

# **REBUTTAL STATEMENT**

## **MATTER 4: BUILD OUT RATES**

**North Essex Authorities Shared Strategic (Section 1) Plan –  
Further Hearing Sessions**

**SUBMITTED ON BEHALF OF L&Q, CIRRUS LAND LIMITED, AND  
GATEWAY 120**

December 2019



**Contents**

1 Introduction..... 5

2 Build Out Rates ..... 6



## **1 INTRODUCTION**

- 1.1 This statement has been prepared on behalf of L&Q, Cirrus Land Limited, and Gateway 120, who together form the West Tey Delivery Partners behind the majority landholdings within the Colchester Braintree Borders Garden Community (CBBGC).
- 1.2 This Statement has been prepared as a rebuttal to specific matters raised within parties Hearing Statements in regards to Matter 4 – Build out Rates.

## 2 BUILD OUT RATES

- 2.1 The evidence produced by the NEAs and supported by the site promoters, including L&Q provide sufficient confidence that both the 300 dwellings per annum (dpa) and 354 dpa are sound, and even conservative assumptions to apply to housing trajectories at Colchester Braintree Borders Garden Community (CBBGC), as well as the other two proposed garden communities.
- 2.2 The below does not seek to repeat this evidence, but make necessary clarifications, correct inaccurate statements, and/or address specific criticisms made towards the West Tey Delivery Partners.

### Absorption Rates

- 2.3 Appendix 6 of our Viability Report demonstrates how Colchester Borough has the ability to accommodate a significantly higher level of housing than either has been delivered previously or is proposed to be planned for in the emerging Local Plan. This means that there is the ability for the garden community at West Tey to deliver a significantly high level of housing without being restricted by the 'absorption rate' of the area.
- 2.4 CAUSE's Hearing Statement argues that Colchester has long outstripped other districts in Essex when it comes to housing delivery, and CAUSE does not see how Colchester can or should grow faster than it does already. However, the reality is that Colchester Borough Council (CBC) hasn't experienced significant growth compared to comparable markets, with it ranking 59<sup>th</sup> out of all local planning authorities for net additional dwellings as a proportion of stock<sup>1</sup>.
- 2.5 Appendix 6 to our submitted Viability Report omitted a similar assessment of market capacity (absorption rates) for Braintree District Council (BDC). Using the same methodology as with CBC, comparing average delivery rates since 2001-02 against average dwelling stock, BDC grew by approximately 0.9% per annum, compared to 1.2% for CBC. BDC also experiences a slightly higher affordability ratio than CBC<sup>2</sup>, but is also comparable to a number of local authorities who have experienced much higher stock growth.
- 2.6 Applying a 2 and 2.5% stock growth to BDC would suggest an ability to accommodate some 1,223-1,529 dpa, or an additional 676-982 dpa against average historical delivery. Therefore, a similar conclusion to CBC can be reached that there is capacity in the market to add at least an additional 500 dpa without absorption rates being a constraint.

---

<sup>1</sup> See "Highest supply markets" table at Appendix 6 of our submitted Viability Report.

<sup>2</sup> 10.17 in BDC compared to 9.51 in CBC.

- 2.7 A few parties have stated that whilst delivery rates of 300/354 dpa across approximately six outlets is possible at a garden community, to do so at three communities at once would result in some 18 outlets and 900-1,062 dwellings within a shared housing market area. However, this creates a straw-man of the garden community proposals. They are in fact located across three local authorities (four when incorporating Uttlesford District Council), with East of Colchester located some 40km from West of Braintree. At the above levels they would deliver less than half of the current annual housing requirement of the Local Plan, just 40% of the local housing need figure applying the standard methodology<sup>3</sup>, and just a fraction of the potential growth levels applying the stock growth comparable we detail above and at Appendix 6 of the Savills Viability Report.
- 2.8 If there are doubts of whether the garden communities, spread across the entire housing market area as they are, can deliver 900-1,062 dpa, then logically any combination of sites would come under the same market absorption pressures. As such, the question becomes one of total market absorption based on demand and is not associated with the Garden Communities themselves.
- 2.9 There are suggestions that, through a combination of committed developments and proposed allocations in the Section 2 Local Plan, there is no identified need for any garden community proposals in the Plan period. This ignores the long term principle of the garden community movement. The Strategic Section 1 Plan is setting the foundations to allow for comprehensively planned growth across a number of Plan periods.
- 2.10 Furthermore, the Garden Community Prospectus supports proposals which release more land through local plans to meet local housing need, and/or go above local housing need<sup>4</sup>. There is clear evidence that there is additional capacity in the market to accommodate additional housing delivery to the proposed housing requirement of the Local Plan. This would contribute to Government policy of significantly boosting the supply of housing in order to address rising affordability at a national level, and align with the encouragement of the Garden Community Prospectus for garden communities to play a role in doing this.

