

North Essex Authorities Joint Strategic (Section 1) Plan

Examination Hearing Statement on
Matter 3
For Ptarmigan Land Ltd

indigo.

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1. Introduction

- 1.1. This Hearing Statement is submitted on behalf of Ptarmigan Land Ltd in response to the Inspector's Matters, Issues and Questions (Document Ref: IED003).
- 1.2. This Statement sets out Ptarmigan's response to Matter 3 with specific reference to the Inspector's questions. Further Statements have been submitted for Matters 1, 5, 6 and 7.

2. Response to Inspector's Questions on Matter 3

Question 3: 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?

Objectively assessed housing needs

- 2.1. The Objectively Assessed Housing Need Study (OAHNS) commissioned in collaboration between Braintree, Chelmsford, Colchester and Tendring Councils, published in July 2015 and updated in February 2016, provided an objective assessment of housing need over the period 2013-2037.
- 2.2. The OAHNS confirmed that this combined area forms a single Housing Market Area (HMA). The underlying principle of the OAHNS work is that planning for housing, economic land uses and community facilities / services should be integrated, so that the demand for labour is fulfilled and there is no unsustainable commuting.
- 2.3. The OAHNS identified the following objectively assessed need (OAN) for each of the local authorities:
 - Braintree: 845dpa;
 - Colchester: 920dpa; and
 - Tendring: 550dpa.
- 2.4. The full OAN for Braintree was originally taken forward in the Draft Local Plan (June 2016) and at that time, Ptarmigan did not raise any objection to the overall housing target for the District.
- 2.5. However, the HMA authorities commissioned Peter Brett Associates (PBA) to prepare an update to the OAHNS which was published in November 2016. For Braintree, the updated OAHNS concludes that the OAN for the District is 716dpa. This is a reduction of 129dpa (15%) when compared with the 845dpa identified in the 2015 study. Behind this 15% reduction are decreases in both the official demographic projection and the Essex Economic Forecasting Model (EEFM) view of future jobs.
- 2.6. On this basis, Policy SP3 of the Local Plan Section 1 identifies minimum housing targets for the period 2013-2033 for the three North Essex authorities as follows:
 - Braintree: 14,320 (716dpa);
 - Colchester: 18,400 (920dpa); and
 - Tendring: 11,000 (550dpa).
- 2.7. However, the DCLG has since published its consultation document 'Planning for the right homes in the right places' (September 2017). This document sets out the proposed standardised approach to calculating objectively assessed needs (OAN). The accompanying schedule identifies that the new OAN for the three authorities when adopting the new standardised methodology is as follows:
 - Braintree: 835dpa;
 - Colchester: 1,095dpa; and

- Tendring: 749dpa.
- 2.8. Against the proposed housing targets for each local authority, the proposed methodology results in an increase of 493 dwellings per annum and 9,860 homes for the plan period 2013-2033. This can be broken down as follows:
- Braintree: 2,390 homes / 119dpa;
 - Colchester: 3,500 homes / 175dpa; and
 - Tendring: 3,980 homes / 199dpa.
- 2.9. Therefore, by not adopting the new methodology, the North Essex authorities are proposing to deliver 9,860 homes less than what is deemed to be required to address affordability issues in the area.
- 2.10. Whilst we acknowledge the provisions in the DCLG consultation document, which suggest that local authorities who submit their Local Plans for examination prior to March 2018 may not have to consider the new methodology for OAN, we consider that the figure of 835dpa for Braintree and the respective figures for the other North Essex authorities, should not be ignored as this figure reflects a housing need that seeks to address levels of unaffordability in the District, irrespective of other factors such as levels of employment growth.
- 2.11. By adopting the proposed OAN figures outlined in the DCLG document, the North Essex authorities would essentially be future proofing its Local Plan and the housing targets included in it. The DCLG consultation document proposed that local planning authorities should be able to rely on the evidence used to justify their local housing need for a period of two years from the date on which they submit their plan.
- 2.12. Therefore, it is entirely reasonable to assume that the Councils' housing requirement could be challenged at appeal after two years on the basis that the Local Plan housing targets for each area are significantly lower than the OAN figures contained within the standardised methodology. This could result in a lack of five year housing land supply being demonstrated and less favourable schemes being allowed at appeal which would undermine the spatial strategy set out in the Local Plan.
- 2.13. To safeguard against this from happening, the North Essex authorities should take forward a higher housing target to reflect the DCLG figures and subsequently identify additional sites for new housing in the Local Plan (Sections 1 and 2).
- 2.14. In addition, we consider that a commitment to reviewing the Local Plan should be included within the Local Plan. This has been considered further in our Statements in response to Matters 5 and 6.

