

1<sup>st</sup> April 2019

Business Intelligence Officer  
Performance & Business Support  
Department for Place  
Southend-on-Sea Borough Council  
PO Box 6  
Civic Centre  
Victoria Avenue  
Southend-on-Sea  
SS2 6ER

Dear Sir/Madam,

### **Response by Persimmon Homes Essex to the Southend New Local Plan Issues and Options Consultation 2019**

Persimmon Homes welcomes the opportunity to comment on Southend-on-Sea New Local Plan - Issues and Options 2019.

Persimmon Homes are one of the UK's leading builders of new homes with a track record of delivery in the Essex region, including the Boroughs surrounding Southend-on-Sea. Persimmon Homes are a developer with significant experience of market and planning issues in the area, as well as being a future 'user' of the Development Plan.

Persimmon Homes are a Member of the House Builders Federation (HBF), the principal representative body of the house building industry in England and Wales.

It is vital that Local Planning Authorities maintain up to date Local Plans and it will be important for Southend-on-Sea Borough Council (SBC) to move forward quickly and efficiently to submission and then adoption of a new Local Plan that meets housing needs of the Borough in full.

Below are our 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 in the future.

### **Borough Housing Needs**

It has been stated in the Issues and Options that SBC need to plan for between 18,000 and 24,000 new homes over the next 20 years. In light of the Government's recent changes to calculating housing need, it has now been confirmed that Council's should use the 2014-based household

projections. This therefore has a knock-on effect to SBC's emerging new Local Plan and supporting housing need documentation and calculations going forward.

When calculating housing need with the 2014-based household projections, SBC should produce a Local Plan that seeks to deliver a minimum of 1,178 dwellings per annum, equating to 23,560 homes over the next 20 years. It must be remembered however that Paragraph 60 of the National Planning Policy Framework (2018) states that this is a minimum number and that there may be circumstances where the Council's housing requirement may need to be increased. This could be as a result of any needs that cannot be met within neighbouring areas.

## **Spatial Strategy**

It is promising to see that the Council recognise the importance of housing and its link to economic performance through the provision of the right housing in the right place, attracting a wide skills base that then encourages inward investment and thus helping to reduce the current levels of deprivation in the Borough. To this end, SBC must meet its housing needs in full with no shortfall in supply, to ensure the economic prosperity of the Borough.

The Issues and Options document sets out three options for the spatial strategy of the Borough however it is only option No.3 that has the potential to deliver all of the housing needs. It is therefore the option that should be taken forward to further iterations of the Plan.

A multiple pronged approach will be required in order to deliver the housing needs therefore development in specific locations, urban edges on green field, Green Belt land and working with neighbouring authorities to develop a new settlement on Green Belt land will help to deliver this. Given that the administrative boundary is so tightly bound to the urban area of the town, SBC must work closely with Rochford District Council to agree new urban extensions to Southend's existing settlements and look to release Green Belt land.

We therefore welcome the joint working with the Association of South Essex Local Authorities in examining strategic locations for growth. We do stress however that the South Essex Joint Strategic Plan be progressed expeditiously to ensure that all South Essex Authorities are uniform in their housing and development commitments and housing numbers can be delivered across the board. It is therefore essential that Joint Strategic Plan progresses given SBC's need to work with neighbouring authorities, namely Rochford District Council, given its tight administrative boundary and potential for development in the Green Belt.

It is a risk however that in not meeting the housing needs the issues facing the Borough (mentioned above) will not only continue, but worsen, also impacting other South Essex Authorities. It is therefore essential that option three is pursued and expanded further to seek multiple avenues for housing delivery.

## **Housing Type**

With regards to National Space Standards, the Government confirmed that the enhanced standards are optional and they would only be needed and viable in certain local circumstances. Otherwise, they would have been made mandatory. The enhanced standards were introduced on a 'need to have' rather than on a 'nice to have' basis and policy safeguards were put in place.

The standards can only be introduced via a new Local Plan and to do so, clear evidence of need has to be demonstrated and the impact upon viability has to be considered.

Where a need for internal space standards is identified in future iterations of the Local Plan, SBC must provide justification for requiring internal space policies. They 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; and*
- *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 guidance effectively sets out three stages which must be overcome to ensure the Nationally Described Space Standards are only applied where needed and impacts are fully considered.

## **Affordable Housing**

The principle consideration in setting an 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 undermine deliverability of the Plan.

SBC need to be mindful of Paragraph 57 of the NPPF which outlines that the assumption is that development that complies with the Plan’s policies are viable. This will need to be evidenced. There is a danger of setting policy requirements too close to the margins of development viability, threatening the deliverability of housing. Therefore, in order to ensure the deliverability of the Local Plan SBC should look at setting variable targets with regard to development type and location.

It will be important that SBC’s evidence on viability is updated to reflect costs required as a result of new policies in the Local Plan. The Council should ensure that all costs being placed on development are fully reflected in the viability study.

## **Community Services and Infrastructure**

Questions set by SBC within chapter eight have regard to the delivery of some infrastructure elements through provisions in new developments. If it is proposed that infrastructure will be delivered in this way then SBC must ensure that consideration is given to the cumulative impacts of all of the Local Plan policies on development viability. If developments are expected to provide a high level of affordable housing, Community Infrastructure Levy tariffs, increase technical standards, energy efficiency and infrastructure provision, this will cumulatively raise the cost borne by the developer and impact upon the development’s viability and prospects of being delivered.

The danger of this is highlighted in Paragraph 34 of the NPPF where it is stated that Local Plan policies should not undermine the deliverability of the Plan. The Council must consider this balance in future iterations of the Plan.

## **Conclusions**

It is vital that SBC prepare a Local Plan for publication and consultation under Regulation 19 of the Town and Country Planning Regulations as soon as practically possible.

Option three stated in this Issues and Options document appears to be the only option in which the full housing need is met and is therefore the only option that can be taken forward. The Council should ensure that the Plan also includes a five year housing land supply plus sufficient buffer to reduce the risk of under delivery.

It is recognised that for this option, collaboration will be required with Rochford District Council and other South Essex Authorities in order to deliver the Borough's housing needs in full, however this must be undertaken openly and efficiently to ensure the best outcome is reached.

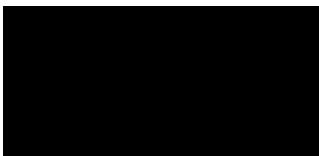
We do stress that the South Essex Joint Strategic Plan be rapidly progressed to ensure that all South Essex Authority's housing numbers can be delivered across the board. It is also imperative that the Joint Strategic Plan progresses for SBC given their need to work with neighbouring authorities to meet their housing requirements however they should not allow delays in the Joint Strategic Plan to impact upon the production of their Local Plan.

As well as this, the Council must ensure that they do not rely on developments providing increased technical standards and significant amounts of infrastructure otherwise running the risk of impacting upon the development's viability and prospects of sites not being delivered. Care must be taken to ensure that Local Plan policies do not undermine the deliverability of the Plan.

Taking the Plan forward, it will be important to undertake the necessary suite of technical studies so the Council can make informed choices. The next iteration of the Local Plan will need to crystallise the delivery of the Borough's housing targets, detail spatial options and suggest the Council's preferred spatial strategy based on the evidence.

Persimmon Homes looks forward to continued involvement in the Plan making process.

Yours faithfully



**Planner, Persimmon Homes Essex**