

Sent by email to: [worthinglocalplan@adur-worthing.gov.uk](mailto:worthinglocalplan@adur-worthing.gov.uk)

11/12/2018

Dear Sir/ Madam

## **Response by the House Builders Federation to the Draft Worthing Local Plan**

Thank you for consulting the Home Builders Federation (HBF) on the Draft 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.

### **Plan period**

We note that the plan period starts in 2016. This start date is not in conformity with national policy and guidance. Paragraph 2a-004 of PPG states that the baseline for the calculation of the standard methodology is the current year. Given that the uplift for affordability applied in step two of the standard method seeks to address the affordability concern created due to poor delivery in previous years logic dictates that the start date for the plan should start from the same period. We would therefore suggest for the purposes of soundness that the Plan period is adjusted to the year in which the plan is submitted. Alongside this it is important to note that Paragraph 22 of the NPPF states that the Council should seek to prepare a plan that looks ahead for a minimum of 15 years. If the plan is to be submitted and examined in 2019 the plan should therefore, as a minimum, be extended to 2034 to be consistent with national policy.

### **Housing needs and supply**

The Local Plan and Housing Implementation Strategy state that the housing needs using the standard methodology is 753 dwellings per annum (dpa), which gives a total for the plan period of 12,801 homes. In arriving at this figure, the Council used the 2016 based household projections, however, it looks likely that this dataset will not form the basis of the standard methodology and the Council will need to revert to use of the 2014 projections. Using these projections would require the Council ensure the delivery of 865 dpa if the are to provide the necessary uplift in housing delivery that is will address the growing affordability concerns in Worthing.

With regard to the supply of homes to meet this need the Local Plan outlines that it will not be possible to deliver the number of homes requires to meet the figure established



in using the standard methodology. The Plan cites a range of physical and environmental constraints that will prevent the Council from meeting this target and lead to only 4,182 new homes being delivered in the Borough, less than half of the homes that the Government considered to be required to meet needs and improve affordability in Worthing.

In considering the soundness of the Council's decision not to meet needs we appreciate that Worthing is constrained by the national park to the north and the coast to the south. Alongside this the Borough's boundary is drawn relatively tight of the urban edge and as such the opportunities for further development are more constrained than in many other Boroughs. As such it will be essential that the Council ensures that any homes that are not delivered in this Local Plan are delivered elsewhere. This is a fact that is recognised by the Council but at present there is no evidence to show where these homes will be delivered. All co-operation would appear to have achieved at present is agreement on the cross boundary and strategic concerns but with very little progress as to the solutions. Paragraph 61-007 of PPG outlines the expected activities that need to be documented and this includes the preparation of strategic policies in relation to the delivery of unmet housing needs. It will therefore be essential that such policies are prepared in partnership with neighbouring authorities to identify how development in the area can be substantially increased.

#### **SP5 - Local Green Gaps**

One such area where the Council will need to work in co-operation with its neighbours is how it can increase development between those settlements along the coast. Given the other constraints faced by the Council it seems contradictory that they should then seek to limit opportunities even further by the inclusion of policy SP5. By including green gaps around Worthing with the aim of preventing coalescence the Council are in effect creating a Green belt around Worthing and its neighbouring settlements. This is not consistent with national policy, even more so considering the Council's inability to meet housing needs.

The Government have established in foot note 6 of paragraph 11 those parts of the framework that may prevent an authority from meeting needs. This footnote does not include green gaps and we would suggest that consideration needs to be given as to the allocation of land in these locations could help to meet needs. As such we consider this policy not to be consistent with national policy and it must be deleted. Instead the Council should work with its neighbouring authorities to see how they could deliver development jointly in these areas rather than placing a further constraint on development in their local plans.

#### **SP6 – Local green Space**

In designating local Green Space, it is important to ensure that they conform the paragraph 100 of the NPPF. In particular we are concerned that the Council is seeking to designate extensive tracts of land in order to prevent development rather than to

protect demonstrably special local green spaces that have a particular local significance. The NPPF is clear that these should not be extensive tracts of land and each of the areas designated in this policy could be considered as extensive tracts of land. We therefore consider that this policy should be deleted as the land designated as Local Green Space to be inconsistent with requirements set out in paragraph 100 of the NPPF.

