

**From:** Piper, Jane jane.piper@stantec.com  
**Subject:** FW: Officer's Meadow - Response to BBC Policy & Housing Comments  
**Date:** 26 July 2024 at 11:32  
**To:**



Kind regards  
Jane

Jane Piper

Planning Director

Mobile: 07887 526404  
Tel: +44 118 952 0242  
[Jane.piper@stantec.com](mailto:jane.piper@stantec.com)



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**From:** Piper, Jane  
**Sent:** Monday, April 8, 2024 10:37 AM  
**To:** Federica Ambrosini <federica@kewplanning.co.uk>  
**Cc:** Ben Yallop <Ben.Yallop@croudace.co.uk>; emma.goodings@brentwood.rochford.gov.uk; Kathryn Williams <Kathryn@kewplanning.co.uk>; Shanshan Li <Shanshan@kewplanning.co.uk>  
**Subject:** Officer's Meadow - Response to BBC Policy & Housing Comments

Hi Federica

I write further to your email of 28 March which enclosed Policy and Housing comments.

In terms of the **Policy** comments, we would welcome clarification on how the contributions for the following items have been calculated. The figure in the 4<sup>th</sup> column in the spreadsheet extract below is our calculation based on the rationale set out in the 2<sup>nd</sup> column. The figure in the 5<sup>th</sup> column is that from the Policy team note.

IDP Item 10 Quietway Routes	£5,000,000 split between R03-R19. At 344 of 2118 dwellings (assuming Policy R03 at 825) = 0.162 = £810,000		810,000.00	1,077,6
Item T12 – Railway station cycle infrastructure	£300,000 split between R03-R22 & E08. At 344 of 2336 dwellings (assuming Policy R03 at 825) = 0.147		44,100.00	53,1

Notwithstanding this, the s106 contributions along with the affordable housing offer, are two significant elements that Croudace would like to discuss with Emma Goodings. We have yet to receive the proposed financial contributions from National Highways and ECC Highways, but already the total costs (including CIL) is c.£40,000 per dwelling, which is extremely high and far exceeds the viability assessment at the Local Plan Examination, which was also based on 825 dwellings on this allocated site, not c700 now achievable. This equates to a 15% decrease in dwelling numbers, most of which is on the Croudace site due to the increase in climate change flood modelling.

## Housing comments

The response from the Housing department is very disappointing. Croudace is sympathetic to the issues, but as our previous email of 20 March sets out in detail, Croudace was working to the SHMA 2022 figures given by the Council. The previous 2016 SHMA figures were what the Local Plan was based upon and is generally accepted by the planning industry to be the figures used to demonstrate housing need within a Borough (not just on a site at a particular point in time). Notwithstanding this and given the significant difference in the specified need, Croudace followed planning officers' advice and sought the views of local RPs as the organisations that will be delivering the affordable housing provision, which seemed a pragmatic approach. As set out in the 20 March email, the suggested housing mix complies with what the RPs require.

Notwithstanding that, in terms of the comments made by Housing, the only comments received, *"To reiterate my colleague's previous comments, the current mix of units will not be supported on the basis that the number of 1 and 2 bed properties is significantly above planning policy and housing need and contradicts the advice provided in the pre application meeting. As noted, we would only support a mix of up to 65% 1 and 2 beds in the affordable housing mix."* do not cover the quantum of 3 beds being sought, so that in itself has been difficult to consider. Also the RPs do not want any increase in the number of 4 bed houses.

Removing more 3 bed houses from the market mix is a significant concern, in addition to the large s106 contributions and CIL being sought.

As an aside, to respond to the point raised about M4(3) units, this issue was not addressed in the email of 20 March, as we were offering a solution to try and establish some common ground in order to get a local decision, and like the tenure split was a point for further discussion, once a mix is agreed.

So it seems we are at an impasse, and Croudace needs senior officers to take a view on this and other matters (not least the reduction in dwellings that can now be delivered on this site and R03 as a whole) and consider the planning balance of what is being proposed in this fundamentally policy compliant, high quality scheme. As such, Croudace requested a meeting with Emma Goodings in its letter of 3 April 2024.

Whilst we await that meeting, as you know Croudace is seeking legal opinion on various aspects of the proposals but still wishes to work towards a local decision in June.

Further, and just for your information, in addition to the proposed tenure split suggested by the Policy team (45% affordable and social rent:55% shared ownership) which has already been considered (see email of 27 March 2024) Croudace is now also considering the merits of providing the full 25% of First Homes. We recognise that the Local Plan was exempt from making provision as it was in the transition period, but the NPPF allows developers to do this under the definition of Affordable Housing in Annex 2 and Footnote 81 (the Affordable Housing Homes Update Written Ministerial Statement published on 24th May 2021).

Kind regards  
Jane

Jane Piper

Planning Director

Mobile: 07887 526404  
Tel: +44 118 952 0242  
[Jane.piper@stantec.com](mailto:Jane.piper@stantec.com)



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