

P18-0555/PA

2nd 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

**Southend-on-Sea New Local Plan Issues & Options Consultation
Representations on behalf of Taylor Wimpey**

I write on behalf of Taylor Wimpey in response to the current Southend-on-Sea New Local Plan Issues & Options consultation (April 2019).

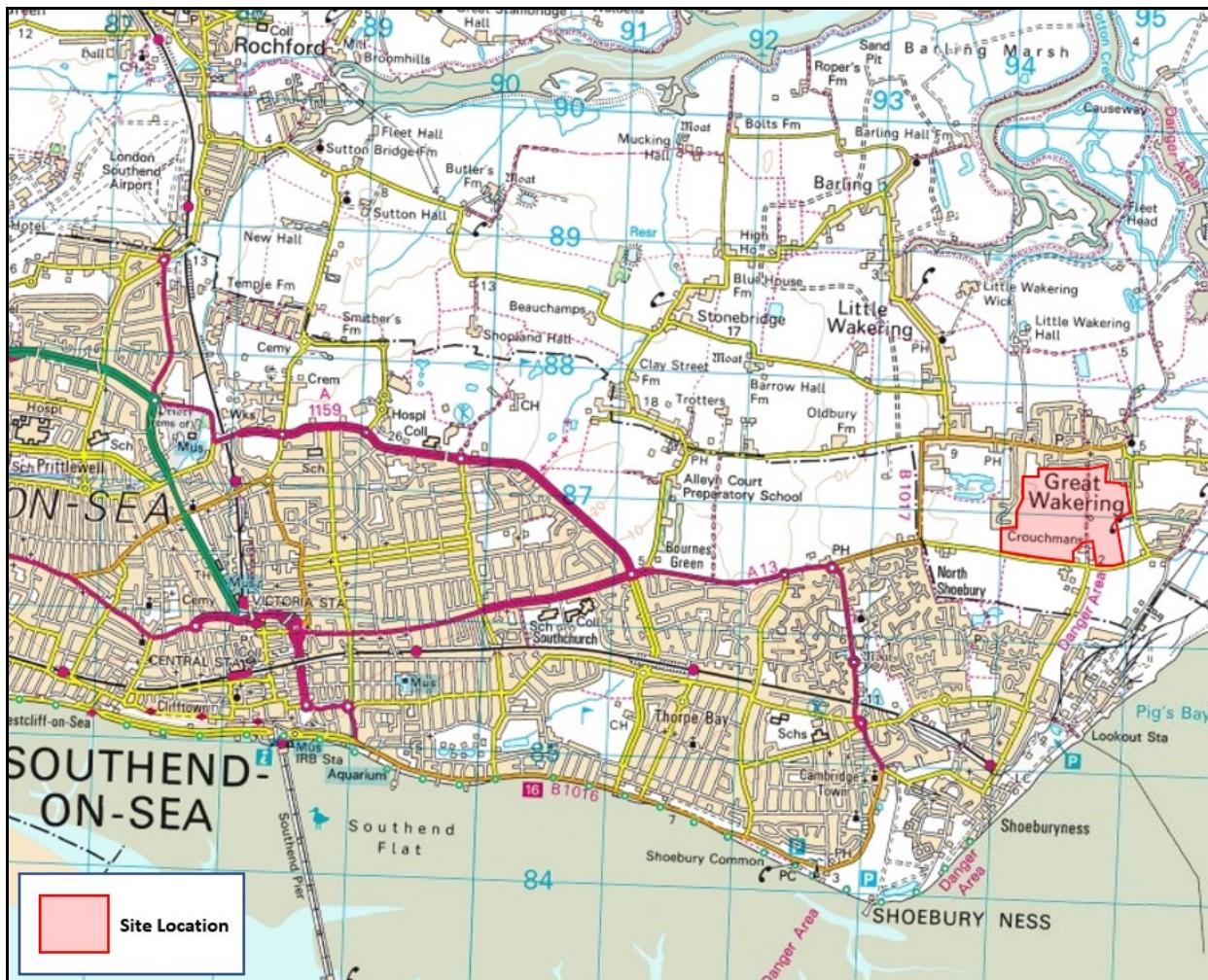
Taylor Wimpey is one of the UK's largest housebuilders and will be an important partner in the delivery of Southend-on-Sea Borough Council's (SBC) spatial and strategic objectives as set out within the emerging Local Plan. Taylor Wimpey is keen to work closely with SBC and the wider South Essex Sub-Region to deliver much needed new housing and infrastructure and to contribute towards the objectives of the emerging New Local Plan and South Essex Joint Spatial Plan.

The following representation seeks to respond to the questions raised by the current New Local Plan Issues & Options consultation, particularly in respect of the amount of growth required and the distribution of development over the next Plan period.

In particular, these representations are written in respect of Taylor Wimpey's interests at Land South of Great Wakering, on the north-eastern edge of SBC but located within neighbouring Rochford District Council, as identified in Figure 1 below, and which represents a viable opportunity to deliver a high-quality development of approximately 1,100 much needed new homes.



Figure 1: Land South of Great Wakering



A copy of Taylor Wimpey's representations submitted to Rochford District Council's Issues & Options consultation (March 2018) are also enclosed at Appendix 1 for SBC's consideration.

The following representations are structured as follows:

- SBC's Objectively Assessed Housing Needs and Anticipated Housing Supply;
- Consideration of the Proposed Spatial Options; and
- Summary and Conclusions

SBC's Objectively Assessed Housing Needs and Anticipated Housing Supply

Housing Need

As acknowledged by the Government's Housing White Paper (2017), the Government recognises that the housing market in England is "*broken and the cause is very simple: for too long, we haven't built enough homes*".

Accordingly, the National Planning Policy Framework (2019) highlights that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay (NPPF, paragraph 59).

To determine the minimum number of homes needed, the NPPF requires that strategic policies should be informed by a local housing need assessment, conducted using the 'Standard Method' in national planning guidance, unless exceptional circumstances justify an alternative approach, which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for (NPPF, paragraph 60).

Accordingly, LPAs should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (NPPF, paragraph 65).

According to the Government's 'standard methodology' for calculating housing need, SBC has an identified need of between 909-1,176 new homes per annum, which over the proposed 20-year plan period equates to between approximately 18,000-24,000 new homes.

The identified objectively assessed housing need for SBC correlates to the findings of the South Essex Housing Needs Assessment (SHMA, 2016) which identified an annual objectively assessed need of 1,072 dwellings per annum (total of approximately 21,500 new homes over the next plan period).

With SBC's historic rate of development since 2001 being 340 dwellings per annum, the standardised methodology represents a significant uplift in annual housing completion rates, requiring over three times past historic rates of development to achieve the objectively assessed higher range need.

Moreover, the NPPF continues that in order to maintain the supply of housing, Local Planning Authorities (LPAs) should monitor progress in building out sites which have planning permission. Where the 'Housing Delivery Test' indicates that delivery has fallen below 95% of the LPAs housing requirement over the previous three years, the authority should prepare an action plan in line with national guidance, to assess the causes of under delivery and identify actions to increase delivery in future years (NPPF, paragraph 75).

As such, it is important to note that the Government's 2018 Housing Delivery Test, published in February 2019, highlights that SBC has delivered just 49% against adopted housing targets in the last 3 years. Therefore, in line with national planning guidance, it is appropriate to apply a 20% buffer to SBC's 5-year housing land supply requirements also.

Meeting objectively assessed housing needs therefore represents a significant challenge for SBC.

Housing Supply

As highlighted in SBC's Housing Topic Paper (2019), land resources in SBC are already at a premium with the existing urban area having one of the highest urban densities in the UK outside London¹ and the majority of surrounding open land being designated as Metropolitan Green Belt, extending from East London across the South Essex Sub-Region.

SBC's Housing and Economic Land Availability Assessment (HELAA, 2018) indicates that it will not be possible to meet the objectively assessed local housing need within the existing urban area or on land at the edge of the existing built-up area. It will therefore be essential for SBC to work closely with its South Essex neighbouring authorities to identify potential strategic scale development sites.

The HELAA indicates that there is land available for around 5,200 new homes within the existing built-up area of Southend-on-Sea. This figure rises to approximately 10,000 new homes when also considering land at the edge of the built-up area, although as these additional sites are on open space, Green Belt, agricultural and employment land, they would be subject to further review. An analysis of past windfall sites further suggests that around 3,800 new homes may also become available over the next 20 years.

Accordingly, it is evident that SBC will need to look beyond its existing boundaries in order to meet its statutory requirements to meet its significant identified housing needs.

Consideration of the Proposed Spatial Options

As set out above, the scale of the housing challenge needs to be considered in the context of the clear shift at the national level to significantly increase the delivery of new homes necessary in order to 'fix our broken housing market'.

