



North Essex Authorities Joint Strategic (Section 1) Plan

Examination in Public

Hearing Statement

by

Andrew Martin – Planning Limited

on behalf of

Crest Nicholson Operations Ltd, R.F. West Ltd,
Livelihoods and David G Sherwood

SECTION 1

Matters 3



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Matter 3: Meeting housing needs (Policy SP3)

- Q2 *Are the proposed overall housing requirements in Policy SP3 based on a sound analysis of the available and relevant evidence...?*
- Q3 *Should the Section 1 Plan make provision for higher or lower housing requirement figures, and if so, what is the justification for the alternative figures?*

We have previously supported the overall objectively assessed need figure for Colchester Borough of 920 homes per annum. We have however objected to the housing trajectory on the basis that there is doubt over some of the housing allocations in Part 2 for Colchester and the degree to which these will meet the five-year housing land supply requirements of the Borough.

We note that the examination of the Section 1 Plan will not permit firm conclusions to be drawn on the 5 year housing land supply position for the three authorities including Colchester, because it is only concerned with that to be provided by the garden communities. On this basis we question delivery and delay and argue that greater flexibility should be introduced at this stage of the two-part plan to include more sites capable of being delivered in the early years. As we will expand upon in response to Matters 6 and 8, land at East Marks Tey could be brought forward early in the plan period as a free standing development or first phase of the proposed new community.

Since the Peter Brett Housing Need Study was undertaken in 2016, there have been new household projections and a significant upward adjustment to growth figures in London that have not been taken into account. Finally in September 2017 the Government launched consultation on a proposed standardised method for calculating housing need in its publication "Planning for the right homes in the right places: consultation proposals". Alongside this document the Government published a schedule of housing need for each authority in England based on current data applied to the new method. This shows a 19.02% rise in Colchester's housing allocation, increasing the annual housing requirement from 920 homes per year to 1095. In the case of Braintree the requirement has risen from 716 homes per year to 835 – a 16.6% increase, and Tendring from 550 homes per year to 749 – a 36.2% increase. In Chelmsford, which is also within the Housing Market Area, the increase is from 805 to 980 homes per year – a 21.7% increase. Commutatively this results in an overall annual requirement of 3,659 homes per year compared with the 2,186 currently being planned.

Although the North Essex Councils are resisting consideration of the consultation document (on the basis that the three Plans were submitted prior to 31 March 2018), we submit that this and the latest Government assessment of housing need do give a clear indication that housing requirement is going to continue to rise significantly and will need to be addressed. This will have implications for monitoring and review that will need to be addressed in policy and the need for flexibility to be built into the Section 1 Plan.



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Q5 *Should Policy SP3 make it clear that the five-year supply of housing land must include an appropriate buffer in accordance with NPPF paragraph 47?*

For reasons set out above under Q2, it is considered that the answer to Q5 is 'yes'.

Q6 *How will any undersupply of housing against the relevant requirement since 2013 be accounted for in the Section 1 Plan?*

Q7 *Should policy SP3 include mechanisms for:*

- a) *review of the housing delivery strategy in the event of a failure to maintain the required level of housing supply?*
- b) *Review of the housing requirement figures in order to provide for possible future unmet need from other local authority areas?*

The housing land supply position for Colchester has been assessed as of 31 March 2017 in the Colchester Housing Land Supply Statement. The relevant five year housing land supply period is considered to be April 2017 to March 2022.

The Council's statement confirms that the adopted Local Plan set a target of 19,000 homes to be delivered over the period 2001 – 2023 i.e. 830 dwellings per annum (dpa). It claims that delivery has exceeded expectations. From 2001 -2017 there has been a cumulative surplus of 939 homes.

The emerging Local Plan target is 14,720 homes to be delivered over the period 2017 – 2033 i.e. 920 dpa.

The annualised housing target of 920dpa is derived from the Objectively Assessed Housing Need (OAHN) Study published in 2015 by Peter Brett Associates (PBA). This equates to a figure of 4,600 homes being required over a five year period. Together with a 5% buffer there is a requirement for 4,825 homes. The Council maintains that there is a supply of 5,216 homes i.e. 5.4 years supply.

It is understood that the HBF in responding to the Publication Draft plan has called for 1002dpa. It states that 866 should be the starting point, plus 45 for the London migration scenario and a 10% uplift. We call into question whether further updating of the figures is required to take into account more recent proposals to increase the London figures still further and the call on outer London Boroughs to take more of the growth. Given that proposals seek to tighten Green Belt restrictions even more, and that the London Boroughs are reliant on large brownfield sites, which are beset with overriding obstacles to delivery, it is going to be difficult for them to help with outstanding need more generally in London. This will place further pressure on the authorities in the south east such as Colchester. In addition the latest advice from the Government in its proposals for simplifying the methodology for calculating OAN, and likely targets for each authority going forward, give a general direction of travel that identifies significant increases especially in an authority like Colchester (a 19.2% increase is proposed).

