## <u>Colchester Borough Local Plan 2017 – 2033</u> <u>Section 2 Examination</u>

## Main Matter 2 - Sustainable Growth Policies (Policies SG1 to SG8)

• Does CLP Section 2 Policy SG2 make adequate provision to meet Colchester's housing requirement as set out in CLP Section 1 (14720 new homes) and its timescale for delivery within the plan period 2017 - 2033?

Hopkins Homes have previously requested the amendment of the final paragraph of this policy to acknowledge the role of 'Sustainable Settlements' in delivering housing to maintain a five-year housing land supply. Whilst Hopkins Homes supports the reference to Sustainable Settlements in this Policy, we remain concerned to see that the role of such development in these settlements is confined to maintaining vitality and viability, rather than anything more. Housing delivery in higher order settlements and at the Garden Community is likely to have longer lead-in times and therefore be delivered at a slower pace. Delivery of housing in the Sustainable Settlements allows for the pace of housing provision to be maintained in line with the annualised target and assist in maintaining a five-year supply of housing. It is therefore important that Policy SG2 suitably reflects this requirement, to ensure that the Policy is properly justified, reflective of national policy and that the Plan is effective.

The requested change to this policy is repeated in **bold** below:

"To assist in maintaining a five-year supply of housing and to support the vitality and viability of the Borough's smaller towns and villages, an appropriate level of new development will be brought forward in Sustainable Settlements to support new homes and economic and social development. Details on those allocations are provided in Policies SS1-SS16 (Sustainable Settlements)"

Furthermore, the subsequent Table following Policy SG2 requires referencing to Policy SG2 and to the delivery of 'minimum numbers' in order to suitably correlate with the minimum housing numbers referred to in Policy SP3.

Hopkins Homes continues to note an absence of any justification for the housing numbers allocated to each location in either this Submission Plan document or the accompanying Sustainability Appraisal. As such, Hopkins Homes objects to the lack of justification for the figures used to derive the proposed allocations for each settlement.

In order to be made 'Sound', the title of the Table should therefore specifically reference it to Policy SG2 and should refer to minimum housing requirements. The Council must also provide evidence for the proposed settlement yields (having regard to reasonable alternatives) and in any event, these should be expressed as minimum.