The Issues & Options consultation therefore suggests three Spatial Options for meeting identified housing needs in SBC and the following summarises these options against the anticipated housing supply and demand as highlighted above.

¹ The 2011 Census shows that SBC has the 6th highest density of all UK regions outside London.

Table 1: SBC Spatial Options vs Identified Supply/Demand

| Spatial Option | Description | Anticipated Supply | Objectively Assessed Housing Need | Shortfall / Surplus |
|----------------|--|--|-----------------------------------|-------------------------|
| 1 | All development within existing built-up areas | Approx. 5,200 homes + approx. 3,800 windfall allowance TOTAL = 9,000 new homes | 18,000-24,000 new homes | -9,000 to -15,000 homes |
| 2 | Most development within existing built-up areas with some development on the edge of the built-up areas | Approx. 10,000 homes + approx. 3,800 windfall allowance TOTAL = 13,800 new homes | 18,000-24,000 new homes | -4,200 to -10,200 homes |
| 3 | Option 2 + working with neighbouring authorities to develop a comprehensive New Settlement across Borough boundaries | Approx. 16,000-18,000 homes + approx. 3,800 windfall allowance TOTAL 19,800 – 21,800 new homes | 18,000-24,000 new homes | +1,800 to -2,200 |

Source: Southend-on-Sea Topic Paper 1: Housing (January 2019) & New Local Plan Issues & Options Consultation (April 2019)

As highlighted above, only Option 3 comes close to meeting SBC's legal obligations to meeting minimum objectively assessed needs in the Borough over the next 20 years. However, these figures should also be treated with caution and as a 'best case scenario' on the basis that the (approximately) 4,200 homes located on sites on the edge of the built-up area, and as identified within HELAA (2018) as being available, in fact represents an 'unconstrained' figure. These sites are located on land subject to Green Belt, Open Space, Agricultural and Employment land designations and will require further review through the Local Plan process to determine if and how many of these sites should be taken forward. The current inclusion of all 4,200 homes on these 'edge of settlement' sites within SBC's anticipated housing supply pipeline is therefore considered to be highly optimistic.

As highlighted in Table 1 above, Option 3 also fails to plan for sufficient new homes to meet objectively assessed housing needs at the upper end of the scale (i.e. 1,176 dwellings per annum). This, in combination with the optimistic anticipated supply identified above, indicates that SBC are currently planning for a significant shortfall in housing delivery against identified needs.

The NPPF recognises that the supply of new homes can often be best achieved through planning for larger scale development, such as new settlements and 'significant extensions to existing villages and towns', provided they are well located and designed, and supported by the necessary infrastructure and facilities. But, in so doing, Local Authorities should

make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites and identify opportunities for supporting rapid implementation.

The Issues & Options consultation provides no indication with regards to anticipated timescales for the delivery of the New Settlement proposed by Spatial Option 3, however it can reasonably be anticipated that any such proposal for a New Settlement of between 6,000 – 8,000 new homes will necessitate a significant lead-in time before it starts to deliver new homes 'on the ground' (i.e. 10-15+ years after adoption of the New Local Plan and not before 2032 based on the current Local Plan timetable). Moreover, it can further be anticipated that any such New Settlement will likely deliver the majority of its housing requirement towards the end of the next plan period and even into the following plan period beyond 2038.

There is therefore a pressing need to identify how objectively assessed housing needs can be met and whilst the South Essex Authorities Joint Spatial Plan will go some way to help facilitate the delivery of the proposed New Settlement, there remains a need to deliver an increased number of new homes in the interim. As SBC cannot identify a sufficient supply of new homes on land within its own boundaries and the delivery of the New Settlement is likely to extend beyond the next plan period to 2038, it is considered that a Fourth Spatial Option is therefore required to address the unmet housing needs arising in the interim period.

As such, a fourth Spatial Option should include the implementation of all of the proposed Options (1, 2 & 3) in addition to working closely with SBC's neighbours through the 'Duty to Cooperate' to consider all suitable and deliverable/developable sites beyond its boundaries, including Land South of Great Wakering, in order to help meet SBC's unmet housing needs. Such an approach would help to ensure a sufficient amount and variety of land can come forward for development at the right time and in a location close to Southend-on-Sea where it is most needed, to contribute towards SBC's and neighbouring Rochford District Council's (RDCs) significant identified housing needs.

Summary and Conclusions

The above representations, submitted on behalf of Taylor Wimpey, seeks to respond to the questions raised by SBC's New Local Plan Issues & Options consultation (April 2019), particularly in respect of the amount of growth required and the distribution of development over the next plan period to 2038.

In particular, these representations are written in respect of Taylor Wimpey's interests at Land South of Great Wakering, on the north-eastern edge of SBC and located within neighbouring Rochford District Council, which represents a viable opportunity to deliver a high-quality development of approximately 1,100 much needed new homes.

In light of the above findings in respect of significant identified housing need, the insufficient availability of land within SBC's boundaries to accommodate required growth and the significant lead-in times associated with the delivery of the proposed New Settlement, it is concluded that a further Spatial Option is required whereby SBC should work closely with its

near neighbours, including RDC to consider all suitable and deliverable/developable sites beyond its boundaries, including Land South of Great Wakering.

Taylor Wimpey wishes to reaffirm its commitment to working closely with SBC in the preparation of the emerging Local Plan and wider South Essex Joint Spatial Strategy to ensure a positive planning policy position for their land interests is taken forward to deliver real benefits for the local communities of both SBC and RBC.

I trust the above is of assistance and that SBC will take these representations into account in preparing the New Local Plan. If you should have any queries in relation to the above, then please do not hesitate to contact me.

Yours faithfully

Pegasus Group

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Enc.

Appendix 1: Rochford Local Plan Issues & Options Representations (March 2018)

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PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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ROCHFORD NEW LOCAL PLAN

ISSUES & OPTIONS REPRESENTATIONS

LAND AT GREAT WAKERING

ON BEHALF OF TAYLOR WIMPEY

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APPENDICES:

APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: PLANNING POLICY, ENVIRONMENTAL, HERITAGE, FLOOD RISK AND PUBLIC RIGHTS OF WAY (PROW) MAPS