The HBF has criticised Colchester's approach to housing supply whereby over delivery from previous plans is being used to improve the five year housing land supply. Instead the Government advises that over-delivery in the past should be factored into the assessment of need for housing rather than as a part of its land supply.

For the period 2013/14 – 2016/17 the Council had a backlog of housing against planned supply, by 110 dwellings. As required by the PPG the Council should seek to reduce this backlog within the first five years of the plan. This approach ('Sedgefield') is called for by the HBF. The alternative 'Liverpool'



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approach seeks to meet the backlog across the whole plan period. Using these different approaches the Council has a 5.2 years of supply (Sedgefield approach) and a 5.3 (Liverpool approach). This is more marginal than the 5.4 years of supply currently calculated by the Council.

However, research shows that it is becoming increasingly important to take account of lapsed permissions and delayed deliveries. No account is taken of these issues by Colchester. Indeed the Draft Publication Local Plan seeks to reallocate sites that were intended to come forward by 2021, with the expectation they are delivered in the final third of the plan period.

The PPG calls for there to be an overall risk assessment of whether sites will come forward as anticipated. Braintree has made an allowance for lapsed planning permissions. The DCLG has called for the need to take account of lapsed rates of 10 – 20% and non-implementation rates of 15 – 20%. The housing trajectory shows that of a total figure of some 5,200 homes, some 80% are existing commitments. Some of these such as Fiveways Fruit Farm at Stanway and parts of the Garrison proposals, do not have planning permission.

It is submitted that there should be a degree of flexibility to protect delivery from unforeseen circumstances, as called for by the HBF. More sites also need to be allocated in the plan period that will deliver in the first five years.

Finally we maintained in previous representations that the housing trajectory proposes delivery of sites in the first five years of the plan that do not comply with its own proposed hierarchy for growth.

In relation to Q6 and Q7, it is considered that Policy SP3 should include mechanisms for review of the housing delivery strategy in the event of a failure to maintain the required level of supply. This should be through the drafting of an appropriate policy that would require the Local Authorities to start an early review of Section 1 of the Joint Plan should it be found to be under-performing and resulting in the five years housing supply requirement not being met or unlikely to be met. In addition, the emerging DPD for the Colchester Braintree Borders Garden Community (CBBGC) should include land that can be brought forward earlier in the plan period as an early phase of the new community, and which is not dependent upon major strategic infrastructure. The Land at East Marks Tey being promoted by Crest, RF West and Livelands represents a site that could be brought forward early in the Plan period without jeopardising the overall CBBGC proposals. It would also create benefits to the existing Marks Tey community in the short term. Proposed development on land at East Marks Tey is ready to be delivered and crucially will not prejudice the Section 1 Plan (see the promotional brochure submitted with Representation to the Draft Publication Plan for Colchester in August 2017).



Introduction to Crest as Promoter of the Land in Question

(Hearing Statements 1-8, submitted on behalf of Crest Nicholson Operations Ltd,
R.F. West Ltd, Livelands and David G Sherwood)

Crest Nicholson is a FTSE-250 company which has acquired a top level reputation for developing high quality housing within well-conceived masterplans for over 50 years across the south of England. We create places where people genuinely want to live, work and play, underpinned by a “value-adding” strategy which responds well to the aspirations of local communities. Importantly, this approach delivers a positive legacy for local planning authorities. For example, Swindon Borough Council’s experience of Crest’s placemaking and delivery at the new community, Tadpole Garden Village, is such that they are prepared to positively advocate our approach.

Crest are in the vanguard of delivering Garden Villages and sustainable new communities. We have been recognised for our exemplar approach, having won numerous awards over recent years including:

- Best Community Initiative for Community Interest Company at Tadpole Garden Village (Housebuilder Awards)
- Sustainable Housebuilder of the Year (Housebuilder Awards)
- Large Housebuilder of the Year (Housebuilder Awards)
- First or Second in Next Generation Benchmark for the last four years (only independent sustainability benchmark of the 25 largest homebuilders in the UK)
- Winner, Outstanding Landscaping for Housing (The Sunday Times British Homes Awards)

We are pleased to align ourselves with the principles set out by the TCPA for Garden Communities and we work closely with other organisations such as Local Enterprise Partnerships and the HCA in order to enhance delivery rates in line with national government objectives.

Our teams are highly experienced in delivering the required infrastructure that sits alongside new housing. At East Marks Tey, Crest are proposing to deliver another high quality development which encapsulates 21st Century Garden Village Principles, and delivers appropriate infrastructure in a timely and efficient way to benefit the local area. This includes a primary school, local centre, re-instatement of Marks Tey hall and its associated listed buildings, new employment provision, and green infrastructure to include open space, allotments and sports pitches.

We look forward to engaging proactively with Colchester Borough Council to deliver on our shared objectives.