

PLANNING POLICY AND LOCAL PLAN COMMITTEE

8 JUNE 2020

REPORT OF THE CORPORATE DIRECTOR: PLACE AND ECONOMY

A.1 – UPDATED HOUSING SUPPLY POSITION AND HOUSING TRAJECTORY

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PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To report, to the Planning Policy and Local Plan Committee:

- The Planning Inspector's latest conclusions on the housing requirement for Tendring;
- The number of new homes built in Tendring during the 2019/20 financial year and the up-dated year-by-year 'trajectory' for future housebuilding (taking the impact of COVID-19 into account);
- The current housing land supply position (the 'five-year' supply); and
- The implications for Section 2 of the Local Plan and the determination of planning applications.

EXECUTIVE SUMMARY

Key Points

- The Planning Inspector for the Section 1 Local Plan has again confirmed 550 homes per year as a 'sound' housing requirement for Tendring.
- 784 new homes were built in the 2019/20 financial year, meaning that the housing requirement has been achieved for the fourth year running – however, the COVID-19 coronavirus outbreak is expected to have a significant impact on the rate of housebuilding in 2020/21 and future years.
- Even with adjustments for the impact of the COVID-19, there is still sufficient land allocated for housing development in the emerging Local Plan, or with planning permission, to comfortably achieve the district's housing requirement up to 2033 without the need for any additional sites.
- The Council can only demonstrate a 4.45 year supply of deliverable housing sites against the government requirement to demonstrate a 5 year supply – but this is only because of a technicality within government planning policy which requires Councils to measure housing delivery against nationally set targets until such time that their Local Plan is formally adopted. This has implications for the way the Council deals with planning applications.

Housing Requirement

Following the further examination hearings for Section 1 of the Local Plan, the Planning Inspector has concluded, in his 15 May 2020 letter, that the 'objectively assessed housing need' (OAN) of 550 homes a year, as set out in the emerging plan, is still based on sound evidence and there is no need to increase the figure in response to objections from some developers and landowners. The housing requirement for the period of the Local Plan 2013-2033 should therefore remain at 11,000 homes. With approximately 3,600 homes already built between 2013 and 2020, the remaining requirement between now and 2033 stands at approximately 7,400.

The Planning Inspector has also concluded that the Tendring Colchester Borders Garden Community can reasonably be expected to contribute 1,000 homes towards Tendring's housing requirement between now and 2033; if the North Essex Authorities decided to proceed with that proposal.

Housing Completions and Future Trajectory

In the period 1 April 2019 to 31 March 2020, a net total of 784 new homes were completed in Tendring. This means that the housebuilding target of 550 homes a year has now been achieved for a fourth year in succession. However, the COVID-19 coronavirus outbreak is already having a significant impact on rates of housebuilding and this is likely to continue some way into the future.

Officers have updated the Council's 'Strategic Housing Land Availability Assessment' (SHLAA) which contains a trajectory for future housing building and adjustments to predicted housing delivery have been made in response to COVID-19 and various other factors and information. It is likely that housebuilding will fall to around 550 in 2020/21 financial year, but that delivery will gradually improve over subsequent years.

Implications for the Local Plan

When the Local Plan was submitted to the Secretary of State in October 2017, the housing supply figures set out in the various tables within the Plan provided a fairly accurate account of the position at that time. However, in the two and a half years that have passed since the Plan was submitted, more houses have been built, more sites have obtained planning permission (either through decisions of the Council or through the appeal process) and the anticipated timescales for certain developments have needed to be reviewed – particularly in light of the potential impacts of the COVID-19 outbreak, the Planning Inspector's conclusions on Section 1 of the Local Plan and more up to date information supplied by developers and landowners.

It is therefore proposed that, ahead of the examination of Section 2 of the Local Plan, the Council shall submit a 'topic paper' to the Planning Inspector which updates all of the housing figures in the Local Plan. The Planning Policy and Local Plan Committee is asked to agree the proposed updates, which include 'pushing back' the expected timescales for some of the larger developments in the Local Plan which are yet to obtain planning permission and for which more time is likely to be required

for master planning and negotiations with landowners and developers. The ‘Hartley Gardens’ development proposed for north-west Clacton is the most notable of the developments that is expected to require more time for landowner discussions and master planning.

The good news is that, even with adjustments for COVID-19, the updated SHLAA demonstrates that the sites allocated for housing development in the emerging Local Plan, along with sites that have already obtained planning permission, are more than sufficient to deliver the remaining 7,400 homes needed between now and 2033 – incorporating a healthy level of flexibility of ‘headroom’. There is subsequently no need, at this time, to include any additional sites in the Local Plan for housing.