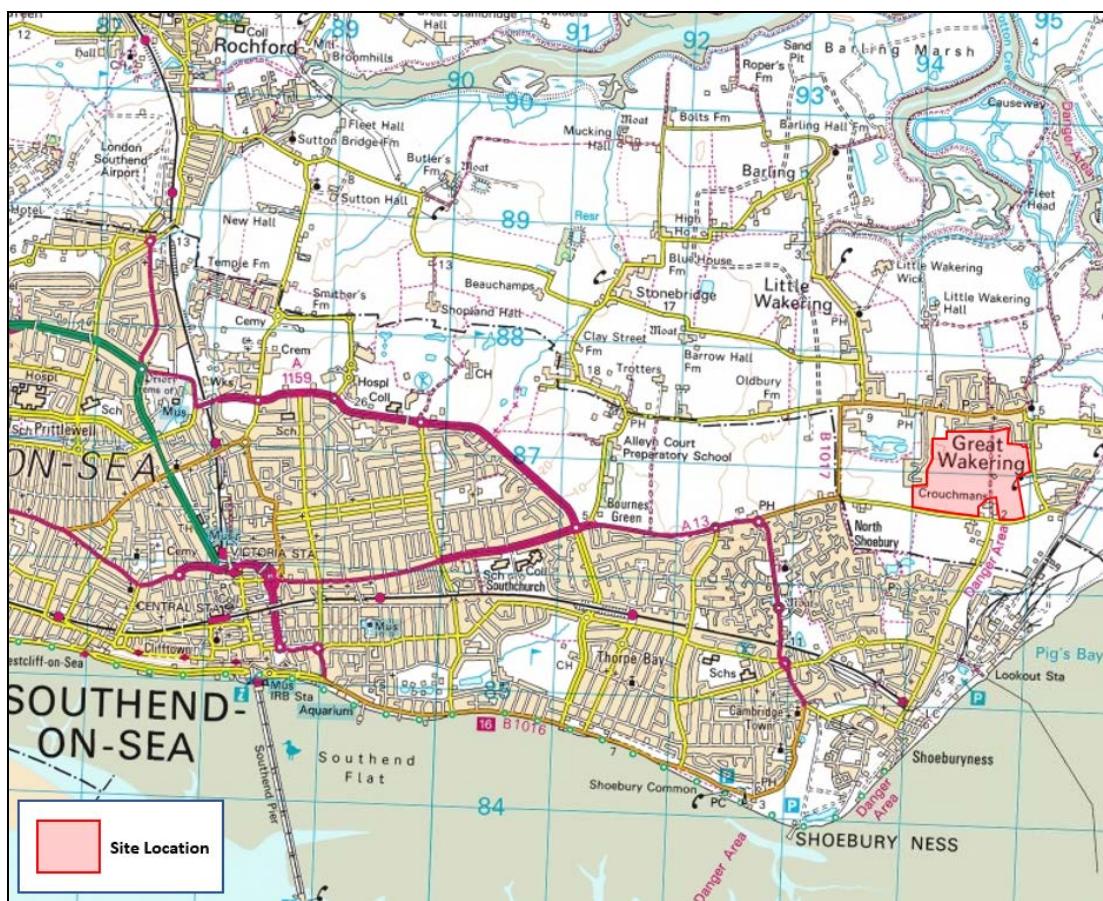
1. INTRODUCTION

- 1.1 This Report has been prepared by Pegasus Group on behalf of Taylor Wimpey in respect of 'Land at Great Wakering', Essex.
- 1.2 These Representations are submitted in response to the current consultation by Rochford District Council (RDC) on the 'New Local Plan Issues & Options Consultation' (December 2017) which seeks to identify the strategic spatial vision for the District for the next 20 years (2017-2037).
- 1.3 The purpose of these Representations is primarily to respond to questions raised within the Issues & Options consultation, particularly in respect of the amount of growth required and the distribution of development over the next Plan period, and seeks to set out the case for a revision to the Green Belt boundary to remove Land at Great Wakering from the Green Belt alongside the provision of a strategic site-specific policy that allocates the site for **residential development** in the emerging Local Plan.
- 1.4 The representations highlight the site is deliverable (suitable, available and viable) and offers the opportunity to accommodate a high-quality development of approximately 1,100 new homes.
- 1.5 In response to the questions posed by the Issues & Options consultation, this Report is structured as follows:
 - **Section 2** considers the site, surroundings and suitability;
 - **Section 3** considers the strategic policy context;
 - **Section 4** outlines the District's housing needs;
 - **Section 5** assesses the site against Green Belt purposes;
 - **Section 6** summarises the relevant procedural considerations;
 - **Section 7** responds to specific questions raised by the consultation; and
 - **Section 8** sets out the case for exceptional circumstances and concludes the report.

2. SITE, SURROUNDINGS AND SUITABILITY

- 2.1 The Site extends to approx. 127 acres / 51 hectares, located on the southern edge of Great Wakering, as shown in **Appendix 1**.
- 2.2 The site is located in the south-east of the District, directly to the south of Great Wakering. Southend Victoria Railway Station is located approximately 6.2km to the west of the site; Southend Airport is located approximately 7.5km to the north-west and the Essex coastline is located approximately 1.1km to the south-east of the site as shown in Figure 1 below.

Figure 1: Land at Great Wakering in Context



- 2.3 Despite its close proximity to London, Rochford is a predominantly rural District with 74% of the Borough designated at Green Belt.
- 2.4 Figure 2 below highlights the relationship between the site and its immediate surroundings.

Figure 2: The site and immediate surroundings



- 2.5 The site comprises agricultural (arable) land, with intermittent trees and hedgerows on all sides, with built form associated with Great Wakering, including residential properties adjacent to the north, east and western boundaries. The Great Wakering Primary School adjoins the north-western corner of the site and an existing farm and associated buildings is located to the south and partially dissects the site.
- 2.6 The site is bound by Poynters Lane to the south and Shoebury Road to the east, with the built extent of North Shoebury situated approximately 600m to the west and Shoeburyness approx. 425m to the south.

Site Deliverability

- 2.7 Critical to the case for development at this site is demonstrating deliverability in order to confirm that the site is capable of contributing towards the District's identified development needs.
- 2.8 Table 1 below provides a summary of the site's suitability to accommodate development, indicating the local planning policy, environmental, heritage and flood risk designations of relevance to the future potential of the site and in particular, highlights the lack of constraints affecting the site. Extracts of the relevant policy maps are enclosed at **Appendix 2**.

Table 1: Site Characteristics

| Characteristic | Details |
|---|--|
| Existing Use | Agricultural (arable) farmland |
| Green Belt | Yes |
| Neighbouring land uses | Residential and community land uses to the north, east and west; Agricultural (arable) land to the south. |
| Flood Zone | Primarily located in Flood Zone 1 (lowest probability) with a small area of the site within Flood Zone 2 & 3 in the south-east corner. Given the size of the overall site, it is envisaged that any future scheme can be designed around this and provide suitable flood risk mitigation. |
| Public Rights of Way | Yes A single PROW runs through the centre of the site in a north-south direction. |
| Area of Outstanding Natural Beauty (AONB) | No |
| Upper Roach Valley Landscape Character Area | No |
| Contamination | No |
| Conservation Area | No The Great Wakering Conservation Area is located |

| | |
|---|--|
| | approximately 100m to the north of the site beyond intervening existing residential properties. |
| Listed Buildings | No The Great Wakering Conservation Area (approx. 100m to the north) contains a number of Listed Buildings |
| Area of Archaeological Importance / Area of High Archaeological Potential | No |
| Scheduled Monument | No |
| Historic Parks & Gardens | No |
| World Heritage Site | No |
| Sites of Special Scientific Interest (SSSI) | No The Foulness Coast SSSI is located approx. 400m to the south-east at the closest point |
| SSSI Impact Risk Zone | Yes Associated with the Foulness Coast SSSI |
| National / Local Nature Reserve | No |
| RAMSAR Site | No The Foulness Coast RAMSAR is located approx. 400m to the south-east at the closest point |
| Special Area of Conservation | No The Essex Estuaries SAC is located approx. 1km to the south-east at the closest point |
| Special Protection Area | No The Foulness Coast SPA is located approx. 400m to the south-east at the closest point |
| Site of Nature Conservation Importance | No |
| Ancient Woodland | No |
| Sustainability | The site is located directly adjacent to Great Wakering which is identified as a Second Tier |

| | |
|--|--|
| | <p>Settlement within the adopted Core Strategy (2011), which benefits from a reasonable range of social and community infrastructure (services and facilities) and access to public transport.</p> <p>Accordingly, Great Wakering is considered to be a reasonably sustainable location suitable to accommodate additional growth to meet identified housing needs and ensure the future vitality and viability of the town and associated community services.</p> |
|--|--|

- 2.9 As demonstrated in Table 1 above, the site is therefore identified as suitable for development with no insurmountable physical, technical or environmental constraints to development.

Site Availability

- 2.10 The site is under single freehold ownership and comprises open arable agricultural land on the southern edge of Great Wakering.
- 2.11 There are no legal constraints to the availability of the land for development.
- 2.12 The landowner is willing to make the site available for development and Taylor Wimpey (a national housebuilder) is actively promoting the site through the emerging Local Plan.
- 2.13 It is therefore anticipated that subject to the removal of the Green Belt designation, that the site will be available for development within the emerging Plan period.

Site Viability

- 2.14 The site comprises open arable agricultural land (i.e. Greenfield Land) and whilst appropriate mitigation will be required to address potential flood risk and ecological considerations, it is not anticipated that there will be any abnormal costs associated with the development of this site as may be expected on previously developed (brownfield) land.
- 2.15 As such, it is to be acknowledged that the site is wholly capable of delivering the Council's policies, particularly with regards to Affordable Housing provision.

Development Vision

- 2.16 Taking into account the characteristics of the site, it is envisaged that a suitable and deliverable development can be accommodated at the site without reducing

the 'gap' in built-form between Great Wakering and North Shoebury/Shoeburyness to the south and west and allowing for suitable flood mitigation and ecological measures to the south-east.

- 2.17 The promotion of this site assumes that 60% of the site (approx. 30.6ha) will be developable at an average density of 35 dwellings per hectare, equating to a total **potential yield of circa 1,100 new homes**.

Conclusions – Implications for the New Local Plan

- The site is suitable for residential development with no insurmountable environmental, technical or social infrastructure constraints;
- The site is located within a sustainable location, suitable to accommodate new development;
- The site is available for development now and is being actively promoted by a willing landowner and developer;
- Residential development is confirmed to be a viable opportunity at this site; and
- Accordingly, for the purposes of preparing the new Local Plan, the site should be treated as a deliverable source of housing land with an expectation of completions achievable in years 2020-2036)

3. STRATEGIC POLICY CONTEXT

3.1 The starting point for determining the case for development at the site is the National Planning Policy Framework (NPPF), with which the new Local Plan should be in accordance. The section below provides an overview of the key national policy considerations of relevance to the site (which are considered to be focussed on housing and Green Belt matters).

National Planning Policy Framework

3.2 The NPPF (2012) sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local people and their accountable Local Authorities can produce their own distinctive Local Plans, which reflect the needs and priorities of their communities. The NPPF must therefore be taken into account in the preparation of Local Plans and is a material consideration in Planning decisions.

3.3 The NPPF establishes a firmly positive 'pro-development' national policy position, which is underpinned by the 'presumption in favour of sustainable development'. The Government has made it clear that the NPPF represents a significant step-change in national policy.

