

LIGHTWOOD STRATEGIC: MATTER 4 HEARING STATEMENT

NORTH ESSEX AUTHORITIES

Shared Strategic (Section 1) Plan

FURTHER HEARING SESSIONS

Matter 4 (Build Out Rates)

Wednesday 15^h January 2020

Issues:

Does the NEAs' document Build out rates in the Garden Communities (July 2019) [EB/082] provide clear evidence to support build-out rates of 300 dwellings per annum [dpa] at each of the proposed garden communities?

Is there any new evidence, not available at the time of the original hearing sessions, that would justify a revision of the finding in my letter to the NEAs of 8 June 2018 [IED011] that: "... it [is] reasonable to assume that the planning approval process would allow housing delivery at any GC(s) to start within four or five years from the adoption date of the plan (or plan revision) which establishes the GC(s) in principle"?

- 1) Lightwood Strategic note the Inspector's guidance in IED20 (paragraphs 12-13), that hearing statements are not obligatory and that further written material will only be helpful if additional points are raised that were not covered in the representations on the NEA's technical consultation. Given the volume of material that the examination is having to process we understand the Inspectors wish for brevity and to avoid repetition.
- 2) We note that the first set of Questions labelled **Q1(a&b) and Q2 (a&b)** are for the NEAs and NEGC Ltd to comment on, and require a response to participants critiques of build rates and lead-in times, notably those of Gladman (Appendix AL: Nathaniel Lichfield) regarding build out rates.
- 3) The second set of questions (also referred to **Q1(a-c) and Q2 a&b)** invite comment from all participants on other relevant studies, the relationship between the number of outlets required and built out rates
- 4) Lightwood Strategic's focus is on build out rates, and the implications for the viability assessment of each garden community rather than lead-in times, and how much could be delivered in the plan period. This is because the proposed garden communities, if they start and if they deliver as programmed would result in a considerable over supply against the combined housing requirement, and therefore any slippage in lead-in times

by a year or so would not affect the likelihood of meeting the overall housing requirement

- 5) However, we do consider that caution is needed when budgeting for first completions from the proposed garden communities in the housing trajectory at adoption. The Inspector's original 4-5-year assumption should perhaps sit comfortably with an appeal-based scenario that tests 5-year land supply post adoption. It is in no-one's interest to wave through plan-making assumptions that won't stand-up to appeal-based scrutiny. We advise that the examination of the Part 1 Plan should take an S.78 based attitude to first completions. We refer the Inspector to a recent appeal decision in Milton Keynes (APP/Y0435/W/18/3214564). Here the Local Plan was adopted in March 2019, but in September 2019 the referenced appeal decision saw 2,717 homes wiped off the 5-year supply of deliverable sites.
- 6) Clearly, we are of view that the Part 1 Plan cannot be found sound in respect of all the proposed garden communities on the basis of the additional evidence that has been produced, but if the Plan was adopted in 2020 with one or more GCs in it, the housing trajectory should not include any completions within the garden communities until after the end of 2024/25. Further the 5-year period beginning 2021/22 would shortly be upon the NEA's and therefore it would be prudent not to allow for any development until after at least after 2025/26.
- 7) However, following that logic through, the examination of the Part 1 Plan (having regard to the housing trajectory and anticipated delivery from Part 2 Plan allocations), the examination of the Part 1 Plan (which current hosts the spatial strategy) should ensure that the right sort typology of sites are being allocated to achieve (and maintain) a 5-year land supply in the early years of the plan period. Clearly, the point we are getting at here is that if the proposed GCs are being proposed to complete the job of meeting the long term housing requirement, yet the requisite 5-year supply position is vulnerable or absent, then perhaps other sites should be identified instead that could play a dual delivery role (short term and within the plan period as a whole). The SA does not say that further growth at existing places has been exhausted.
- 8) On the issues of build out rates, we have made our key points in our technical consultation response. The NEA's document [EB/082] does not provide clear evidence that 300 per annum is a 'prudent' assumption. It merely confirms that the Inspector's initial conclusion was correct. We concur with the review of EB/082 by NLP for Gladman. NLP's work has been regularly endorsed at S.78 appeals. We repeat that the concurrent development of four new communities along the A120 and an unencumbered over supply of housing against the requirement (i.e. the plan proposes that a few thousand more houses will be occupied than there is a need for) will have dampening effect on

delivery in the plan area garden communities. Where is the additional housing demand coming from that will support the proposed delivery rates?

- 9) The impact of a cap of 250 per annum on the viability profile for each garden community is a matter for the viability sessions.
- 10) However, it is clear that if the HIF bid for Colchester Braintree Borders of £229m is based on an assumed rate 300 per annum, then additional forward funding will be needed at 250 per annum. However, The NEA's seem indifferent to asking the taxpayer for money for their garden communities projects, even though the additional SA shows that the further growth at existing places is 'sustainable' and would not require this level of funding.
- 11) Thus, we have no doubt that their response to not persuading the examination that 300 per annum is prudent, and worsening viability profile, would be to go back to Homes England with a higher HIF bid, even though lower original bid has not been successful.
- 12) We wonder what the strategy would be if the HIF funding was awarded yet delivery did not achieve the assumed rate (300pa) by the early 2030s.? Would a further taxpayer bailout be needed/ asked for?