Uplift to build-in flexibility

- 2.15. Policy SP3 of the Local Plan identifies a total housing requirement of 43,720 homes in the Plan period 2013-2033. This equates to an annual requirement of 2,186dpa.
- 2.16. A key component of this requirement is envisaged to be delivered through three new garden communities in North Essex. These are:
- Tendring/Colchester Borders, a new garden community will deliver 2,500 homes within the Plan period (as part of an overall total of between 7,000-9,000 homes to be delivered beyond 2033);
 - Colchester/Braintree Borders, a new garden community will deliver 2,500 within the Plan period (as part of an overall total of between 15,000 – 24,000 homes to be delivered beyond 2033); and

- West of Braintree in Braintree DC, a new garden community will deliver 2,500 homes within the Plan period (as part of an overall total of between 7,000- 10,000 homes to be delivered beyond 2033).
- 2.17. A total of 7,500 homes are envisaged to be delivered from these three new communities in the Plan period up to 2033. This equates to 17% of the total housing proposed in the North Essex area.
- 2.18. For Braintree District, the reliance on the timely delivery from the new Garden Communities is more pronounced. A total of 2,500 homes are envisaged to be delivered in Braintree from the West of Braintree Garden Community and 1,150 from the Colchester / Braintree Borders Garden Community. A combined total of 3,650 homes. This equates to over 25% of the total housing requirement for Braintree District.
- 2.19. New communities of the scale proposed in the Draft Local Plan are inherently complicated and have significant lead in times before new housing is delivered. The significant investment required in assembling the land, providing the infrastructure and delivering the schemes means that they are usually delayed and take considerably longer to deliver than expected. Therefore, there is a substantial risk that the new communities will be delayed and a shortfall in delivery will arise in the District. These issues were explicitly raised in Lord Bob Kerslake's North Essex Garden Communities Peer Review (January 2017) which considered that:
- "The timetable for the Local Plan is ambitious given the scale and complexity of the garden communities"* (page 6) and
- "The three locations proposed for these communities are dependent on some major infrastructure commitments."* (page 8) and
- "For settlements of this scale, significant development resource will be needed over a long period. Comparisons with other developments suggest that for a community of a scale comparable to these proposals, the resourcing from start to planning approval might typically take 7 years"* (page 7).
- 2.20. Our concerns over the deliverability and timing of the new Garden Communities is set out in our Statement in response to Matter 6.
- 2.21. We consider that the Local Plan must take appropriate steps to ensure that it identifies sufficient sites that will deliver the housing required within the Plan period up to 2033.
- 2.22. In our view, these steps should include the following measures:
1. The Local Plan Section 1 should seek to include a higher housing target for each of the local authorities to provide an additional 10%-15% more housing than currently proposed (depending on their individual reliance on the new Garden Communities) to build in resilience and flexibility in the Local Plan so that it can accommodate any change in circumstances and/or slippage to the trajectory in delivering the new Garden Communities (and other strategic allocations identified in Local Plan Section 2);
 2. Coupled with the above, additional housing sites should either be identified in Local Plan Section 2 (for each authority) as new allocations or a list of reserve sites identified so that they can be brought forward should delays in the delivery of the new Garden Communities and a shortfall in the five year housing land supply arise.
- 2.23. We consider that these measures are necessary to ensure that the Local Plan is flexible and remains fit purpose should any change in circumstances or delays to the delivery of the new Garden Communities arise.

Question 7: Should policy SP3 include mechanisms for (a) a review of the housing delivery strategy in the event of a failure to maintain the required level of housing supply? And (b) a review of the housing requirement figures in order to provide for possible future unmet need from other local authority areas?

- 2.24. We consider that the wording of Policy SP3 should include an appropriate mechanism for both:
- a) A review of the housing delivery strategy in the event of a failure to maintain the required level of housing supply; and
 - b) A review of the housing requirement figures in order to provide for possible future unmet need from other local authority areas.
- 2.25. In addition, we consider that Policy SP3 should reflect the findings of the government's Housing White Paper (February 2017) which recommended that local planning authorities should undertake a review of their Local Plans every five years to ensure that the housing targets are based on the most up-to-date assessment of housing needs and that the spatial strategy remains fit for purpose.
- 2.26. As identified in our response to question 3 above (and in our Statement on Matter 6), we consider that there is a significant risk that the delivery of new homes as part of the new Garden Communities will be delayed which will have a significant impact on the North Essex authorities' ability to maintain the required level of housing supply and could result in a shortfall in five year housing land supply.
- 2.27. With specific reference to Braintree District, the failure to deliver new homes at the West of Braintree Garden Community as early as 2023/24 and at the Colchester / Braintree Borders Garden Community by 2024/25, would have significant repercussions on the ability of Braintree District Council, and by consequence the North Essex authorities, to deliver the homes that are required to meet the housing targets set out in the Local Plan and to maintain a deliverable five year housing land supply throughout the plan period.
- 2.28. Should the new Garden Communities be delayed, or fail to deliver as many homes as envisaged in the housing trajectory, Braintree and the other North Essex authorities will find it extremely difficult to maintain a deliverable supply of housing land and will be subject to more speculative planning applications (and appeals) that is likely to lead to new housing being provided in less preferable (and sustainable) locations.
- 2.29. Given that the housing targets set out in Local Plan (Section 1) will set the framework for Local Plan (Section 2), which in turn will address how each of the local authorities will seek to meet the housing target, it is vital that a review mechanism is built into Policy SP3 to ensure that the housing requirement can be reviewed should there be any material change in circumstances that could lead to a higher housing requirement being required or an alternative spatial strategy being pursued.