3.4 The NPPF aims to proactively drive and support sustainable economic development to deliver the homes and infrastructure that the country needs. The NPPF states that every effort should be made to objectively identify and then meet the development needs of an area and respond positively to wider opportunities for growth. It continues that emerging Local Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of residential and business communities.

Housing

3.5 As acknowledged by the Housing White Paper 'Fixing our Broken Housing Market' (February 2017), the Government recognises that the housing market in England is 'broken and the cause is very simple: for too long, we haven't built enough homes'¹.

¹ DCLG Housing White Paper (2017) 'Fixing our Broken Housing Market'

3.6 A key objective of the NPPF is therefore to boost significantly the supply of housing (paragraph 47). In order to achieve this Local Planning Authorities (LPAs) should:

- Use their evidence base to ensure that their Local Plan meets the **full**, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period [our emphasis];
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, LPAs should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land; and
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

Green Belt

3.7 With regards to the Green Belt, the NPPF seeks continued protection of Green Belts (paragraph 17) and states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (paragraph 79). It continues to identify 'openness' and 'permanence' as essential characteristics of the Green Belt.

3.8 Paragraph 80 of the NPPF highlights that the Green Belt serves the following five purposes:

- i) To check the unrestricted sprawl of large built-up areas;
- ii) To prevent neighbouring towns from merging into one another;
- iii) To assist in safeguarding the countryside from encroachment;
- iv) To preserve the setting and special character of historic towns; and
- v) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.9 The NPPF states that Green Belt boundaries should only be altered in 'exceptional circumstances', through the preparation of the Local Plan. At such time, LPAs should consider Green Belt boundaries having regard to their intended

permanence in the long term, so that they should be capable of enduring beyond the Plan period (paragraph 83). The implication of this criteria being that where significant development pressure exists and exceptional circumstances are warranted to develop in the Green Belt, it is considered appropriate for LPAs to seek to remove such sites from the Green Belt through the Local Plan-making process in order that they can deliver sustainable development to meet their identified development needs.

- 3.10 The Government's consultation on a Revised NPPF (March 2018) seeks to define what constitutes 'exceptional circumstances' at paragraphs 135 and 136 as follows:

135. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or updating of plans. Strategic plans should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been demonstrated through a strategic plan, detailed amendments to those boundaries may be made through local policies, including neighbourhood plans.

136. Before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;**
- b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and**
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.**

- 3.11 It is anticipated that the above definitions will be incorporated within a revised NPPF to be published in Summer 2018.

- 3.12 The NPPF (2012) continues that when drawing up or reviewing Green Belt boundaries, LPAs should take account of the need to promote sustainable

patterns of development (paragraph 84). Sustainable patterns of development are not defined in policy. However, this is considered to relate to taking into account a range of additional factors beyond the contribution towards Green Belt purposes. These factors might include local development needs, public transport availability and local highways capacity and accessibility to local services and social infrastructure. With regard to sustainability, it is necessary to recognise the wider and updated context of how sustainable development is defined in the NPPF as set out in paragraph 7 whereby it should contribute towards social, economic and environmental objectives.

3.13 The NPPF reaffirms the definition of Green Belt boundaries, stating (paragraph 85) that when defining boundaries, LPAs should:

- i) **Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;**
- ii) **Not include land which it is unnecessary to keep permanently open;**
- iii) **Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;**
- iv) **Make clear that the safeguarded land is not allocated for development at the present time;**
- v) **Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the Development Plan period; and**
- vi) **Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.**

3.14 The NPPF also carries forward previous Green Belt policy regarding 'inappropriate development', which is by definition, harmful to the Green Belt and should not be approved except in Very Special Circumstances' (VSC's) (paragraph 87). Accordingly, when considering any planning application, Local Planning Authorities should ensure that substantial weight is given to any harm to the Green Belt and VSC's will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

3.15 In summary, the NPPF and anticipated revisions to the NPPF, supports the long-standing principles of Green Belt protection, whilst acknowledging that the

objectives of the planning system continue to evolve, reflecting current land use pressures and social needs. The Government's priority is to deliver growth and sustainable development through harmonising, wherever and whenever possible, the social, economic and environmental processes that deliver sustainable places. Policy also reinforces the plan-led system which gives planning authorities the power to undertake Green Belt reviews to help inform the emerging spatial strategies necessary in order to meet development needs. The role and function of the Green Belt therefore needs to be considered within this overarching context to assist in the delivery of sustainable development.

Conclusions – Implications for the New Local Plan

- The Local Plan should identify (allocate) a supply of specific developable sites to meet RDC's objectively assessed housing needs in full as far as is consistent with the policies of the NPPF; and
- In preparing the new Local Plan, RDC should consider revising Green Belt boundaries consistent with the policies of the NPPF in the context of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test.

4. HOUSING NEED

- 4.1 The Housing White Paper (February 2017), the NPPF (2012) and the accompanying National Planning Practice Guidance (NPPG, 2014) confirms the Government's commitment to boosting housing supply.
- 4.2 Assessing the development needs of RDC and identifying specific and deliverable sites in order to facilitate this is therefore a critical aspect of the Local Plan-making process.
- 4.3 The following seeks to highlight the significant development needs within the District and the associated need to bring forward suitable and sustainable Green Belt sites in order to meet identified housing needs.

Need

- 4.4 The District's objectively assessed need has been investigated as part of the evidence base in support of the new Local Plan. As highlighted above, the NPPF requires the new Local Plan to meet the full objectively assessed needs for the market area, as far as is consistent with the policies set out in the framework.
- 4.5 The South Essex Strategic Housing Market Assessment (SHMA, May 2016) and SHMA Addendum (May 2017) endorsed by the Council through the publication of the Local Plan Issues & Options consultation, identifies the following objectively assessed housing need, including taking account of the shortfall in housing delivery since 2014.

Table 2: RDC Projected Housing Need against Emerging Targets

| Baseline Need | Objectively Assessed Housing Need (SHMA Addendum 2017) | |
|---|--|---|
| | 331 homes per annum (lower end of range) | 361 homes per annum (upper end of range) |
| Baseline need (2017 – 2037) | 6,620 | 7,220 |
| Baseline need (2017-2037) plus shortfall from 2014 | 7,181 (Shortfall of 561) | 7,871 (Shortfall of 651 homes) |

Source: RDC New Local Plan Issues & Options Document 2017

- 4.6 This compares with the adopted Core Strategy (2011) requirement of just 4,750 net additional dwellings in the period 2006 – 2025 (i.e. 250 dwellings per

annum). The above therefore represents a significant increase in housing need which the District is required to meet in full as far as consistent with the policies of the NPPF.

- 4.7 The Council is also right to consider the scale of the housing challenge in the context of the Government's recent consultation on '*Planning for the right homes in the right places (September 2017)*' which amongst its proposals included a standardised methodology for calculating housing need. Using this standardised method generates a **housing need figure of 362 net additional homes per annum (i.e. total 7,240 new homes between 2017 – 2037)**. It is anticipated that the proposed standardised methodology for calculating housing need will be incorporated within a revised NPPF, to be adopted in Summer 2018 and accordingly RDC should be planning for housing delivery in line with the emerging targets to ensure the New Local Plan is consistent with emerging national planning policy.
- 4.8 RDC should carefully consider the significant social implications associated with not meeting objectively assessed / identified needs, which in particular is likely to exacerbate an increasing affordability problem for **all** sections of the community. Not meeting objectively assessed needs is likely to increase pressure on RDC to find affordable homes for young people and families and accommodation for an ageing population whilst also making it harder for local businesses to find and retain employees.

Supply

- 4.9 The relevant supply considerations comprise RDC's historic delivery rates and the identified supply of deliverable housing land as recorded within the Council's Annual Monitoring Reports (AMR) and Strategic Housing and Economic Land Availability Assessment (SHELAA, 2017).
- 4.10 The NPPF requires (paragraphs 159 and 161) that LPA's produce a land assessment which enables realistic assumptions about the availability, suitability and achievability of land to meet identified development needs for the duration of the plan period. The SHELAA (2017) forms part of RDC's core evidence base in support of the new Local Plan which helps identify deliverable land for development against the assessment criteria set out in the NPPF. The SHELAA provides an interim position on identified supply within the District based on the latest published information.

4.11 Accordingly, an important aspect of the SHELAA is to use the results of the site assessments (and existing housing land supply data, site completions and an allowance for windfall development) to produce a housing supply trajectory.

4.12 The SHELAA (2017) concludes at paragraph 7.9 and 7.10 that:

"There is land available in the district which is both suitable and achievable to deliver 935 dwellings, in addition to those sites which already have planning permissions and which therefore already form part of the Council's housing trajectory.

The Council's housing land trajectory, which includes the sites considered as part of this assessment in addition to allocated sites and sites with extant permissions, has found that there is sufficient suitable, available and achievable land to deliver a total of 3,499 dwellings in the district across the next 10 years."

