

Sent by email to: [localplan@castlepoint.gov.uk](mailto:localplan@castlepoint.gov.uk)

03/02/2021

Dear Sir/ Madam

**Response by the Home Builders Federation to the consultation on the main modifications to Castle Point Local Plan**

Thank you for consulting the Home Builders Federation (HBF) on the main modifications to the 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.

**MM5**

Modification is unsound as it is inconsistent with national policy

The Council left the inspector in a difficult position with regard the plan period and whilst the HBF recognises the importance of having a local plan in place it is also important to ensure the local plan is consistent with national policy. As such the proposed modifications in MM5 to policy HO1 cannot be considered to be sound as the modifications continue to refer to a plan period that ends in 2033. Paragraph 22 of the NPPF states that strategic policies, such as HO1, should look ahead at least 15 years from the point of adoption. The proposed modifications to HO1 should therefore be amended to extend the period over which housing needs are assessed to 2037.

**MM7**

Modification is unsound as it is not effective

In order to be considered effective the proposed modification to paragraph 9.29 should make reference to annual monitoring reports and evidence of demand in the local market as well as the SHMA with regard to establishing the most appropriate mix of housing on any particular site. It is important to recognise that the SHMA only provides a snap shot in time and that other data may be necessary in the consideration of housing mix. Such monitoring provides the most up to date evidence on the mix of homes being provided in an area and ensures that decision making can respond to what is being delivered. The HBF would therefore suggest the final sentence of paragraph 9.29 be amended to read:



*“To remain flexible and reflect changes in local market factors the Council will take account of the most recent SHMA outputs, annual monitoring reports and other relevant evidence on housing demand to determine the appropriate mix of housing.”*

Yours faithfully

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

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