#### Timing of Implementation

- 2.11 We support the NEAs in recognising the ability to twin-track the preparation of a planning application(s) or Local Development Order concurrently with that of the site specific Development Plan Documents. This would reduce lead-in times by one-two years and reflect the fact that the establishment of the principle of garden community as part of the Section 1 Local Plan has involved considerable evidence base work to-date.

---

<sup>3</sup> Appreciating that this could well be the revised figures following the first Local Plan Review.

<sup>4</sup> MHCLG Garden Community Prospectus – Paragraph 9.

- 2.12 The actual lead-in time for the garden communities dates back a number of years, with West Tey having been promoted as a comprehensively planned garden community since the early 1990s, and L&Q and Cirrus having been involved in the site since 2015.
- 2.13 In this time, a significant amount of technical work to demonstrate the deliverability of the garden communities has been done. This work has been vital in evidencing the deliverability of draft policy and can seamlessly be transferred into assisting the production of the DPD and LDO/planning application processes.
- 2.14 The Delivery Partners have shown the potential for West Tey to begin delivery in advance of the A12 and A120 upgrades, with anticipated delivery rates meaning that the upgrades would be in place prior to unacceptable road capacity issues i.e. the site would be able to continue delivering uninterrupted.
- 2.15 Accordingly, the Inspector can have sufficient confidence that first delivery of the garden communities can commence from 2023/24.

#### Greater Beaulieu Park

- 2.16 At 2.31 of our Matter 4 Hearing Statement we stated that Beaulieu Park had delivered 226 homes under one flag, delivering two core styles under different brands and with different house types within this for a wide market offering. This should in fact have 262 homes delivered at Beaulieu Park over 2017/18, with a further 110 homes delivered at the adjacent “Channels” development in the same recording year.
- 2.17 In its own Hearing Statement, Countryside Properties stated how it has had several outlets selling concurrently (4 in 2017/18 Beaulieu Chase, Heath, Keep and Oaks) and this has continued with 3 outlets currently at Beaulieu. Both our statement and that of Countryside Properties is correct, namely that a single developer can itself provide numerous products that allow for higher rates of delivery to be sustained.
- 2.18 As both parties have detailed, this excellent delivery base from a single market sale developer, can then be supplemented by both other developers providing slightly different product (e.g. at Beaulieu with Cala purchasing a parcel for 152 homes for sale in addition to Countryside Properties), and/or with different tenures (L&Q planning to deliver a parcel of 300 shared ownership homes, and a care provider delivering 82 homes at the site also).

#### Modern Methods of Construction

- 2.19 Countryside Properties rightly highlight the role that modern methods of construction can and will play in the delivery of garden communities, particularly helping maintain a high and consistent level of delivery.



- 2.20 L&Q has adopted its own Modern Methods of Construction (MMC) strategy, which will see all of its new homes built with some form of MMC by 2025, and its first entirely off-site manufactured home by 2028. L&Q is an active member of the Advanced Industrialised Methods for the Construction of Homes (AIMCH) project, working with a range of sector partners to transform how homes are built. The group will be working on developing offsite solutions, with the goal of helping the housing sector deliver the tens of thousands of homes the UK needs to meet demand. One example of this is the strategic partnership L&Q has formed with Stewart Milne, an offsite timber frame manufacturer, to deliver timber frame for more than 1,500 homes. These are currently being delivered on sites at Birnam Mews in Tiddington, and Saxon Reach, in Milton Keynes.
- 2.21 Furthermore, the Delivery Partners have also explored the potential of setting aside land at an initial stage of the proposals to provide an on-site MMC factory.
- 2.22 Different MMC measures can help address potential future risks around the supply of materials and/or labour. Build quality is also more strictly controlled within a factory setting, where quality control measures are stringently enforced.