4.13 Accordingly, the following table highlights the inherent shortfall of available (and unconstrained) land to meet the identified housing needs within RDC.

Table 3: Identified Shortfall in Housing Supply against Emerging Targets

| Baseline Need | Objectively Assessment Housing Need (SHMA Addendum 2017) | Identified Need (Standardised Methodology) |
|---|--|--|
| | 331 homes per annum (lower end of range) | 361 homes per annum *upper end of range) |
| Baseline need (2017 – 2037) | 6,620 | 7,220 |
| Baseline need (2017-2037) plus shortfall from 2014 | 7,181 (Shortfall of 561) | 7,871 (Shortfall of 651 homes) |
| Identified Supply | 3,499 | 3,499 |
| Surplus / Shortfall | -3,682 homes | -4,372 homes |
| | | -3,741 homes |

4.14 The Council's own evidence base and consultation document therefore highlights the significant scale of the housing supply shortfall faced by the District and it is therefore appropriate for the Council to consider releasing suitable and sustainable Green Belt sites in the early part of the New Local Plan to contribute towards the District's identified and urgent housing land supply shortfall.

Duty to Cooperate

- 4.15 Following the revocation of Regional Spatial Strategies, the Localism Act 2011 introduced a legal requirement on Local Planning Authorities, County Councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters, including to establish the potential for unmet housing needs to be met by neighbouring local authorities.
- 4.16 The following provides a brief review of the potential for RDC's neighbours to accommodate any unmet housing needs arising from the New Local Plan.
- 4.17 Basildon Borough Council is located to the west of RDC and approximately 63% of its land area is designated as Green Belt, as identified in their adopted Local Plan (1998). The Borough is working towards the submission (final) stage of its plan-making to deliver the new homes the Borough needs as far as possible; however, it has indicated that it may not be able to meet all of its needs within its own boundary.
- 4.18 Castle Point Borough Council, located to the south-west of RDC comprises approximately 56% Green Belt which is tightly drawn around the existing urban areas within the Borough. The Council's proposed New Local Plan (2016) sought to meet a fraction of its need identified in the South Essex SHMA with fewer new homes planned than previously on its Green Belt land. This approach did not meet the legal requirements of the Duty to Cooperate as found by a Planning Inspector in January 2017. As reported within the RDC consultation document, if Castle Point can demonstrate that it is unable to meet all of its housing needs within its own boundaries, it will need to work closely with neighbouring areas such as RDC to identify and agree an approach to delivering any potential unmet need.
- 4.19 Chelmsford City Council located to the north-west of RDC comprises approximately 38% Green Belt, situated at the southern end of the City's administrative area. Chelmsford City has published its Preferred Options version of their Local Plan, which proposes to meet the city's needs in full, plus a 20% buffer to provide flexibility) within its own boundaries. However, Chelmsford falls within a separate housing market area with Braintree, Colchester and Tendring Councils and accordingly any flexibility in housing supply in Chelmsford is likely to be taken up by these authorities in the first instance.

- 4.20 Southend Borough Council is located to the south of RDC and is predominantly urban encompassing the settlements of Leigh, Chalkwell, Westcliff, Prittlewell, Southchurch, Southend, Thorpe Bay and Shoeburyness. The Green Belt encloses the urban areas within Southend and it is anticipated that given its significant constraints, the Borough may be unable to meet all of its identified housing needs within its own boundaries. As with Castle Point, the Borough will need to work closely with other LPAs as part of the Duty to Cooperate to address any potential unmet needs.
- 4.21 Thurrock is located further to the south-west of Castle Point Borough Council, but forms part of the same Housing Market Area (South Essex) and comprises approximately 65% Green Belt. Thurrock is also in the process of preparing its new local plan and identified within its most recent consultation that since 2006, the Borough had under-built by some 6,184 homes against adopted targets. The Borough is clearly struggling to meet its own housing targets and is therefore likely to look to its neighbours to help meet any unmet housing needs.
- 4.22 In summary, RDC's neighbours are all similarly highly constrained by the Green Belt and facing significant challenges in meeting identified housing needs within their own administrative areas. Indeed, where neighbouring Local Authorities have sought to 'duck' their responsibilities in terms of meeting their identified needs by relying on neighbouring authorities to pick up the shortfall without proper cooperation in place, such plans have been found 'unsound' by an Independent Planning Inspector and their Local Plans withdrawn.
- 4.23 Accordingly, it is considered unrealistic for RDC to rely on its neighbours to help meet any unmet development needs as its neighbours are similarly highly constrained by Green Belt, are already making provision to accommodate other authorities' unmet housing needs and are facing their own significant challenges in meeting identified needs.
- 4.24 In summary, it is not appropriate for RDC to rely on its neighbours under the Duty to Cooperate to accommodate any unmet housing needs.

Conclusions – Implications for the New Local Plan

- The new Local Plan should identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the District's objectively assessed housing needs (i.e. a minimum of 7,181 net additional homes) as far as is consistent with the policies of the NPPF;

- Insufficient non-Green Belt sites exist to meet housing needs in full and therefore it is appropriate to identify additional deliverable, suitable and sustainable Green Belt sites to contribute towards identified housing need;
- Given the scale of the identified shortfall in housing land supply against identified needs, the new Local Plan should identify an additional supply of land from suitable and sustainable Green Belt sites to come forward in the early part of the Local Plan period, in order to deliver the Council's sustainable development objectives; and
- It is not appropriate for RDC to rely on the 'Duty to Cooperate' and its neighbours to accommodate any unmet housing need as neighbouring Local Authorities are similarly highly constrained by Green Belt and facing similar challenges in meeting their own identified housing needs.

5. GREEN BELT MATTERS

- 5.1 The following section seeks to demonstrate that the site is suitable to contribute towards the development needs identified in Section 4 above in respect of the Green Belt which represents the key Planning Policy constraint against the development of Land at Great Wakering.
- 5.2 The Green Belt designation carries significant weight as a material consideration in planning policy and development management. The NPPF is explicit that changes to Green Belt designations should only be altered in exceptional circumstances through the Local Plan process (paragraph 83), in the context of promoting sustainable development as set out in the NPPF (having regard to social, economic and environmental factors).
- 5.3 As highlighted in Section 4, there is an inherent shortfall in available (and unconstrained land) to meet identified housing needs. Moreover, the Council's 'Environmental Capacity Study (2015)' identifies that based on the lower South Essex SHMA (2013) figure of 240 new homes per year between 2026 – 2031 (total 1,200 new homes), i.e. beyond the current plan period of the Core Strategy, it is uncertain as to whether the District has the environmental capacity to accommodate this level of growth; and is unlikely to be able to accommodate additional homes from other areas. The study identifies the Green Belt as a major constraint to development within the District and recommends a Review of the Green Belt is undertaken.
- 5.4 Within this context it is our view that exceptional circumstances exist to amend the Green Belt boundary in RDC to warrant the release of this site from the Green Belt. The main purpose of this section is to set out an assessment of the 'value' of the site in Green Belt terms in order that the 'harm' of its loss can be appropriately considered.
- 5.5 Key to establishing whether a site is suitable for release from the Green Belt in order to contribute towards the district's objectively assessed development needs is to understand the 'value' of the site in Green Belt terms when assessed against the national purposes of Green Belt set out in the NPPF.
- 5.6 The following therefore provides an assessment of the site's contribution towards the purposes of the Green Belt in order that the potential 'harm' of its loss can be appropriately considered.

Green Belt Purpose 1: To check the unrestricted sprawl of large built-up areas

- 5.7 The original purpose of the Metropolitan Green Belt was to restrict the outward expansion of Greater London. In this instance, Southend-on-Sea is also considered to be a 'large built-up area' of interest.
- 5.8 The site is located beyond the relevant built-up areas and intervening development (particularly on the site's western boundary) exists between the areas of North Shoebury and Shoeburyness.
- 5.9 Accordingly, the site cannot be considered to contribute to a wider Green Belt network that provides a strategic barrier against the outward sprawl of large built-up areas.
- 5.10 It is therefore concluded that the site provides limited or no contribution to the first Green Belt purpose.

Green Belt Purpose 2: To prevent neighbouring towns from merging

- 5.11 The site is located on the southern edge of Great Wakering and is bound by intervening development on its western edge and by Poynters Lane to the south.
- 5.12 It is envisaged that a suitable development could be designed at this location to ensure that the existing 'gap' between Great Wakering and North Shoebury and Shoeburyness to the south and west is not reduced, with Poynters Lane ensuring a long-term defensible boundary further to the south.
- 5.13 It is therefore concluded that the site is not capable of acting as a gap or break between two or more definable settlements and therefore is not considered capable of making any contribution to the Green Belt objection of preventing neighbouring towns from merging.