Five Year Housing Supply and Decision Making

The government requires Councils to demonstrate an ongoing ‘five year supply’ of deliverable housing sites to ensure that they are well placed to meet their future housing needs. However, in February 2019, the government made amendments to the National Planning Policy Framework (NPPF) which affects the way Councils calculate whether or not they can identify a five year housing supply – which has particularly unfortunate implications for determining planning applications in Tendring.

Where a Council’s adopted Local Plan housing policies are more than five years old (as is the case in Tendring), they are required to calculate housing supply against a ‘local housing need’ figure generated using the government’s standard methodology which, for Tendring, means a housing target of 865 homes a year as opposed to the 550 homes a year target in the emerging (but yet to be adopted) Local Plan. The significantly higher figure is based on official population and household projections which, for Tendring, are known to contain errors and are considered to be substantially ‘over-inflated’.

Despite the Planning Inspector’s endorsement of 550 homes a year as the housing requirement for Tendring, and the very strong performance against that target in recent years, the change in government planning policy means the Council can technically only demonstrate a 4.45 year supply of deliverable housing sites. Because of this, until Section 1 of the Local Plan is formally adopted or the Council is otherwise able to demonstrate a five year housing supply against the higher figure, planning applications for new housing will have to be considered on their merits – weighing up the harm against the benefits, even where they are contrary to the emerging Local Plan.

RECOMMENDATION

That the Local Plan Committee endorses the content of this report and the new Strategic Housing Land Availability Assessment (SHLAA) (attached as Appendix 2)) as evidence to support the deliverability of housing proposals in the new Local Plan and to demonstrate an up-to-date housing land supply position for the purposes of updating the Local Plan (as set out in Appendix 1), determining planning applications and contesting planning appeals.

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

Maintaining and demonstrating an ongoing five-year supply of deliverable housing sites is key to the Council's ability to control the pattern of housing growth across the district and to determining planning applications in line with the policies of the Local Plan.

RESOURCES AND RISK

The annual housing survey, the five-year housing land supply calculation and the updated housing trajectory have all been undertaken by the Council's Strategic Planning and Place Team within the agreed 'LDF Budget'.

The main risk to the housing supply calculations is a challenge to the figures by third-party developers promoting their sites either through the Local Plan examination or through the planning appeal process. To minimise this risk, Officers have generally taken a cautious/conservative approach to the expected delivery of housing on sites to make it difficult for developers to successfully challenge the figures on the basis of them being too optimistic.

Also, if the Council is unable to demonstrate, through the examination process, that the sites proposed in Section 2 of the Local Plan can reasonably deliver objectively assessed housing requirements in full, the Local Plan Inspector could delay the adoption of the plan and require the Council to identify additional sites for development.

The main risk to housing delivery and achieving and maintaining an ongoing five-year supply of housing land is the housing market in the District. If the market is not buoyant, insufficient completions will be achieved, adding to the shortfall that has to be recovered. In addition, the trajectory of future housing delivery would have to be adjusted to reflect longer lead-in times and/or slower build-out rates.

The COVID-19 coronavirus outbreak in particular is expected to have a significant impact on housebuilding in future years and Officers have made what are considered to be sensible adjustments to the projections for housebuilding – although third parties may still seek to challenge the adjusted figures in order to progress their own development interests. Wherever possible, Officers' assumptions about housing delivery on certain sites have been reached in consultation with relevant landowners or developers and through the application of reasonable judgement.

LEGAL

The new National Planning Policy Framework (NPPF) published in July 2018 requires Councils to boost, significantly, the supply of housing by identifying sufficient land with their Local Plans to meet their housing requirements. They are also required to identify and update, annually, a supply of specific 'deliverable' sites sufficient to provide five years' worth of housing against their housing

requirements, plus an appropriate buffer. Updates to the NPPF in February 2019 have clarified that housing supply has to be measured against a 'local housing need' figure derived using the government's 'standard method' unless adopted Local Plan housing policies are less than five years old.

From November 2018, housing delivery has also had to be measured against a new 'Housing Delivery Test' which looks at the number of homes constructed, against housing requirements, over the previous three years.

In the event that a Council is unable to demonstrate a five-year supply of deliverable housing land, its policies for the supply of housing cannot be considered up to date. Councils are then expected to grant planning permission for housing developments (even if they are contrary to the Local Plan) unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole, or specific paragraphs in the NPPF indicate that development should be restricted.

OTHER IMPLICATIONS

Area or Ward affected: All wards.