## **CP1 – Housing mix**

### Housing mix

Part a) of the policy does not provide the necessary flexibility to for site sot respond to the market. The Council's evidence as established in the SHMA provides a snapshot in time of needs for the Borough as a whole. The Council should look to ensure this broad level of mix I achieved but it must also recognise that different sites in different areas will be seeking meet more specific needs and demands. It is therefore important to allow the developer to define the mix of development on that site with regard to the broad evidence of need but without the expectation that the mix should be reflected. We would therefore suggest that part a) is amended as follows:

*“In order to deliver sustainable, mixed and balanced communities, the Council will expect all applications for new housing ~~housing developments (both market and affordable)~~ to ~~incorporate a range of dwelling types, tenures and sizes~~ that reflect and respond to consider the most up-to-date evidence of housing needs and demands.”*

### Adaptable homes

This policy requires all of new affordable and market housing on schemes of more than ten dwellings to meet Building Regulations requirement M4(2) for accessible and adaptable homes. The HBF is supportive of providing homes for older and disabled persons, however, it is essential that where local plans seek to apply the optional technical standards they are fully justified. This situation was clearly established in the Written Ministerial Statement dated 25th March 2015 which stated that *‘the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG’*. Therefore, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG.

PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Worthing which justifies the inclusion of optional higher standards for accessible and adaptable homes.

However, the HBF does not consider that there is a justification for all homes to be built to part M4(2) and 10% to Part M4(3). We could not find sufficient evidence to support part c of this policy and as such suggest that it be deleted. With regard to M4(2) we recognise that there is an ageing population within the Borough. However, given that this is the same for all Boroughs across the Country this cannot be considered sufficient to require all new homes to be built to this standard. If it were the Government would not have made this an optional technical standard. We would suggest that a more appropriate way of meeting the needs of older people is by identifying specific opportunities to meet the needs of the ageing population rather than hoping to meet needs through the optional technical standards.

We would also suggest that part b of this policy be deleted as it does not serve a clear purpose as is required of policies under paragraph 16 of the NPPF.

### **CP3 – Affordable housing**

We could find no up to date viability evidence to support the approach to affordable housing set out in this policy. The 2018 NPPF places more weight on ensuring that the viability of development is established at the plan making stage. There is clear drive by Government to have less negotiation on a site by site basis in relation to affordable housing and as such policies must not be set at the margins of viability and allow for a greater degree of uncertainty with regard to the cost of delivering new development. Council's will need to ensure that the majority of development will not be made unviable by the cumulative impact of the policies in the local plan. Without a viability study we therefore cannot state whether this will be the case for Worthing. Given the approach to the viability of local plans set out in paragraph 57 of the NPPF we would suggest that the Council carefully considers its viability evidence and whether or not this is reflected by its policies in the local plan.

Part d of this policy should be deleted. The distribution of the affordable housing on a site and its appearance should not be dictated by the Council. Given that the return from an affordable unit is significantly less than from the market housing it's the appearance may well differ from that of the market housing being provided. Indeed, on some sites the developer of those homes may well differ if a site is being developed in partnership with a registered provider. We do not consider there to be any justification for this policy.

### **Conclusion**

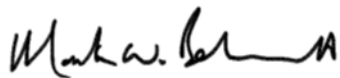
At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:

- Plan period is inconsistent with national policy
- The plan does not meet housing needs and has not identified using the duty to co-operate how these needs will be met;
- Restricts potential for development through the inappropriate designation of local green gaps and local green space.
- Policy on housing mix does not offer sufficient flexibility

- Insufficient evidence to support the requirement for all homes to be built to part M4(2) and 10% to part M4(3);
- Until an up to date viability assessment has been published it is not possible to consider the affordable housing policy to be justified.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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