

# Response to Inspector's Matters, Issues and Questions (MIQs)

## On behalf of Persimmon Homes

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### Matter 6: Strategic Housing Growth – Reserve Sites S2 (H1, H2, I1 and I2)

**Question 1:** Persimmon considers that Reserve Site RE2 North of Scraley Road should be a Strategic Allocation to make the Local Plan sound. This is because Policy S2 (SD04b) still does not establish an appropriate, clear, effective and soundly based distribution of development and growth that is sound in accordance with the NPPF. This is because:-

- The existing commitments of 497 dwellings is reliant on the implementation of a large number of small medium and large sites with permission (Appendices B, C and D of EB096b). These Appendices do not include the expiry dates of these permissions to see how vulnerable the delivery of committed sites is.
- The objectively assessed housing need figure should be recording completion rates in accordance with the 310 dpa proposed evidence base (EB098a) housing needs figure, from 2013/14, as the East of England Plan housing targets expired in 2012/13. The 120 dwellings per annum target is no longer an appropriate annual housing target as demonstrated by the Council's evidence base.
- As the Council has not provided further evidence on North Fambridge housing delivery and suitability to answer the Inspector's questions on Matter 7, there is further vulnerability regarding the delivery of 154 housing units over the first five year period of the Plan.
- The Council also relies on an intensive programme of the submission and approval of applications set out in Appendix F of EB096b, which are not materialising at the rate the Council anticipates. All delays to the approval of planning permissions will affect the delivery rate and achievement of a deliverable five year housing land supply.

Due to this vulnerability in achieving the Council's proposed five year housing land supply, Reserve Site RE2 North of Scraley Road should become a Strategic Allocation, in order that the Council can demonstrate a robust five year housing land supply.

- Question 2:** The appropriate contingency to handle any uncertainties to the late provision of critical infrastructure for North Heybridge Garden Suburb is as stated in answer to Question 1 above. In addition, the Council's proposed modification to Policy S2 in SD04b Ref 047 is not acceptable, in respect of the monitor and review suggestions regarding Policy S2, Persimmon consider that this is not acceptable as a 20% deviation in housing delivery will begin to significantly deflate the Council's ability to demonstrate a deliverable five year housing land supply and catch up year on year to any shortfall of housing delivery. Given that the Council is only suggesting that a 5% buffer to the five year housing land supply is necessary given its historic housing delivery rate on a low housing delivery target, the deviation rate should be reduced to 5% to ensure that the Council can quickly catch up if there is a housing shortfall and continue to demonstrate a deliverable five year housing land supply.
- Question 3:** Persimmon considers that given the deliverability of Reserve Site RE2 North of Scraley Road (acknowledged in evidence), that this site should be made a Strategic Allocation now to provide a suitable buffer in the event that committed sites, strategic and allocated sites do not materialise as planned and referred to in the Council's evidence base and planning policies. There is considerable pressure on the Council to consider and review a large number of applications, the scale of which it has not dealt with before. If the release of reserved sites is subject to the Council conducting a formal review of delivery rates this will further compound the lack of housing delivery. Allocation of Reserve Site RE2 now will allow an appropriate buffer to avoid this scenario occurring.
- Question 4:** Persimmon confirms that Reserve Site RE 2 North of Scraley Road can be delivered as soon as planning permission is granted and there is nothing preventing Persimmon submitting an application for development now. The Inspector should note the evidence submitted regarding RE 2, the Chigborough Lakes Local Wildlife Site (Ma63 Appendix 5 of Local Plan) and Persimmons ministerial evidence that the designation is erroneous for site RE 2.
- Question 5:** The same points as set out in questions 1, 2 and 3 above are relevant and apply here to answer the Inspector's question.
- Question 6:** No as referred to above.
- Question 7:** Site RE 2 North of Scraley Road could be subject to the £70 psqm CIL charging rate for new residential development (or other rate once examined and adopted) dependent upon the timing of an application and the Inspector's main recommendations. Any CIL contribution help to deliver wider infrastructure identified as needed within the district. It

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is highly likely that achieving a 40% affordable housing level will render the scheme unviable.