Consultation/Public Engagement: None – although the assumptions about housing delivery set out in the SHLAA have been informed through consultation with a number of landowners and developers. Officers will keep the assumptions under continual review and will produce updated versions of the SHLAA on an annual basis, or more frequently if required.

PART 3 – SUPPORTING INFORMATION

Housing requirement

For a number of years, there has been much debate and argument about how many new homes are required in Tendring to meet the needs of a growing population and therefore how much land is required for housing development. The issue of housing numbers and housing development has undoubtedly been the most challenging issue the Council has had to address through the Local Plan process – particularly given the high level of public objection to major housing developments and the very unusual problem that Tendring has in interpreting projections for future population and household growth.

The 'objectively assessed housing need' (OAN) for Tendring, as set out in the emerging Local Plan, is 550 homes a year – or 11,000 homes over the period 2013 to 2033. This figure makes an adjustment for 'Unattributable Population Change' (UPC) which arose from errors in either the 2001 or the 2011 Census and/or the government's population projections (particularly in their assumptions about migration). UPC has a significant effect on housing projections for Tendring compared to vast

majority of local authorities across the country and Tendring is therefore considered to be an exceptional case where a bespoke approach has been required.

The Planning Inspector for the Section 1 Local Plan examination agreed with the Council, in his interim letter of June 2018, that the figure of 550 homes a year to be based on sound evidence. As part of the further hearing sessions in January 2020, the Inspector invited comments from third parties on whether or not anything had changed since his 2018 letter to justify any alterations to the housing requirement figures and there was a debate on this issue as part of the hearing sessions.

The Inspector has now written the North Essex Authorities with his findings on the soundness of the Section 1 Local Plan, whilst the Councils will need to agree a way forward for the Local Plan in light of some of the Inspector's findings, he has concluded, in his 15 May 2020 letter, that the target of 550 homes a year for Tendring should remain unchanged – re-affirming his previous advice.

Housing completions

Earlier this year, Officers undertook the annual survey of housing completions for the period 1 April 2019 to 31 March 2020. This involved updating records of sites with planning permission for housing and recording the number of dwellings that had been created on each of those sites over that 12 month period. This was achieved through a combination of site visits, information requested from and provided by developers and use of building control completion data.

The 'net dwelling stock increase' (or housing completions minus losses) for the 2019/20 financial year is recorded as **784**. This 'net' figure takes into account demolitions and other losses of existing homes. This exceeds the housing requirement for Tendring of 550 homes a year.

In each of the first three years of the plan period (2013/14, 2014/15 and 2015/16), actual completions fell short of this requirement with just 204, 267 and 245 completions respectively – amassing a total shortfall of 934. However, the achievement of 658 completions in 2016/17, 565 completions in 2017/18, 915 completions in 2018/19 and 784 completions in 2019/20 has helped to reduce the shortfall to just 212.

The significant improvement in house building in the last four years reflects improvements in housing market conditions (up until very recently) since the 2008 economic downturn, the increase in the number of housing sites gaining planning permission and continued strong progress on some of the district's larger housing developments including Finches Park in Kirby Cross, Hamford Park in Walton, Lawford Park in Lawford, River Reach in Mistley, Colne Gardens in Brightlingsea, Avellana Place in Ardleigh, Staunton Gate in Alresford, Fusiliers Green in Great Bentley, Henderson Park in Thorpe le Soken and Milers Green in Weeley Heath.

Of the 784 completions recorded for 2019/20, 650 took place on larger development sites of 10 or more dwellings with 134 on smaller developments of 9 or fewer – although the latter is likely to be an under-estimate of the actual completions because Officers were unable to undertake as comprehensive survey of completions on small sites due to the restrictions on unnecessary imposed

following the outbreak of the COVID-19 coronavirus. The 'count' of 134 dwellings on smaller development is therefore primarily based on desk top information including Building Control Records. Any unaccounted completions are likely to be picked up when the exercise is repeated in April 2021, and added into next year's totals.

Strategic Housing Land Availability Assessment (SHLAA) and Housing Trajectory

A Strategic Housing Land Availability Assessment (hereafter referred to as a 'SHLAA') is an essential part of the 'evidence base' that is needed to inform and underpin decisions on allocating sites for housing in Local Plans. The primary purpose of the SHLAA is to:

- identify sites and broad locations with potential for housing development;
- assess their housing potential; and
- assess their suitability for development and the likelihood of development coming forward.

