

Gladman Developments Ltd

**Matter 6 Hearing Statement
North Essex Joint Strategic Plan**

The Proposed New Garden Communities



December 2017

1. **MATTER 6 – THE PROPOSED NEW GARDEN COMMUNITIES**

1.1. **Q3. Is the Sustainability Appraisal of the garden community options robust, particularly with regard to its threshold of 5,000 dwellings?**

- 1.1.1. Gladman consider that the Sustainability Appraisal prepared for the North Essex Strategic Plan (Part 1) is deficient for a number of reasons. These were set out in full in our representations to the Publication Draft of the North Essex Strategic Plan in a report prepared by Lichfields in a report entitled 'North Essex HMA – Sustainability Appraisal Assessment '.
- 1.1.2. Gladman consider that overall, the North Essex authorities assessed an appropriate number of sites, with most of the options assessed including multiple sub-options within them. It appears that the eventual selection of the three garden communities was a result of a planning judgement based on seeking a relatively even distribution across the three authorities, within the most sustainable locations in terms of being close to the main road network and district centres and also based on the feedback received through previous public consultations. However, alternative sites were rejected in both the call for sites process and issues and options stages of the Local Plan on the grounds of scale (i.e. they had capacity for less than 5,000 dwellings).
- 1.1.3. However, the threshold of 5,000 dwellings appears to be entirely arbitrary and is considered potentially unreasonable as it artificially reduces the scope and range of reasonable alternatives considered for garden community locations. It is put forward on the basis that it is the tipping point at which garden communities can provide a secondary school, but the threshold is unjustified.
- 1.1.4. Information contained within The Essex County Council Developers' Guide to Infrastructure Contributions – Revised Edition 2016 states that four forms of entry (600 pupils in the 11 to 16 range), is the minimum secondary school size that would normally be considered financially viable. This is then established to equate to 3,000 houses or a mixed development of over 4,000 houses and flats. The SA however states that "what constituted a reasonable garden community option is 5,000 dwellings... broadly based on that of the threshold for the required provision of a new secondary school for a mixed-use development in the ECC Developer's Guide to Infrastructure Contributions – Revised 2016". Another council within the North Essex HMA and therefore also subject to the Strategic Plan for North Essex SA- Braintree Council- also deem it appropriate to apply the 3,000 threshold identified by Essex County Council by also including evidence at paragraph 2.59 of their Local Plan SA (June 2017), that when assessing sites for housing allocations there should be the assumption that sites with capacity for at least 3,000 dwellings would provide a new secondary school. The scale of development to justify delivery of a secondary school (the apparent logic engaged by the SA to justify the threshold) is actually much lower than the threshold;

- 1.1.5. Sites of less than 5,000 dwellings can deliver new secondary schools. In particular the SA fails to reflect that secondary schools will typically serve a wider catchment than the residential community within which they are sited; pinning such a threshold to delivery of a secondary school fails to reflect the various real world situations where smaller garden villages may still deliver schools that serve (and are funded, based on) the population needs of a wider area. There is also no justification included in any of the SA work as to why the capacity to deliver a secondary school should be the principal criterion for the garden communities of North Essex.
- 1.1.6. The Government define a Garden Village as between 1,500 and 10,000 homes (Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing, 2008). Therefore, the SA takes a different definition as to the scale of garden village that could sustainably contribute towards meeting the housing needs of areas.
- 1.1.7. Notwithstanding the above factors, the SA chooses to use a 5,000 dwelling threshold without justification. The 5,000 dwellings capacity threshold appears arbitrary and unnecessarily high. Overall, by virtue of this single factor, the SA's approach has considerable shortcomings in assessing reasonable alternatives for new garden communities as the sites assessed were based on overly restrictive criteria and therefore failed to address all reasonable alternatives for garden communities across the three local authorities.

1.2. Q7. Should policies SP7, SP8, SP9 and SP10 make more specific requirements as regards the provision and timing of the infrastructure needed for the proposed garden communities?

- 1.2.1. It is considered that the delivery of the garden communities will be complex and it is important for as much information as possible to be included within the North Essex Strategic Plan to ensure their delivery.
- 1.2.2. The provision of infrastructure to facilitate the delivery of these sites is critical to their success and the Councils have highlighted this fact as being fundamental to their incorporation in the Strategic Plan.
- 1.2.3. Therefore, it is important for everyone, not least the communities within which these sites sit, for the policies to contain details of the provision and timing of the infrastructure need for the proposed schemes.

1.3. Q11. Is there evidence to show that each proposed garden community is capable of delivering 2,500 dwellings within the Section 1 Plan period?

