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Dear Sir/ Madam

**Response by the Home Builders Federation to the Thurrock Local Plan issues and options (stage 2) consultation**

Thank you for consulting the Home Builders Federation (HBF) on this second stage of the Thurrock issues and options consultation. 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 Thurrock 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 (Question 7)**

National policy establishes that the standard methodology is the minimum number of homes that a local authority needs delivery through its local plan. Other considerations such as the delivery of affordable housing, growth deals and infrastructure provision could all lead to the Council adopting a higher housing requirement. Therefore, if the Council is looking to support the economic growth of the area it will be essential that it considers the number of homes, it needs to ensure that growth is sustainable. This will be even more pressing given that those areas surrounding Thurrock are struggling to prepare plans that meet their own housing needs and as such are unlikely to deliver the additional housing to support economic growth within Thurrock.

Given that neighbouring authorities are struggling to deliver new homes it will be important for the Council to also consider whether any needs from neighbouring borough can be planned for within Thurrock. Despite the constraints that present within



Thurrock it is still important to work with its neighbouring authorities to ensure needs across the south Essex area are met. We hope that the slow preparation of plans and improvements in housing supply will be addressed in future through the South Essex Joint Strategic Plan. However, we are not convinced that this will be delivered rapidly and that it may be some time before it is adopted. It is therefore important that the Council works with its partners to ensure needs are met through the local plans that are currently being prepared.

### **Affordable housing (Questions 8 and 9)**

The primary consideration for the Council in setting its affordable housing target is to ensure that it doesn't, in combination with all the other policies in the local plan, compromise the viability of development and ultimately the deliverability of the plan. When considering their position, the Council must be conscious of paragraph 57 of the NPPF which outlines that the assumption is that development that complies with the plans policies are viable. To achieve this high bar will need the Council to ensure that it does not set its policy requirements close to the margins of development viability to ensure the deliverability of the development proposed in its local plan. The Council outline in the consultation document that 35% affordable housing is only viable on green field development. Therefore, in order to ensure the deliverability of the local plan will require the Council to set variable targets with regard to development type and location. A borough wide target would be aspirational and potentially require negotiation in a significant number of development scenarios.

Whilst we welcome the Council decision to consider viability early in the plan and to set its policy on the basis of this evidence rather than its aspirations it will be important that this evidence is updated to reflect any additional costs required as a result of new policies in the local plan. Development viability is sensitive to the cumulative impacts of policies and can lead to a 'death by a thousand cuts' for many developments. In particular it will be important that where high levels of place making are required in local plans then build costs are likely to be higher than the median costs taken from the BCIS. The Council should ensure that all costs being place don development are fully reflected in the viability study.

#### *Tenure mix*

In response to the Council's question 9 on tenure mix with we would support approach c that allows for this to be negotiated on a site by site basis. Tenure mix can have a significant impact on viability of development and as such can be an important factor in achieving the overall level so affordable housing being sought by the Council. Such an approach allows the plan to also be sufficiently flexible to adapt to rapid change which remains, as set out in paragraph 11, a key element of the 2019 NPPF.

### **Optional technical standards (Questions 11 and 12)**

#### *Nationally described space standards*

PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that:

*“where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- *Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”*

The Council therefore require robust justifiable evidence on needs to introduce any of the optional housing standards, based on the criteria set out above. Need is generally defined as ‘requiring something because it is essential or very important rather than just desirable’. We consider that additional space does not necessarily equal improvements in quality. The standards can also, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market. We do not consider that this policy is required, it is considered that local needs can be met without the introduction of the nationally described space standards.

#### *Accessible housing*

Government recognised that it was not appropriate to apply Category M4(2) or M4(3) standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Instead these categories 2 and 3 were made ‘optional’ with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also considering other relevant factors including the impact on project viability.

PPG (ID 56-07) identifies the type of evidence required to introduce a policy for accessible and adaptable homes, 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 Thurrock which justifies the level at which the optional higher standards for accessible and adaptable homes is set.