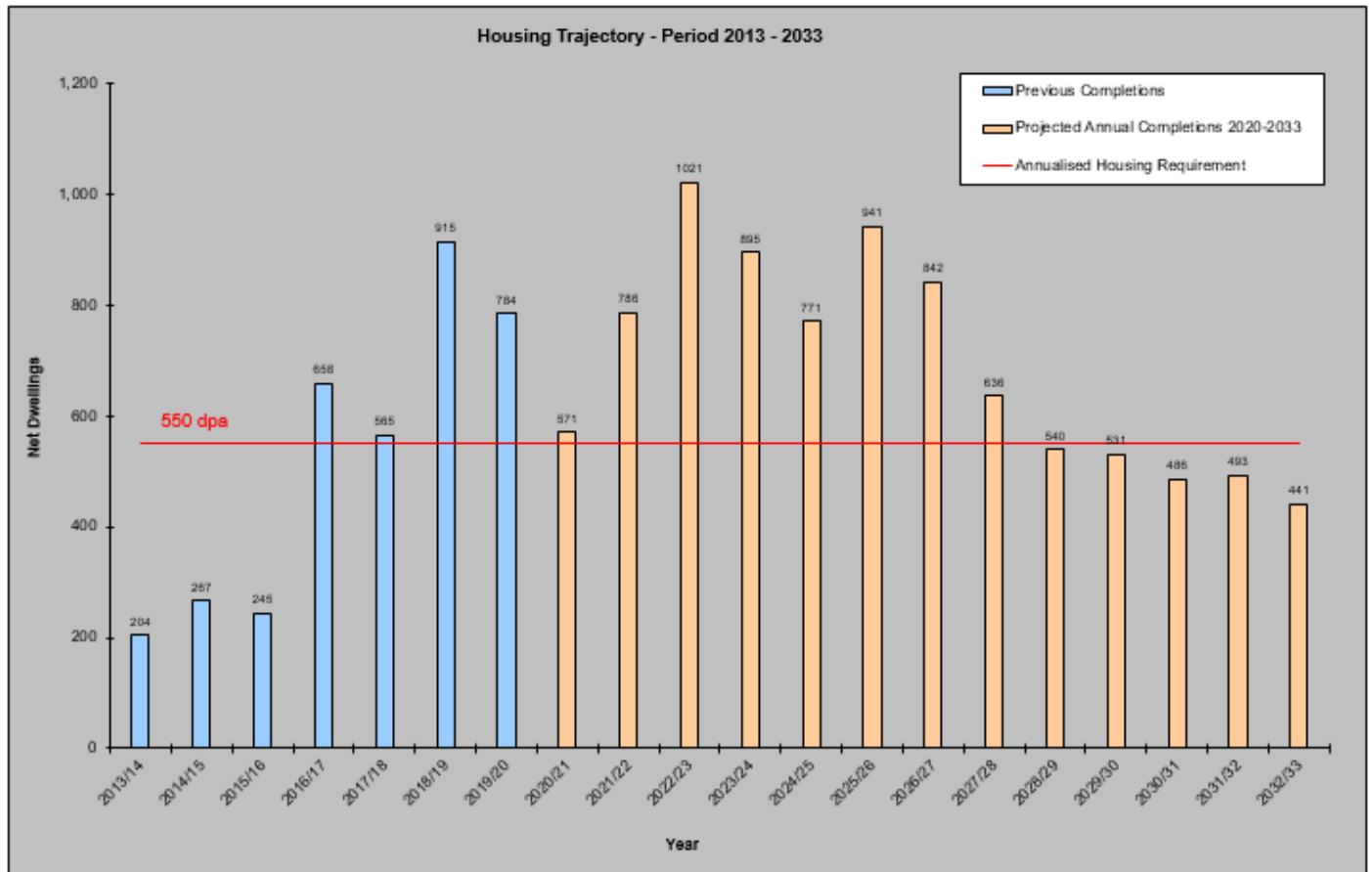
The assessment (attached as Appendix 2) has been updated to a 1st April 2020 base date in order to reflect the very latest available information on housing developments in the district, including planning decisions and appeal decisions which have a significant bearing on the assumptions on housing delivery currently set out in the Local Plan.

This assessment identifies that through a combination of dwellings completed since 2013, large sites with planning permission for housing development, small sites and windfall sites and sites specifically allocated in the emerging Local Plan, the objectively assessed requirement to deliver 11,000 homes between 2013 and 2033 can still be met and comfortably exceeded, by around 1,600 homes.