- 1.3.1. The provision of garden communities across North Essex is accepted as a positive approach to delivering the not insubstantial housing and employment needs of the three constituent

- authorities. However, from an assessment of the assumptions made in the Strategic Plan regarding the delivery of the garden communities by Strutt and Parker on Gladman's behalf, it is clear that there are a number of factors which could delay their delivery thereby reducing the number of homes that could be delivered in the plan period. The Strutt and Parker report was included with our representations on the Publication Draft Plan.
- 1.3.2. Based upon the findings of this study, it was concluded that housing delivery on any of the sites is unlikely to commence prior to 2025/26 because of a variety of factors which could introduce delay into the delivery process.
 - 1.3.3. The Local Plan timetable is overly ambitious and the need to prepare, examine and adopt the Strategic Plan and subsequent Development Plan Documents for each of the garden communities will be lengthy.
 - 1.3.4. The period allowed for gaining planning approval for the schemes is also ambitious with research undertaken by NLP (Start to Finish: how quickly do large-scale housing sites deliver? 2016) suggesting that the planning approval period for schemes of over 2,000 homes from submission of an outline application to the determination of the first reserved matters application is between 2 and 5 years.
 - 1.3.5. Considering the above timeframe and being optimistic about the progression of the various planning applications for the sites, coupled with the length of time it will take to sign the various S106 legal agreements and discharge pre-commencement conditions, it is considered that delivery of units on the sites will not commence until 2025/26 at the earliest.
 - 1.3.6. The projects are also not yet at the point where a detailed understanding of the infrastructure requirements, costs and delivery is known and this could conceivably lead to additional delays in the process as these issues are investigated and resolved.
 - 1.3.7. The time it takes to set up the local delivery vehicles should also not be underestimated given the level of cross-working and cooperation across various public and private bodies that will be involved.
 - 1.3.8. It is also considered that delivery rates on each of the schemes has been over-estimated having regard to the delivery rates achieved by other schemes across the country. Research undertaken by CLG concluded that schemes with a capacity to deliver in excess of 2,000 units will, on average, deliver fewer than 200 units per annum (average 160 dwellings per annum). Even where schemes do deliver in excess of 200 units this is only usually sustained for short periods (2-4 years).
 - 1.3.9. Other factors such as the ability of the local housing market to absorb significantly increased housing build rates, the physical layout of the sites, trigger points for infrastructure payments and the fluctuations in the economic cycle will all affect delivery rates on the garden communities.

- 1.3.10. It is therefore considered that the housing trajectories for the garden communities showing delivery rates of between 200 and 350 dwellings per annum is overly ambitious.
- 1.3.11. With this conclusion in mind, Strutt and Parker assess that only 5,250 homes will be delivered on the garden communities within the Plan period which is some 2,500 units less than the delivery levels set out in the Strategic Plan.

1.4. Q12. Have appropriate arrangements been made to apportion dwelling numbers at each proposed garden community between the respective housing requirements of the relevant local planning authorities?

- 1.4.1. Paragraph 1.108 of the Plan states that “each of the three proposed garden communities is planned to deliver 2,500 dwellings during the Local Plan to 2033. Delivery of 2,500 dwellings in the cross-border garden communities, no matter where they are physically built, within the Local Plan period to 2033, will be attributed as set out in section 2 of each of the individual Local Plans, or if more dwellings are built then 50:50 between the two districts concerned.” Gladman considers that such a manipulation of completions is artificial and is totally unjustified and unsupported by the NPPF and PPG. Dwelling completions can only accrue to the authority in which they are physically located. Bearing in mind that the location of the new garden communities are only indicative ‘broad locations’ at this stage, there is a possibility that when the extent of these proposed developments are finalised, the proportion of each site that is within one authority may actually be very small and its housing capacity may bear very little relationship with the above mentioned mechanism set out in the Local Plan.

1.5. Q17. Is the proposal to prepare subsequent Development Plan Documents (DPDs) setting out design, development and phasing principles for each garden community, justified?

- 1.5.1. Gladman do not comment on the validity or necessity to prepare separate DPDs for each garden community. However, the preparation of such documents is a lengthy process of preparation, consultation and public examination before adoption. This process therefore needs to be taken into account when determining when units on the sites will begin to be delivered.

1.6. Q20. Are the proposed governance and delivery mechanisms for the garden communities, potentially involving Local Delivery Vehicles, appropriate?

- 1.6.1. The time taken to set up the local delivery vehicles should not be underestimated given that it will involve cross-working across a number of public and private bodies. This should be a key consideration when determining a realistic delivery trajectory for each scheme.