Green Belt Purpose 3: To assist in safeguarding the countryside from encroachment

- 5.14 The site is recognised to be a countryside location on the edge of Great Wakering and accordingly any development at this site will, by necessity, result in encroachment on the countryside. However, it is important to consider a range of factors including land and environmental designations, land uses and urbanising features which may detract from the quality and function of the countryside at this location.

- 5.15 The site is not subject to any statutory or local landscape or ecological designations which might otherwise contribute towards the quality of the countryside at this location. Accordingly, the 'quality' of the landscape is considered to be of limited value.
- 5.16 Moreover, in terms of land uses, the site comprises an arable agricultural field which is enclosed by the existing built extent of Great Wakering to the north, east and west and Poynters Lane to the south. Accordingly, there is a strong urbanising influence on this site detracting from the quality and function of the countryside at this location.
- 5.17 As such, the site is enclosed on all sides by existing built form or significant urban infrastructure and is not considered to represent a contiguous element within the wider countryside due to its effective isolation by existing physical barriers and urbanising features. Furthermore, the site's quality in terms of landscape and ecological designations further detract from the 'value' of the countryside at this location.
- 5.18 Accordingly, it is considered that the site is only capable of having a 'partial' contribution to the third purpose of the Green Belt.

Green Belt Purpose 4: To preserve the setting and special character of historic towns

- 5.19 This purpose of the Green Belt is to perform a 'girdle' role, as a green ring around historic settlements and/or to provide the landscape context to historic features that preserves historic setting by keeping land open.
- 5.20 The Great Wakering Conservation Area is bordered in all directions by existing development that has grown around it as the settlement has expanded and as such the setting of the Conservation Area and the heritage assets contained therein is now predominantly within the wider setting of the settlement rather than the surrounding countryside.
- 5.21 Accordingly, the site is not considered to play a strong role in complementing the setting or special character of the Conservation Area due to the presence of the existing intervening development. It is therefore concluded that the site does not contribute towards the preservation of the historic setting and special character of Great Wakering.

5.22 Consequently, the site is not capable of contributing to the fourth purpose of the Green Belt.

Green Belt Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

5.23 The objective of this purpose is to constrain the supply of development land in order to encourage the recycling of previously developed sites which would not otherwise be developed, and therefore assist in urban regeneration. This objective can only be realised if there is a supply of derelict and other urban land that is capable of being recycled and which is deliverable.

5.24 This purpose of the Green Belt is particularly difficult to quantify but ultimately relies on a supply of suitable brownfield land to meet objectively assessed housing needs. As set out in Section 4, this is not the case. Furthermore, it is considered reasonable to assume that some of this brownfield land will likely be subject to delivery constraints and therefore in practice is unlikely to come forward in the short-term (whether or not this site is removed from the Green Belt).

5.25 Accordingly, in the context of an insufficient supply of deliverable brownfield land to meet housing needs and the resulting requirement to identify suitable alternative sites to accommodate growth, it is confirmed that in practice the significance of the site's contribution towards the fifth Green Belt purpose is limited.

5.26 In summary, the NPPF confirms that the fundamental aim of the Green Belt is to keep land permanently open as a means of achieving its five key purposes. However, when assessing the site against these Green Belt purposes (as summarised in Table 2 below), it is shown to only provide a limited contribution to these stated purposes.

Table 4: Summary of the Site's Contribution to Green Belt Purposes

| Green Belt Purpose | Assessed Site Contribution |
|---|----------------------------|
| 1) To check the unrestricted sprawl of large built-up areas | Limited or no contribution |
| 2) To prevent neighbouring towns from merging | Limited or no contribution |
| 3) To assist in safeguarding the countryside from encroachment | Partial contribution |
| 4) To preserve the setting and special character of historic towns | Limited or no contribution |
| 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land | Limited or no contribution |

5.27 **Accordingly, the value of this site to the Green Belt is therefore considered to be limited and by virtue, any harm arising from its removal from the Green Belt is also limited.**

5.28 In conclusion, the site is therefore considered to be suitable to be taken forward through the Local Plan process to deliver an appropriate scale of development in a sustainable location in order to contribute towards the District's significant identified housing needs.

Conclusions – Implications for the New Local Plan

- In preparing the new Local Plan, RDC should consider revising Green Belt boundaries in the context of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test; and
- The site makes a limited contribution to Green Belt purposes and accordingly the release of the site would not give rise to significant 'harm' in Green Belt policy terms.

6. PROCEDURAL CONSIDERATIONS

- 6.1 The purpose of this section is to provide RDC with comfort that the removal of the site (Land at Great Wakering) from the Green Belt and the subsequent 'strategic' allocation for residential development in the first part of the new Local Plan is the appropriate and proper mechanism for doing so.

Green Belt Review

- 6.2 The NPPF attaches great importance to the Green Belt, highlighting its fundamental aim of preventing urban sprawl by keeping land permanently open (paragraph 79). However, despite its supposed permanence, the Green Belt can be reviewed by Local Authorities through their Local Plan reviews (paragraph 83), which should take account of the 'need to promote sustainable patterns of development' (paragraph 84). That includes the negative consequences of channelling development towards urban areas or to areas beyond the Green Belt rather than existing boundaries. Any changes to the Green Belt should therefore take effect through the Local Plan reviews and then only in 'exceptional circumstances'.
- 6.3 Guidance contained within the NPPF and NPPG in addition to various ministerial statements and correspondence with the Planning Inspectorate, in combination with the growing emphasis on Localism is clear that it is up to Local Authorities to determine planning matters themselves, including the future of their Green Belt. Therefore, if significant benefits associated with meeting local housing needs exist in combination with other local benefits, then the opportunity exists to justify the release of land from the Green Belt for development to ensure that the Green Belt does not become an obstacle to delivering 'sustainable patterns of development' (NPPF paragraph 84) which might otherwise restrict the ability of Local Authorities to best meet the future development needs of their communities.

Strategic Allocations

- 6.4 It is our view that the new Local Plan should set out the strategic levels of development (based on identified needs) to be delivered across the Local Plan area and identify the broad locations where growth/development will take place (to include strategic allocations).
- 6.5 Accordingly, it is logical when reviewing Green Belt boundaries to 'backfill' any released Green Belt land with an appropriate site allocation to provide the

necessary certainty that the Local Authority can deliver the development required to meet its needs and spatial objectives. Moreover, the exceptional circumstances required to release the Green Belt in the first instance will likely not exist unless the benefits associated with any development clearly outweigh the potential harm. The inference being that the Green Belt will not usually be released unless for development purposes. It is therefore considered that the removal of land from the Green Belt and the subsequent allocation for an alternative land use are intrinsically linked.

- 6.6 Such an approach is supported by the NPPF whereby paragraph 157 states that Local Plans should:
- Plan positively for the development and infrastructure required in the area to meet spatial objectives;
 - Indicate broad locations for strategic development on a key diagram and land use designations on a proposals map; and
 - Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.
- 6.7 The above approach to removing and re-allocating Green Belt land as strategic allocations through the emerging Local Plan is therefore the correct approach and is supported at a national level.
- 6.8 In conclusion, it is therefore considered that the implementation of a spatial strategy that identifies Green Belt land for release and which allocates such land for development through a Strategic Allocation within the new Local Plan will enable RDC to plan positively to ensure that the District can deliver the strategic levels of development it needs in line with the requirements of the NPPF.
- 6.9 The consequences of deferring any allocation of the site to the latter stages of the Local Plan would be:
- i) To create a policy void in the interim period creating uncertainty for investment and the delivery of key spatial objectives for the District; and
 - ii) To unnecessarily delay development of a sustainable and deliverable site which can contribute towards the District's housing needs in the early part of the New Local Plan period, which as highlighted above is important in the context that the Council's own evidence base indicates towards an inherent shortfall in available housing land to meet identified needs.

Conclusions – Implications for the New Local Plan

- Guidance at all levels is clear that it is up to Local Authorities to determine where development should and shouldn't go;
- The preparation of a new Local Plan provides the appropriate mechanism to review the Green Belt boundary and release sites for development where this promotes sustainable patterns of development and exceptional circumstances apply; and
- The new Local Plan should plan positively and support the release of the site from the Green Belt and replace with a Strategic Allocation to be delivered in the early part of the new Local Plan to demonstrate that the spatial objectives of RDC can and will be delivered.

7. REVIEW OF PROPOSED LOCAL PLAN APPROACHES

7.1 The following section seeks to draw the above together to provide a succinct response to the key issues and specific questions raised within the Issues & Options consultation, particularly in relation to the amount of growth RDC should plan for over the next plan period and how it should be distributed.

Question SP1.1: How do we sustainably meet our need for market and affordable homes over the next 20 years?