This 'headroom' is potentially very useful in demonstrating to the Local Plan Inspector examining Section 2 of the Local Plan that even if certain sites do not come forward for development in the timescales envisaged, there is still a reasonable prospect that the district's housing requirements up to 2033 will be achieved. For example, the largest and most complex residential and mixed-use developments in the emerging Local Plan are the Tendring Colchester Borders Garden Community and the Hartley Gardens development in north west Clacton. If either one of these developments were delayed, or failed to come forward at all during the remainder of the plan period to 2033, there is still sufficient headroom in the overall supply to meet the housing requirement. This additional flexibility and headroom helps to minimise the likelihood of the Inspector requiring the Council to include additional sites in the Local Plan.

The National Planning Policy Framework requires Councils to ensure their Local Plans meet the full objectively assessed needs for market and affordable housing. As well as identifying and updating a supply of specific deliverable sites to provide five years' worth of housing (plus the appropriate buffer), Councils need to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. The expected rate of housing delivery has to be illustrated through a 'housing trajectory' for the plan period.

The updated information contained within the new SHLAA has been fed into an overall trajectory for housing growth over the plan period which is set out below:



The trajectory shows the low level of housing completions in the years 2013/14 to 2015/16 followed by significant improvement in performance recorded for 2016/17 to 2019/20. At the time of writing, early indications would suggest that housing delivery will fall significantly in 2020/21 despite strong progress on many housing sites over the last year. This is because the coronavirus (COVID-19) outbreak is expected to have a significant impact on housebuilding both in the short term for the remainder of 2020/21 as a result of site closures and social distancing measures; and, potentially, in the medium term in subsequent years due to the related economic impacts. For 2020/21, housing completions are predicted to drop into the 500s with a staged recovery in the following years.

From 2022/23 there is expected to five years of strong housing delivery generally between 800 and 1,000 completions a year. From 2028/29, housebuilding is expected to stabilise between 500 and 600 homes a year, more closely in line with the annual housing requirement – by which time some of the larger housing allocations in the Local Plan are expected to contribute strongly towards housing supply – including the new Garden Community on the Tendring/Colchester border and the major developments around Clacton.

The Five Year Supply and implications for determining planning applications

Requirements under the updated NPPF

A new version of the National Planning Policy Framework (NPPF) was published in July 2018. It requires Councils to boost, significantly, the supply of housing. Councils still have to identify and update, annually, a supply of specific 'deliverable' sites sufficient to provide five years' worth of housing against their housing requirements. It also requires Councils to include an additional 'buffer' of either:

- a) *"5% to ensure choice and competition in the market for land; or*
- b) *10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- c) *20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply."*

The NPPF defines 'significant under delivery' as being below 85% of the housing requirement over the previous three years. Up until February 2019, the Council had been arguing (with success in planning appeals) that it could demonstrate a five year housing supply against the Local Plan target of 550 homes a year and that it could also demonstrate that delivery in the last three years had been in excess of the 85% threshold. However, in February 2019, the government published amendments to the NPPF which have had significant implications for the way housing supply is calculated in Tendring.

Paragraph 73 in the NPPF states: *"Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old."* Because this Council last adopted a Local Plan in 2007, its strategic housing policies are more than five years old and therefore housing supply has to be measured against its 'local housing need' which, up until February 2019, the Council had taken to be the 550 homes a year target set out in the emerging Local Plan and endorsed by the Planning Inspector following the examination of the Section 1 Plan. However, in February 2019, the government introduced additional wording into footnote 37 of the NPPF which states: *"Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance"*. For Tendring, the standard method for calculating local housing need generates a requirement of 865 homes a year which is more than 300 a year more than the target in the emerging Local Plan.

The standard method relies on government household projections which, for Tendring, have been proven to be flawed as they are infected by discrepancies in census data and mid-year population projections which occurred between 2001 and 2011 known as 'unattributable population change' (UPC). Even though UPC has been demonstrated (by leading demographic consultants on behalf of

the Council) to be a problem in Tendring and both the Planning Inspector for the Local Plan and numerous appeal Inspectors have accepted the Council's position on UPC, the change to NPPF nonetheless requires the Council to calculate housing supply using the higher figure – at least until the new Local Plan housing policies are formally adopted.

In determining whether a five year supply of deliverable housing sites can be demonstrated, the NPPF in Annex 2 includes clear guidance on what can and cannot be considered a 'deliverable site'. It states: *"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years"*.

Critically if a Council cannot identify a five-year supply of deliverable housing sites (plus the appropriate buffer), its policies for the supply of housing cannot be considered up to date and the 'presumption in favour of sustainable development' applies. This requires Councils to consider all housing development proposals on their merits, even if they are contrary to the Local Plan. There is an expectation that planning permission will be granted unless the adverse impacts significantly and demonstrably outweigh the benefits. This is now commonly referred to as the 'tilted balance'.

