "Planning for Mixed Communities" is emphasising the need for a mix of housing through an evidence base on the nature and level of housing demand in local housing markets, and not this approach of considering affordable housing needs separately from other housing tenures.

Policy H3

The HBF are unclear why local development documents are to be prepared having regard to housing sub-regions defined in the East of England Regional Housing Strategy and the reference to Map 7.1. This map is not consistent with the sub-regional analysis provided in Chapter 5 and will not lend to consistency between the Regional Spatial Strategy and Regional Housing Strategy.

It is agreed that urban renaissance should not be undermined by the early release of Greenfield land. However, overall housing targets should equally not be undermined by holding back Greenfield land when sites (presumably primarily on previously developed land) that it is considered would support urban regeneration more directly are not coming forward at a sufficient rate to ensure an appropriate trajectory of housing supply is delivered.

Para 7.23

Emphasising the link between greenfield land allocations or permissions and urban renaissance demonstrates the focus of this Plan upon regeneration at the expense of delivering growth objectives. The immediate implications of this approach is that

local authorities will unreasonably hold back greenfield land releases on the basis of the implications on urban renaissance objectives in other local authorities.

Land releases must be within a framework of ensuring that overall housing targets are delivered and this must be within a context of delivering the broader objectives of the Plan, which will include both economic growth and regeneration. Given that the Plan has a target for development on previously developed land of 60%, this will require substantive land release beyond urban areas. This cannot be dealt with in ad-hoc, sporadic manner tied to rates of development in adjacent authorities.

The process requires considered strategic planning that will maintain housing delivery rates and provide for adequate opportunity to plan effectively for infrastructure provision necessary to support growth. This is a fundamental role for the regional spatial strategy, which the HBF does not consider the Plan has prescribed with sufficient clarity.

Policy ENV2

The HBF object to the phrase 'strongest levels of landscape character protection'. This should read 'appropriate levels'.

Policy ENV3

The HBF object to the phrase 'strongest levels of protection'. This should read 'appropriate levels'.

Policy ENV8

Object. The HBF does not consider that this policy is relevant to a spatial development strategy. It is addressing matters that are within the scope of other legislative requirements and PPS1 Para 30 states that planning policies should not cut across other legislative requirements.

Policy ENV9

Object. It is not always practical to introduce sustainable drainage systems. There should be greater flexibility.

Policy ENV11

Object. The HBF does not consider that this policy is relevant to a spatial development strategy and should be dealt with through the waste management strategy.

Policy ENV12

Object. The HBF does not consider that this policy is relevant to a spatial development strategy and should be dealt with through the waste management strategy.

Policy ENV13

Object. The HBF does not consider that this policy is relevant to a spatial development strategy and should be dealt with through the waste management strategy.

Policy ENV14

Object. The HBF does not consider that this policy is relevant to a spatial development strategy and should be dealt with through the waste management strategy.

Minerals

The HBF does not consider that the section on minerals is relevant to the Spatial Development Strategy

Policy C3

The HBF are unclear with the relationship between local planning authorities encouraging appreciation of art and design and the spatial development strategy. Is this the remit of the local planning authority?

Policy IMP1

It is essential that appropriate measures be taken at a very early stage to establish infrastructure requirements, potential costs and mechanisms to forward measures to facilitate the timely delivery of infrastructure.

Policy IMP2

The approach needs to go further than good practice guidance and needs to be supported through working groups with appropriate private sector representation.

Policy IMP3

The HBF support the role of LDVs. In facilitating implementation of the strategy it is necessary that these vehicles be established early on in the plan period.