7.2 As set out in Section 4 (Housing Need), the scale of the housing challenge needs to be considered in the context of the clear shift at the national level to significantly increase the delivery of new homes to 'fix our broken housing market'.

7.3 The consultation document suggests three options for meeting identified housing needs, namely:

- **Option A:** Seek to provide as much of the District's housing need within our area, as far as possible, given environmental and other constraints;
- **Option B:** Work with neighbouring Local Planning Authorities to ensure that housing need across the South Essex Housing Market is effectively met; and
- **Option C:** Consider a policy requirement to deliver a percentage of new market homes on schemes to be available to residents on a first-come, first-served basis for a limited period of time

7.4 It is considered that the options presented by the consultation are 'non-committal' to meeting the District's identified housing needs and fail to recognise the scale of the housing challenge, particularly in light of the Council's 'Environmental Capacity Study (2015) which indicates has a very limited capacity to accommodate new growth.

7.5 It is considered that RDC should plan to meet their objectively assessed housing need in full and/or as calculated using the Government's proposed standardised methodology to deliver between 331 – 362 new homes per annum across the new Local Plan period consistent with adopted and emerging national planning policy.

7.6 Moreover, as set out above, it is unrealistic for RDC to rely on the Duty to Cooperate and for its neighbours to meet any unmet need as these authorities are similarly constrained.

7.7 RDC should carefully consider the significant social costs and implications associated with not meeting identified housing needs in full, which in particular is likely to exacerbate an increasing affordability crisis for **all** sections of the community. Should RDC not meet their identified needs in full as the current consultation indicates, then it is likely to increase pressure on the Council to find affordable homes for young people and families and accommodation for an ageing population, whilst also making it harder for local businesses to find and retain employees.

Question SP1.3: How do we plan for and facilitate the delivery of our need for new homes over the next 20 years within the district?

- 7.8 The Issues & Options consultation document presents five approaches for how future growth might be distributed:
- **Option A:** Increase density within the existing residential area;
 - **Option B:** Increase density on allocated residential sites;
 - **Option C:** Several Small extensions to the existing residential area;
 - **Option D:** A number of fewer larger extensions to the existing residential area; and
 - **Option E:** A new settlement.
- 7.9 The consultation document does not provide any estimation of the potential number of new homes each option might deliver, apart from in relation to Option A, whereby the accompanying SHELAA (2017) identifies the potential for 38 sites within the existing urban areas in the District to come forward over the next plan period “which may be appropriate to be considered for the delivery of [just] 935 new homes”.
- 7.10 Accordingly, given the scale of the housing challenge and the inherent shortfall of available and unconstrained housing land to meet identified needs, it is therefore clear that no single ‘approach’ as identified by the consultation will be sufficient to provide all the homes RDC needs in the next Local Plan period. As such, RDC will need to consider a combination of delivery strategies to meet their identified housing needs, including larger extensions to the residential areas.
- 7.11 Accordingly, it is considered appropriate for ‘Option D’ (i.e. a number of fewer larger extensions to the existing residential area), being supported by a review of the Green Belt, to form part of the overall spatial strategy for the next plan period whereby development is distributed across the District according to the sustainability and suitability of sites to accommodate new growth and protect the

Green Belt where the Green Belt meets its stated purposes. This approach provides an opportunity to meet local housing needs where such needs are generated and enables suitable and sustainable sites to come forward in the early part of the new plan period to seek to address the pressing need for new housing (including making up the existing backlog in housing delivery) now.

- 7.12 Such an approach ('Option D') also provides opportunities to improve local infrastructure provision through the careful use of financial contributions from development together with on-site provision of facilities where appropriate to make settlements more sustainable.
- 7.13 Accordingly, allowing settlements to grow sustainably beyond existing boundaries according to their ability to accommodate growth, such as at Great Wakering, as one of the most sustainable settlements in the District, will have positive benefits for the future vitality and viability of the local area and for the sustainability of the District as a whole.
- 7.14 In conclusion, the inclusion of 'Option D' as part of a combination of spatial strategies for meeting the District's identified housing needs is considered to represent a sustainable approach to plan-making to contribute towards RDC's future development needs.

Conclusions – Implications for the New Local Plan

- The new Local Plan should seek to meet identified housing needs in full in recognition of the scale of the 'housing challenge';
- The plan should support the sustainable distribution of development across the District according to the suitability and sustainability of settlements and sites to accommodate growth to ensure the future vitality and viability of settlements and the District as a whole;
- It is appropriate for 'Option D' (i.e. larger extensions that relate well to the existing residential areas), being supported by a review of the Green Belt, to form part of the emerging Spatial Strategy for the new Local Plan; and
- Great Wakering is identified as a sustainable settlement and the site is demonstrated to be suitable for release from the Green Belt and capable of contributing towards the District's identified housing needs.

8. SUMMARY AND CONCLUSIONS

- 8.1 These Representations are submitted on behalf of Taylor Wimpey in support of Land at Great Wakering, in response to the current Local Plan Issues & Options consultation by RDC.
- 8.2 The purpose of these representations has been primarily to respond to questions raised within the consultation in respect of the amount of growth required and the distribution of development over the next Plan period, and seeks to set out the case for a revision to the Green Belt boundary to remove Land at Great Wakering from the Green Belt alongside the provision of a strategic site-specific policy that allocates the site for residential development in the emerging Local Plan.
- 8.3 The site at Great Wakering is deliverable (suitable, available and viable) and offers the opportunity to accommodate a high-quality development of approximately 1,100 new homes.
- 8.4 These representations demonstrate that the promotion of Land at Great Wakering is not exclusive to any one particular 'spatial approach' as set out in the consultation document and instead highlights the site's suitability to contribute towards the District's housing needs in all circumstances (in line with the sustainable development principles of the NPPF), and accordingly sets out the following case for exceptional circumstances to justify a revision to the Green Belt boundary:

i) The Strategic Policy Framework:

- Local Plans should identify (allocate) a supply of specific developable sites to meet objectively assessed needs.
- In preparing a new Local Plan, it is appropriate to consider revisions to the Green Belt consistent with the objectives of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test.

ii) The following development needs exist:

- The District's objectively assessed housing needs identify a need for between 7,181 - 7,871 new homes in the period 2017 – 2037 (i.e. 331 - 362 dwellings per annum).
- Insufficient non-Green Belt sites exist to meet housing needs in full and therefore it is appropriate to identify additional deliverable, suitable and sustainable Green Belt sites to contribute towards identified housing need.
- Given the scale of the identified shortfall in housing land supply against identified needs, the new Local Plan should identify an additional supply of land from suitable and sustainable Green Belt sites to come forward in the early part of the Local Plan period, in order to deliver the Council's sustainable development objectives.
- It is not appropriate for RDC to rely on the 'Duty to Cooperate' and its neighbours to accommodate any unmet housing need as neighbouring Local Authorities are similarly highly constrained by Green Belt and facing similar challenges in meeting their own identified housing needs.

iii) The site is capable of contributing towards identified housing needs on the following grounds:

- Green Belt matters:
 - Where the Green Belt is identified as not meeting NPPF purposes, it is appropriate to review the Green Belt through the Local Plan process.
 - The site makes a limited contribution to the purposes of the Green Belt and therefore it is appropriate for the site to be released from the Green Belt.
- The site is deliverable on the following grounds:
 - The site is suitable for development in terms of:

- Sustainable location;
 - Landscape/townscape;
 - Flood risk;
 - Biodiversity;
 - Heritage; and
 - Social infrastructure – health & well-being.
- The site is available, being promoted by a willing landowner and a willing national housebuilder (Taylor Wimpey) and is therefore available for residential development only; and
 - The site is viable.

iv) Procedural considerations:

- The Local Plan-making process provides the appropriate mechanism for reviewing the boundary of the Green Belt.
- Following the removal of the site from the Green Belt, it is appropriate to ‘backfill’ with the inclusion of a Strategic Allocation in the first part of the new Local Plan (as opposed to subsequent Site Allocations) to avoid a policy vacuum.

v) Proposed Local Plan Approach:

- It is clear there exists an inherent shortfall of available (and unconstrained) land to meet identified housing needs within RDC and that no single spatial strategy will be sufficient to meet identified needs;
- It is appropriate that ‘Option D’ (i.e. larger extensions that relate well to the existing residential areas), being supported by a review of the Green Belt, should form part of the emerging Spatial Strategy for the new Local Plan; and
- Great Wakering is identified as a sustainable settlement and the site is demonstrated to be suitable for release from the Green Belt

and capable of contributing towards the District's identified housing needs.

vi) Exceptional Circumstances:

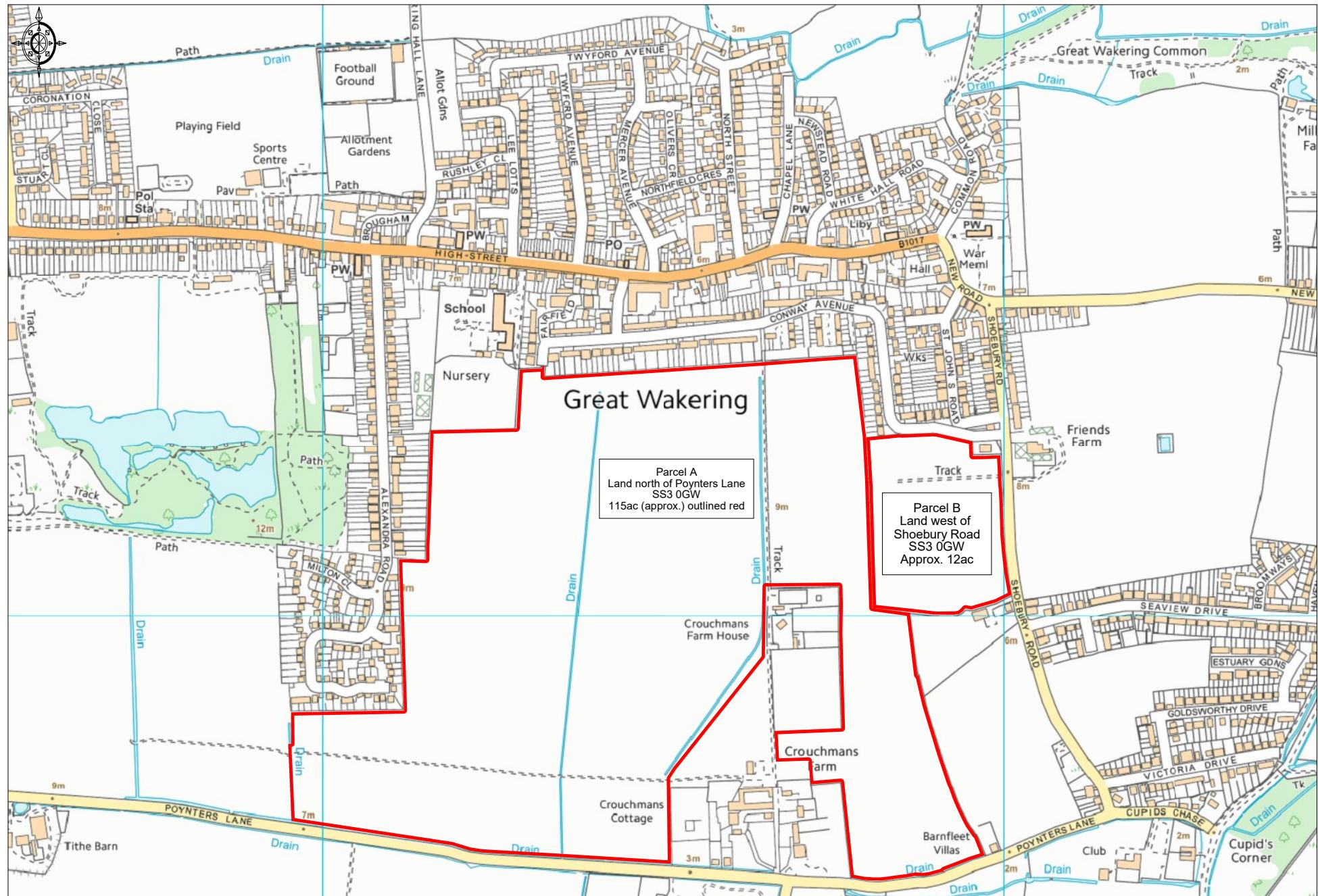
- The combination of the above factors is considered to warrant the 'exceptional circumstances' necessary to justify the release of this site from the Green Belt to deliver the much-needed new homes RDC needs and to contribute towards the sustainable development objectives of the District, balanced with the need to protect the Green Belt where the Green Belt meets its stated purposes.

The Opportunity

- 8.5 In conclusion, the evidence presented within these representations highlights the suitability of Land at Great Wakering to deliver approximately 1,100 much-needed and high-quality new homes consistent with the policies of the NPPF.
- 8.6 The site therefore offers the potential to play a significant role in achieving sustainable patterns of development in the District, sufficient to warrant the exceptional circumstances required to justify the release of this site from the Green Belt.
- 8.7 Taylor Wimpey has a successful track record working with RDC and are keen to continue to work collaboratively with the Council and local stakeholders in the preparation of the new Local Plan to ensure that a positive policy position for the site is taken forward to deliver real benefits for the local community and the District as a whole.

APPENDIX 1

Site Location Plan

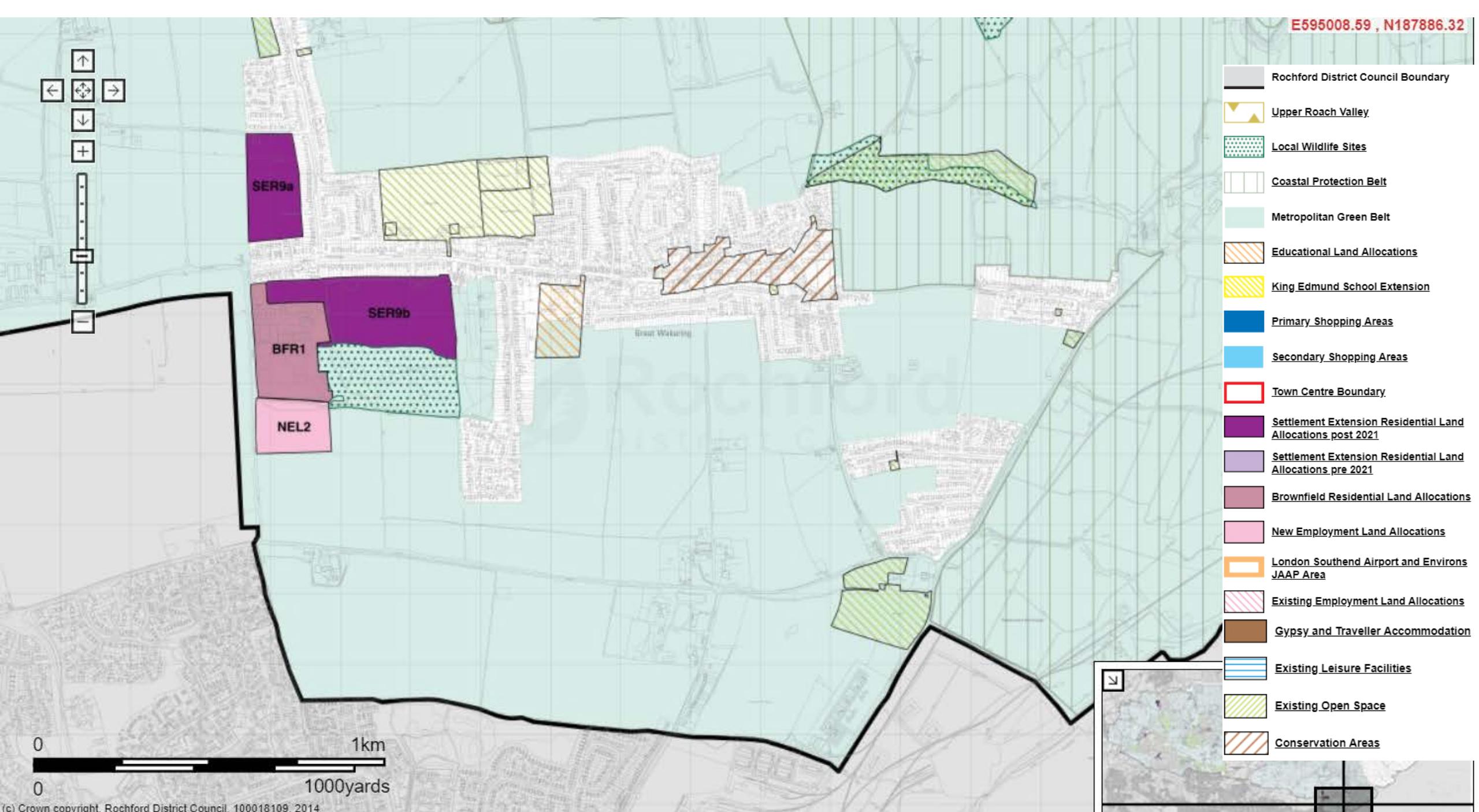


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APPENDIX 2

Planning Policy, Environmental, Heritage, Flood Risk and Public Rights of Way (PROW) Maps

E595008.59 , N187886.32



- Sites of Special Scientific Interest (England) - points
 - Sites of Special Scientific Interest (England)
 - SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)
 - Proposed Ramsar Sites (England) - points
 - Proposed Ramsar Sites (England)
 - ▲ Listed Buildings (England)
 - ▲ Special Areas of Conservation (England) - points
 - Special Areas of Conservation (England)