From November 2018, as well as having to demonstrate a five-year supply of deliverable housing sites, Councils have also needed to demonstrate that they are meeting the new 'housing delivery test' (HDT) in the NPPF. It requires housing delivery over the previous three financial years to be measured against the housing requirement and where delivery is 'substantially below the housing requirement', the 'tilted balance' is engaged.

The Council's performance in housing delivery over the last three years has been very strong when measured against the requirement of 550 homes a year in the Local Plan and has also been fairly strong against the government's higher figure of 865. The Council is therefore currently allowed to apply the lower 5% buffer in its housing supply calculation – although this may have to be reviewed again in November 2020 when the next round of HDT figures are published.

Updating the figures

Officers have re-run the housing supply calculation to a 1st April 2020 base-date to provide two calculations. One measured against the requirement of 550 homes a year as set out in the emerging Local Plan and accepted by the Local Plan Inspector as being soundly based; and another measured against the requirement of 865 homes a year generated by the government's standard method of calculating local housing need.

The updated calculations are based on the evidence and assumptions contained within the new SHLAA. The calculations within the SHLAA (chapter 7) give a housing supply position of **6.44** years against the Local Plan figure and **4.41** years against the figure derived from the standard methodology. These figures are set out in the following table:

Five Year Requirement and Supply	Local Plan OAN of 550 homes a year	'Local Housing Need' figure of 865 homes a year (standard method)
Requirement 2020/21 – 2024/25	2,750 (550 x 5)	4,325 (865 x 5)
Shortfall 2013/14 – 2019/20	212	N/a
Sub-Total	2,962	4,325
Plus 5% buffer	148	216
Total Requirement	3,110	4,541
Supply from large site commitments	3,323	3,323
Supply from emerging allocations	0	0
Supply from small windfall sites	680	680
Total supply of Homes – Units	4,044	4,044
Total five- year supply of Homes - %	130%	89%
Total supply of Homes – Years	6.50	4.45

Implications and relevant appeal decisions

Since the February 2019 changes to the NPPF, the Council has had to accept that it cannot technically demonstrate a five year housing supply and therefore the 'tilted balance' is engaged and planning applications for housing development have had to be considered on their merits – weighing up adverse impacts against benefits. However, in determining such planning applications for housing development, the Local Plan Inspector's 2018 endorsement of the emerging Local Plan housing figure of 550 homes a year has been treated by Officers as a material consideration to be weighed in the balance. The Local Plan Inspector's acknowledgement that UPC is a genuine factor that has infected the government's household projections clearly supports the Council's position that, in real terms, there is no shortfall in the Council's five year housing supply and, on that basis, the amount of weight that applies to the 'benefits' of additional housing development should reflect that. The fact that the Planning Inspector has reconfirmed his endorsement of the 550 homes a year figure in his latest letter should add further strength to the Council's argument.

This approach was successfully defended by the Council and its legal representatives in the recent appeal for 85 homes on land off Edenside, Bloomfield Avenue, Frinton on Sea where the Inspector dismissed the appeal, but some other Inspectors have rejected the argument. The inconsistent

approach being adopted by appeal Inspectors makes it very challenging for the Council to defend its position in response to speculative planning applications – but Officers intend to continue arguing that UPC is a material consideration that should be weighed in the balance when determining planning applications for housing until the Council can formally adopt the figures in the new Local Plan.

Suggested updates to the Local Plan

In the two and a half years since the Council's Local Plan was submitted to the Secretary of State to begin the examination process, there have been significant changes in the housing supply position in Tendring resulting from actual housing completions between 2017 and 2020 and a number of sites obtaining planning permission for housing development either from the Council or on appeal (including sites allocated in the plan and others that are not).

In preparation for the examination of Section 2 of the Local Plan, Officers are planning to prepare a 'topic paper' to explain to the Planning Inspector how the housing supply situation has changed and to recommend updates to the figures and tables in the Local Plan to better reflect the most up to date position. The latest SHLAA document provides the evidence behind the changes that are required.

Some of the notable changes include the fact that, of the 11,000 homes needed between 2013 and 2033, some 3,600 have already been built – leaving just 7,400 to be built over the next 13 years. Furthermore, a number of sites allocated in the Local Plan for residential and mixed used development have now either obtained planning permission or a Planning Committee resolution to grant planning permission – these include large schemes such as the 'Rouses Farm' development in Clacton, the 'Low Road' development in Dovercourt, the 'Colne Gardens' development in Brigtingsea and the 'Barleyfields' development in Weeley. There are also other sites that Officers no longer believe are likely to be deliverable in the plan period and need not feature in the Local Plan.