The evidence highlighted in the consultation document does not justify the need for all homes to be built to part M4(2). Just because a person is over 75 does not mean they will require their home to be adapted in future and even less for those who live in a recently constructed house. It must also be remembered that all new homes 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. As such these base standards for new homes are likely to be suitable for the significant majority of people as they get older. We would suggest that the more appropriate option is to allocate development for specialist accommodation that will truly provide accommodation for older people with specific needs.

### **Self-build housing (question 13)**

We would consider it more appropriate, as suggested in paragraph 57-025 of PPG that the Council engages with landowners to identify sites which can accommodate the demand for self-build plots. As such we would support approach B to question 13. The reason for this approach being preferable is that in our experience where Councils revisit this evidence to test whether those individuals currently on the list are still interested in a plot on which to build their own home the level of demand reduces significantly. This has been the case at the EIP for both the Hart and Runnymede Local Plans. In Runnymede for example more stringent registration requirements were applied in line with national policy and saw the register fall from 155 to just 3. Our concern is that Councils across the country are over-estimating the number of households wanting to build their own homes and that this will leave plots vacant if approach A is taken forward. If the Council still, consider it necessary to require the provision of such plots on residential applications, as set out in approach A, it is important that a mechanism to ensure that where such plots are not sold, they revert to the developer.

### **Location of housing growth**

The HBF cannot make any specific comments as to the potential locations for growth. However, we must stress the importance of ensuring that the approach taken by the Council leads to allocating sites that deliver consistently across the plan period. This will require a range of sites to be allocated from small and medium allocations to deliver early in the plan period to larger urban extension and new settlements that will deliver later on. Such an approach will allow the Plan to establish delivery across the plan

period without resorting to a stepped housing trajectory. It is important that the use of a stepped trajectory should be considered as a last resort and should not be considered an inevitability where the housing requirement changes significantly. Paragraph 3-034 of PPG is clear that it 'may' be appropriate not that it 'will' be appropriate.

#### *Green Belt boundary amendments and sustainable development*

It is clear from the Council's evidence on housing supply and needs that amendments to the Green belt will be required if housing needs are to be met in full and we would agree with the assessment that there are exceptional circumstances to support such amendments. We note that the Council has undertaken an assessment of the Borough's Green belt to identify those parcels of land that are weakly performing against the purposes of this designation as set out in paragraph 134 of the NPPF. Whilst this will be an important tool in considering where development should be located it is also necessary for the Council to consider paragraph 138 of the NPPF which outlines the importance of ensuring that in drawing up new Green Belt boundaries the need to promote sustainable development should be a key consideration. This means that where there is a potential opportunity for sustainable development, and exceptional circumstances have been identified, then the strength with which a parcel of land meets the purposes of Green Belt should not automatically discount a site from allocation.

#### *Delivery on small sites*

The Council will need to identify sufficient small sites to ensure that 10% of housing needs is delivered on sites of no more than one hectare as required by paragraph 68 of the NPPF. It is not evident in this current plan as to whether this key aspect of national policy will be addressed by the Council.

#### **Health Impact Assessments (question 38)**

The HBF does not disagree with the need for local plan authorities to promote health and well-being through their local plans and the provision of quality housing is a key part of this. However, we would suggest that this is for the plan to consider and not for development to consider and account for separately. The policies in the plan with regard to the location of development, their design and the infrastructure needs coming forward over a plan period should be considered through the plan. The principles it sets out for development should achieve improved health and well-being without having to require health impact assessments from development.

#### **Conclusions**

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. As set out above it will be important Thurrock to progress quickly to submission of a new local plan to secure the delivery of the new homes the area requires. Given the pressing need for new homes we are

therefore surprised that the timescales in the plan suggest submission will not occur until September 2022. The Council state that it cannot be submitted until after the adoption of the JSP and the conclusion of the decision-making process on the Lower Thames Strategy. We do not consider it necessary to delay plan making on the basis of these factors. It is vital that plan making progress more rapidly than has been the case for Thurrock. Should you need 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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