

Matter 1: Housing Requirement and Provision

Q1 Is the plan's housing requirement figure of 6,196 over the plan period, set out in Strategic Policy SP3, positively prepared, justified and consistent with national policy and in particular do any adverse impacts of providing for all or more of the area's objectively assessed housing needs (11,662 dwellings over the plan period calculated using the Standard Method) significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole?

a) Do the constraints identified by the Council justify not allocating each of the sites for housing development for further consideration by the DAC Green Belt Study, including sites which already have planning permission?

No.

The DAC Study confirms in paragraph 5.64 that none of the sub-areas for further consideration are covered by footnote 7 designations and each of the identified sites is considered to be in Green Belt that is performing either weakly or moderately against the purposes of Green Belt. As such each of the sites for further consideration identified in the DAC Green Belt Study meets the definition grey belt in NPPF. Therefore, there must be other fundamental reasons for not allocating these sites.

With regard to other constraints HBF recognise that some of the constraints affecting the sites such as Areas of Particular Biodiversity Importance (APBIs) will likely constrain development where they are present. These range from sites with a national designation such as an SSSI down to local wildlife sites. However, on sites not affected by either footnote 7 designations or APBIs HBF does not consider there to be any reason preventing sites identified in Table 10 of the DAC Green Belt Study from being allocated. The key constraints raised by the Council with regard to the sites listed in Table 10 are site specific – heritage, flood risk, strategic habitat creation opportunity areas, landscape – or more general constraints such as sustainable accessibility infrastructure, regeneration, viability and market capacity.

Turning to the site specific constraints HBF does not provide any detailed comment on specific sites, but as we note in our representations where these constraints are present it is possible mitigate the harm, yet no consideration appears to have been given as to how any potential harm could be addressed or whether any residual harm would significantly and demonstrably outweigh the benefits arising from the development of these sites.

The other factors taken into account by the Council are more general. With regard to infrastructure Council specifically highlights concerns with regard to sustainable access in the Housing Capacity Topic Paper. In paragraph 12.9 of this paper the council outlines that sites on the edge of settlements do not have ready access to services or public transport provision and do not contribute to the critical mass needed to support further services and public transport in the long term. However, the site specific assessments in some instances states that sites identified in the

DAC report as being suitable for release from the Green Belt would also have limited impact on the road network or that the impacts can be mitigated. Elsewhere the assessment is far from unequivocal as to the potential impacts and mitigation, stating in some cases that these are unclear. Even where the impacts cannot be fully addressed the Council must still consider whether the residual adverse impacts arising from these site allocations significantly and demonstrably outweigh the benefits. From the evidence presented the Council have tried to dismiss all sites in the Green Belt as being inherently unsustainable and with no possibility of mitigation. This is not the case as there are opportunities to amend Green Belt boundaries in a manner that is consistent with the objective of national policy to promote sustainable transport.

Other considerations into account by the Council include infrastructure, regeneration, viability and market capacity. Paragraph 17.1 states that that the infrastructure needs arising from higher levels of growth can be met. With regard to regeneration the Council states that there is a compelling argument that restricting development on Green Belt land plays a critical role in encouraging regeneration. If there were sufficient sites in the urban area to meet housing needs, then this would be compelling argument. However, given that assessed needs are not being met it is possible to deliver regeneration in the Borough's urban areas as well as release sites in the green belt to deliver housing. The two are not mutually exclusive. It is also the case that the approach being advocated by the Council has clearly not previously delivered the regeneration so desired by the Council. HBF would argue that increasing overall housing supply to that proposed by the Government would bring in investment for infrastructure and provide jobs for its residents. It will bring in more people who will visit its town centres creating demand for goods and services. Increasing housing supply above what is being proposed is more likely to be a driver of regeneration than restricting growth.

Turning to market capacity the Council are concerned that the number of homes required to meet needs in full is a 700% increase in housing delivery per annum compared to current levels. However, this is an area that has been constrained by the Green Belt and last adopted a local plan in 1998. It is unsurprising that the market has not delivered any more homes as the Council has not planned for more homes. There is clearly a demand for new homes in Castle Point. As the Council note in paragraph 17.28 of the Housing Capacity Topic Paper house prices have increased significantly over the last 8 years and there are developers promoting sites in the area. There is clearly a demand for new homes in Castle Point beyond what it has delivered in the past, and the Council need to identify sufficient sites to meet those needs.

HBF therefore considers there to be exceptional circumstances to support amendments being made to Green Belt boundaries in Castle Point and that there are no strong reasons for restricting the overall scale of development to the level being proposed by the Council. While there are constraints on development in Castle Point the evidence presented by the Council does not justify adopting the proposed spatial strategy which does not, despite the significant shortfall in market and affordable housing, release any land from the Green Belt. The approach taken by the Council fails to take a balanced approach in its consideration of the development needs versus environmental protection, placing significant weight on the latter and giving limited consideration to the benefits of meeting housing needs through the amendment of Green Belt boundary. It is HBF's opinion that the approach set out in SP3 means that the plan is fundamentally unsound. The only way to rectify this is through modifications that amend the Green Belt boundary to support additional allocations that will increase the supply of both market and affordable homes.

However, any additional allocations should not only focus on those sites identified in the DAC study for further consideration. These sites will not meet needs in full and as such there are the exceptional circumstances required to amend Green Belt boundaries even in those areas where the Green Belt is considered to be strongly performing unless as stated in paragraph 146 of the NPPF the release of those sites would fundamentally undermine the purposes of the Green Belt when taken as a whole.

Is there clear evidence that altering Green Belt boundaries to meet all or more of the area's objectively assessed housing need would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the Plan?

Firstly, with regard to the sites recommended for further consideration the fact that these are not considered to be strongly performing against the purposes of the Green Belt means that their allocation would not fundamentally undermine the purposes of Green Belt across the area of the Plan. However, given that the Council fall well short of meeting needs it is necessary, as stated above, to consider whether those sites submitted but not within this list would fundamentally undermine the purposes of the Green Belt.

But it is not clear from the evidence base whether this particular issue has been considered by the Council in relation to all potential allocations. The DAC study certainly does not consider this issue stating in paragraph 5.7.4: *"It is considered that this assessment of the potential to 'fundamentally undermine' is a test that should be applied most appropriately at a plan level rather than within the assessment of individual sub-areas ..."*. The consideration of this matter is not referenced in either the Sustainability Appraisal, the Amendments to the Green belt Boundary Topic Paper nor the Housing Capacity Topic Paper. As such it will be necessary for the Council to explain at the hearings where and how this was considered as part of preparing this local plan.

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