Large sites with planning permission or a Committee resolution to grant permission are now expected to deliver 5,800 of the 7,400 homes that are required between now and 2033. Officers have also re-calculated the 'small sites' or 'windfall' figures and their contribution is now expected to be in the order of 1,300 homes between 2020 and 2023. The above leaves just 300 homes needing to be delivered through sites allocated in the Local Plan, which is why there is significant flexibility and headroom in the supply.

The sites allocated for residential and mixed-use development in the emerging Local Plan which are yet to obtain planning permission include, most notably, the Tendring Colchester Borders Garden Community, the Hartley Gardens development in north west Clacton and the Phase 2 'Oakwood Park' development north of the Clacton Shopping Village and Gorse Lane Industrial Estate.

In his 15 May 2020 letter, the Local Plan Inspector has concluded that the Tendring Colchester Borders Garden Community is viable and deliverable and could deliver 2,000 homes up to 2033, of which 50% i.e. 1,000 could count towards Tendring's total. Whilst the North Essex Authorities are

considering the next steps in light of other findings in the Inspector's letter, Officers suggest that the Section 2 Local Plan ought to be updated to reflect the Inspector's advice on this particular site.

It is also suggested that the predicted timescales for the 'Hartley Gardens' development in north west Clacton are adjusted to push that development back to 2028/29, meaning that just 210 of the 1,700 would be expected to be built in the plan period to 2033, with the remaining 1,490 coming forward after 2033. This will allow additional time 1) for preparing a master plan for the area in partnership and consultation with the multiple landowners with an interest in the site, and 2) for funding and securing any necessary 'up-front' infrastructure, such as the proposed link road. With the suggested amendments to the Local Plan, there is sufficient headroom within the housing supply to achieve the housing requirement for the period up to 2033 even if, in the worst case scenario, the Hartley Gardens development was delayed further. This will help the Council to demonstrate to the Planning Inspector that the plan is resilient to changes in the economy and the housing market and is not 'overly-dependent' on any potentially complex scheme which might be vulnerable to delay.

The Phase 2 Oakwood Park development has also been pushed back in the trajectory so that it corresponds with the expected timescales for Phase 1 (the Flint Grange development by Persimmon Homes off Thorpe Road). Under the revised trajectory, 435 of the total 918 dwellings (around half) would be expected on the site up to 2033 with the remaining 483 taking place beyond 2033.

In the revised trajectory, sites allocated in the emerging Local Plan (which are yet to obtain planning permission and which including the Garden Community and the Hartley Gardens development amongst others) are expected to deliver around 1,900 homes between 2020 and 2033, which represents an 'over-allocation' of around 1,600 homes.

The suggested amendments to the tables and figures in the Local Plan are set out in Appendix 1 to this report.

APPENDICES

Appendix 1 – Suggested amendments to Tables LP1 and LP2 and Policy LP1

Appendix 2 – Strategic Housing Land Availability Assessment (SHLAA) (May 2020)

Suggested amendments to Tables LP1 and LP2 and Policy LP1

Table LP1: Housing Requirement for the period 1/4/13 – 31/3/33

Current version

A – Annual Net Dwellings Required – Reported Years from Base Date	
2013/14 to 2032/33	550 x 20
Total	11,000
B – Net Completions – Reported Years from Base Date	
2013/14	204
2014/15	267
2015/16	245
2016/17	658
Total	1,374
C – Shortfall – Reported Years from Base Date	
Total	826
D – Net dwellings from Base Date still required	
Total	9,626

Suggested amended version

A – Annual Net Dwellings Required – Reported Years from Base Date	
2013/14 to 2032/33	550 x 20
Total	11,000
B – Net Completions – Reported Years from Base Date	
2013/14	204
2014/15	267
2015/16	245
2016/17	658
2017/18	565
2018/19	915
2019/20	784
Total	3,638
C – Shortfall – Reported Years from Base Date	
Total	212
D – Net dwellings from Base Date still required	
Total	7,362

