

Sent by email to: planningpolicy@southend.gov.uk

26/10/2021

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on spatial options for the Southend Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the spatial options for the Southend 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. Our comments focus solely on the options for spatial strategy as set out in part 2 of the consultation document.

Spatial strategy options for delivering new homes.

2. The consultation documents set out four options with regard to the provision of new homes. These options clearly build on one another to ultimately deliver sufficient housing to meet identified needs. Whilst these are presented as separate options the only sound approach is option D which seeks to meet needs in full though a combination of increasing urban capacity regeneration and green belt release both in Southend and the neighbouring borough of Rochford.
3. What is evident from the options set out by the Council is that there is clearly insufficient capacity from brownfield sites in Southend to meet its housing needs. A combination of increasing urban capacity and facilitating change on a range of other sites within the urban area would see the Council delivering 12,850 homes – a 12,100 home shortfall on its assessment of needs. It is also evident from the recent consultation undertaken by Rochford District Council on its local plan and the examination of the Castle Point Local Plan that urban capacity in those neighbouring areas would be insufficient to address their own needs moving forward. As such in line with paragraph 141 of the NPPF the Council must consider whether there are the exceptional circumstances present to release Green Belt land in order to meet its development needs.
4. As the Council note whilst nature and the extent of the harm to the Green Belt is one consideration with regard to exceptional circumstances it is also important to consider this harm against the acuteness of the unmet development needs in an



area and the consequences on achieving sustainable development if Green Belt boundaries are not amended to deliver additional growth. Finally, if it is considered that there are exceptional circumstances to amend Green Belt boundaries the Council will need assess with the impact of removing land from this designation can be offset through compensatory improvements to environmental quality or access to the remaining Green Belt.

5. Given the tight boundary of Southend to its urban edge there are limited areas in which to release Green Belt and, inevitably, that land is likely to score relatively highly against the purposes of this designation. The Green Belt study indicates that the majority of Green Belt land within Southend meets at least one of the purposes strongly. However, the consequences of not meeting the borough's development needs are also significant and ones that the Council articulate in the consultation document. It is also evident that there are opportunities to mitigate any harm through improvements in access to recreation, the delivery of biodiversity gains from such development and the creation of strong and defensible boundaries.
6. It is important to recognise that Green Belt should not be a barrier to sustainable development. The designation is important in preventing unplanned development but when towns and cities do need to expand Green Belt ensures that it is undertaken in well-planned and effective manner that delivers attractive new communities as well as improvements in local infrastructure, gains in biodiversity and increased access to open spaces. In short, such development will be the antithesis of the unplanned urban sprawl that Green Belt has been so effective in preventing. The HBF therefore considers that the acuteness of the development needs in Southend coupled with clearly negative consequences on sustainable development from not amending Green Belt boundaries are sufficient to justify the amendment of Green Belt boundaries in Southend as set out in option C alongside further amendments in Rochford as suggested in option D.

Deliverable and developable

7. It is important that the development that is allocated through this local plan, and any sites identified to meet the needs of Southend in other areas, is either deliverable or developable. With regard to development in Southend it is clear that delivery in the early years of the plan will come principally from the sites identified through options A and B. However, caution should be given to the early delivery of housing regeneration sites in the early years of the plan. Regenerating estates of social housing is important but it is essential that the delivery timescales for these schemes are robust. Such development needs to take account of the need to work closely with existing residents in terms of the schemes design as well as the need rehouse those residents during the development. This has the potential to impact on lead in times to the commencement of development as well as the overall timescale.

8. In relation to the delivery of brownfield sites the Council also indicates on pages 77 and 78 that one of the draw backs of options C and D was the potential for the focus on green field development may slow down the redevelopment of brownfield sites. Whilst we appreciate the concern, the level of need for new homes in Southend will be sufficient to ensure the development of greenfield sites without any detriment to delivery of development on brownfield sites. In fact, an essential element of any thriving housing market is a multiplicity of sites in terms of both size and location that will deliver different homes for different sectors of the population. A greater range of sites improves the mix of housing coming forward as, by and large, it encourages a wider range of housebuilder to operate in an area.
9. What is key to securing the delivery brownfield development is ensuring that costs placed on such development by the Council is not overly onerous as to make such development unviable. Increasing costs from changes to building regulations, infrastructure costs and the abnormal costs faced by those housebuilders developing brownfield sites are all important factors that need to be take into account when setting local policies. If the Council wants to see development on brownfield sites come forward quickly then it must ensure that its policies provide sufficient incentive for both the developer and land owner to ensure they can come forward without delay. To help local authorities understand the key concerns of our members with regard to development viability the HBF have produced a briefing note which is attached to this response.
10. In terms of meeting needs the development needs of Southend in other areas the Council indicate that this will be either in the form of a series of new neighbourhoods with distinct identities on the edge of Southend or part of a comprehensive Garden Settlement. The HBF welcomes any co-operation between councils that ultimately leads to housing needs being met in full. However, it will be important that when considering how the unmet needs of Southend are addressed that the approach taken by Rochford is deliverable within the plan period. Careful consideration will need to be given to the considerable time it can take to deliver strategic scale development and in particular new Garden Settlements. These are concerns we set out in our comments to Rochford's latest consultation, attached, and they will be important considerations for both Councils as they move forward with their local plans.

Conclusion

11. We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt'.

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