

North Essex Authorities - Joint Strategic (Section 1) Plan Examination – Matters Statement

Date 4th December 2017
Our ref 15947/MS/SFU
From Lichfields on behalf of David Wilson Homes Eastern

Subject Matter 7 – The Spatial Strategy for North Essex (Policy SP2)

1.0 Introduction

1.1 Lichfields has been instructed by David Wilson Homes Eastern (“DWH”) to prepare Matters Statements for the North Essex Authorities Joint Strategic (Section 1) Plan [JSP].

2.0 Q.1 Taking account of the Sustainability Appraisal and other relevant evidence, is the spatial strategy in policy SP2 justified as the most appropriate development strategy for North Essex, when considered against the reasonable alternatives?

2.1 No. The spatial strategy has a focus on Garden Communities and, in of itself, it is not necessarily an inappropriate strategy to pursue. However, a feature of this spatial strategy (as with almost any large-scale urban extension or new settlement) will be a long lead-in time for the Garden Communities development to start and for build rates to be variable depending on a range of factors. The effect is one that backloads the meeting of housing needs to later in the plan period, necessitating (in the Council’s view) the adoption of the *Liverpool* method for addressing shortfall. There is a clear preference in the PPG (ID3-035) to make good the shortfall within five years (the *Sedgefield*) method.

2.2 The Sustainability Appraisal and evidence in the plan fails to give sufficient consideration to a number of factors:

- 1 By backloading development in Garden Communities without including shorter term development opportunities in and on the edge of settlements, this results in housing needs not being met in the short term, which will have clear adverse consequences that are not necessarily made good by providing housing later in the plan period.
- 2 There is a significant risk that too much of the spatial strategy is dependent on the performance and delivery of the Garden Communities. If there are delays in those sites coming forward – which is common¹ – the Plan’s strategy does not have sufficient alternative provision to make good this shortfall in a plan-led way.
- 3 By focusing a strategy on Garden Communities, there is a risk that the needs and benefits to other settlements of new development is under-estimated, and indeed, that smaller

¹ For example, research carried out by Lichfields in *Start to Finish* (reviewing over 70 large-scale development sites) found that the average lead-in time (from submission of a planning application, to first completion of a dwelling) for sites of 2,000 homes plus is 6.1 years, with many examples of sites taking longer. The average for all sites of 500+ dwellings is 5 years. The average lead-in time for smaller sites of under 100 dwellings is 2.9 years. <http://lichfields.uk/media/1728/start-to-finish.pdf>.

settlements can decline in socio-economic terms, even if their housing stock is static or growing slightly².

- 4 Finally, there are problems in terms of the plurality of supply in having a spatial strategy focused on large sites, notably in terms of ensuring sufficient provision of smaller sites for smaller house builders, and in this regard, we note the Government's recent proposals (in the Autumn Budget 2017) for 20% of housing to be provided by means of smaller sites.

3.0 Q. 2 Why does the spatial strategy include provision, at the proposed garden communities, for substantial development beyond the Section 1 Plan period?

- 3.1 Having development extending beyond the Plan period reflects that for Garden Communities, they have long lead-in times and extended build periods and it would not be appropriate for their size to be artificially capped to a figure that relates to a plan period.

4.0 Q. 3 Does policy SP2 adequately and appropriately define the role of each tier in the settlement hierarchy?

- 4.1 No, there is a lack of clarity over how the general approach relates to the future role of the respective settlements and how that relates to the scale of growth they are anticipated to accommodate.

5.0 Q. 4 Is the detail in paragraphs 3.3 to 3.5 relevant to Section 1 of the Plan? If it is, should it be included in policy SP2?

- 5.1 No comment.

6.0 Q. 5 Should paragraph 2 of the policy refer to the need to avoid the coalescence of settlements?

- 6.1 No comment.

7.0 Q. 6 Does the reference to “Garden City principles” in the last paragraph of the policy identify the principles that are intended with sufficient clarity? What is the relationship between these principles and the North Essex Garden Communities Charter (June 2016)

- 7.1 No comment.

² For example, the Council's evidence in *Braintree District Ward Profiles Hatfield Peverel & Terling Ward June 2016* (appended to DWH's representations) is that “*The population in Hatfield Peverel & Terling Ward has decreased by 0.22% since the last Census. This is one of the few Wards in the District that has seen a fall in population when comparing the 2011 and 2001 Census data.*” It also found that: “*According to the 2011 Census, Hatfield Peverel & Terling Ward has a much higher proportion of its residents who are aged 60 and over than at a District or County level. The Ward has nearly 30% of its residents who are aged over 60 compared to roughly 25% of residents in the Braintree District and Essex overall.*”