Table LP2 – Local Plan Housing Allocations

Current version

Site	Total housing numbers	2018/19 to 2022/23	2023/24 to 2027/28	2028/29 to 2032/33	And Beyond	Reference
Sites of 10 or more Homes with Planning Permission (with/without s106)	4,796	3,933	746	100	17	
Sites of 9 or less homes/windfall	1,399	864	361	174	0	
EDME Maltings	150	0	0	150	0	SAMU1
Hartley Gardens Village	1,700	0	300	300	1,100	SAMU2
Oakwood Park	750	0	300	300	250	SAMU3
Rouses Farm	850	0	300	300	250	SAMU4
Land South of Council Offices	280	0	200	80	0	SAMU5
Greenfield Farm	164	0	100	64	0	SAH1
Land West of Low Road	300	0	100	100	100	SAH2
Robinson Road	100	0	100	0	0	SAH3
Tendring Colchester Borders Garden Community	3,500-4,500	0	500	750	2,250-3,250	SP7
Land at Weeley Council Offices	24	0	0	24	0	MSA1
Land off Cotswold Road	12	0	12	0	0	MSA2
Orchard Works site rear of London Road	20	0	20	0	0	MSA3
Land rear of 522-524 St. Johns Road	43	0	43	0	0	MSA4
Station Gateway development	60	0	0	60	0	MSA5
Former Tendring 100 Waterworks Site, Clacton	90	0	90	0	0	MSA6
Mayflower Primary School	15	0	15	0	0	MSA7
Land at adjoining Harwich and Parkeston Football club, Dovercourt	89	0	0	89	0	MSA8
Old Town Hall site	15	0	15	0	0	MSA9
Southcliffe Trailer Park	15	0	15	0	0	MSA10
Station Yard	40	0	40	0	0	MSA11
Land at the Farm, Kirby Road, Walton	47	0	0	47	0	MSA12
Montana Roundabout	35	0	35	0	0	MSA14
TOTALS	14,494-15,494	4,797	3,339	2,491	3867-4,867	
Total in Plan Period	10,627					

Suggested amended version

Site	Total housing numbers	2020/20 to 2024/25	2025/26 to 2029/30	2030/31 to 2032/33	And Beyond	Reference
Sites of 10 or more Homes with Planning Permission (with/without s106)	6,462	3,364	1,942	494	662	
Sites of 9 or less homes/windfall	1,260	680	419	161	0	
Hartley Gardens, Clacton	1,700	0	60	150	1,490	SAMU2
Oakwood Park, Clacton	918	0	195	240	483	SAMU3
Tendring Colchester Borders Garden Community	3,500-4,500	0	625	375	2,500-3,500	SP7
Land at Weeley Council Offices	24	0	24	0	0	MSA1
Former Tendring 100 Waterworks Site, Clacton	90	0	90	0	0	MSA6
Land at adjoining Harwich and Parkeston Football club, <u>Dovercourt</u>	48	0	48	0	0	MSA8
Station Yard/Avon Works, Walton	40	0	40	0	0	MSA11
Land at the Farm, Kirby Road, Walton	47	0	47	0	0	MSA12
TOTALS	14,089-15,089	4,044	3,490	1,420	4885-5,885	
Total in Plan Period	8,954					

Policy LP1: Housing Supply

Current version

Policy LP 1

HOUSING SUPPLY

The Council will work with the development industry and other partners to deliver a minimum new homes increase of 11,000 (net) between 1 April 2013 and 31 March 2033 to support economic growth and meet objectively assessed requirements for future housing in the District. This supply of new homes will be delivered from the following sources:

Supply Source to March 2033	Totals
Net Dwelling Completions 2013-2017	1,374
Large Sites with Planning Consents (with/without signed S106 agreements)	4,779
Small Sites with Planning Consents (with Trend Based Completions)	1,399
Strategic Allocations – Mixed Use (SAMU Policies)	2,230
Strategic Allocations – Housing (SAH Policies)	464
Medium Sized Allocations (MSA Policies)	505
Tendring Colchester Borders Garden Community	1,250
Totals	12,001

Suggest amended version

Policy LP 1 [Alternative format]

HOUSING SUPPLY

The Council will work with the development industry and other partners to deliver a minimum new homes increase of 11,000 (net) between 1 April 2013 and 31 March 2033 to support economic growth and meet objectively assessed requirements for future housing in the District. This supply of new homes will be delivered from the following sources:

Supply Source to March 2033	Totals
Net Dwelling Completions 2013-2020	3,638
Large Sites with Planning Consents (with/without signed S106 agreements)	5,800
Small Sites with Planning Consents (with Trend Based Completions)	1,260
Development at Hartley Gardens, Clacton (Policy SAMU2)	210
Development at Oakwood Park, Clacton (Policy SAMU3)	435
Medium Sized Allocations (MSA Policies)	249
Tendring Colchester Borders Garden Community	1,000
Totals	12,592