

Gladman Developments Ltd

Braintree District Council - Section 2 Local Plan Examination

Main Matter 5: A Prosperous District – Homes – Policy LPP 17



June 2021

Main Matter 5 – A Prosperous District – Homes – Policy LPP 17

1.1 Does BLP Section 2 and in particular Policy LPP 17 Housing Provision and Delivery demonstrate an adequate supply to meet Braintree’s housing requirement as set out in BLP Section 1 (14,320 new homes) and its timescale for delivery within the plan period 2013 - 2033?

1.1.1 The examining Inspector for the BLP Section 1 concluded in his Post Hearing Letter (15th May 2020), that the overall housing requirement of 14,320 new homes (716 dwellings per annum) for Braintree district over the plan period 2013-2033 is soundly based. Therefore, there is no requirement for BDC to modify Policy LPP 17 of the BLP Section 2.

1.1.2 However, as currently drafted, we do not believe that the Section 2 BLP and LPP 17 (Housing Provision and Housing Delivery) will make adequate provision to meet Braintree’s overall minimum housing requirement over the plan period (2013-2033), with sufficient flexibility to adapt to any site delivery delays or other changes that may take place over the Local Plan period.

1.1.3 The examining Inspector for the BLP Section 1 concluded in his Post-Hearing letter to the North Essex Authorities (NEAs), that two of the three proposed NEAs Garden Communities at Colchester / Braintree Borders and West of Braintree were unsound in terms of their justification and deliverability and therefore, recommended their removal from the BLP Section 1. All three NEAs agreed to remove the two Garden Communities in order to progress the BLP Section 1 towards adoption (22nd February 2021) and their Section 2 Local Plans.

1.1.4 Policy LPP 17 in the Submission version of the BLP Section 2 envisaged that 2,500 dwellings would be delivered from the West of Braintree Garden Community and 1,150 dwellings were anticipated to be delivered from the New Colchester Braintree Borders Garden Community up to the end of the plan period in 2033. These two sites will no longer deliver any dwellings following their deletion from the BLP Section 1.

1.1.5 The Council’s Topic Paper 2 – Housing provides an update on all changes to the Councils’ housing land supply position since the BLP Section 2 was submitted for Examination. In this respect, it notes how a small number of sites have been removed from the Council’s land supply after reviewing current information on constraints, with the largest of these being ‘land off Station Road, Braintree’ (100), ‘land at Chapel Hill, Braintree’ (60), and ‘land east of the High Street, Halstead’ (50), thereby removing a further 210 dwellings from the Council’s

overall deliverable housing supply across the plan period. The site capacities of three of the Braintree Strategic Growth Locations sites have also been updated to reflect more recent information available. These include the following sites:

- ‘Former Towerlands Park Site, Braintree’ capacity has reduced from 600 to 575 dwellings;
- ‘Wood End Farm, Witham’ capacity has reduced from 450 to 400 dwellings; and
- ‘North West Braintree – Panfield Lane’ capacity has increased from 600 to 825 dwellings.

1.1.6 The Housing Trajectory included at Appendix 1 of the Submission Plan showed that BDC previously anticipated an overall deliverable housing supply of 15,366 dwellings over the plan period (2013-2033), which equated to a surplus of +1,046 dwellings against the Local Plan’s housing requirement. Following the removal of the Colchester / Braintree Borders and West of Braintree Garden Communities from the BLP Section 1, the deletion of some smaller sites and the amendments to capacities of the Strategic Growth Location sites listed above, the deliverable supply over the plan period has decreased significantly when viewed against this previous position.

1.1.7 However, it is noted that Topic Paper 2 – Housing provides an update on housing delivery in the district since the submission of the Plan to the Secretary of State in October 2017. As of 31st March 2021, this identifies how 4,161 new dwellings have been delivered in the district within the first 8 years of the Plan period, which results in a requirement to deliver a minimum of 10,159 additional dwellings by 2033.

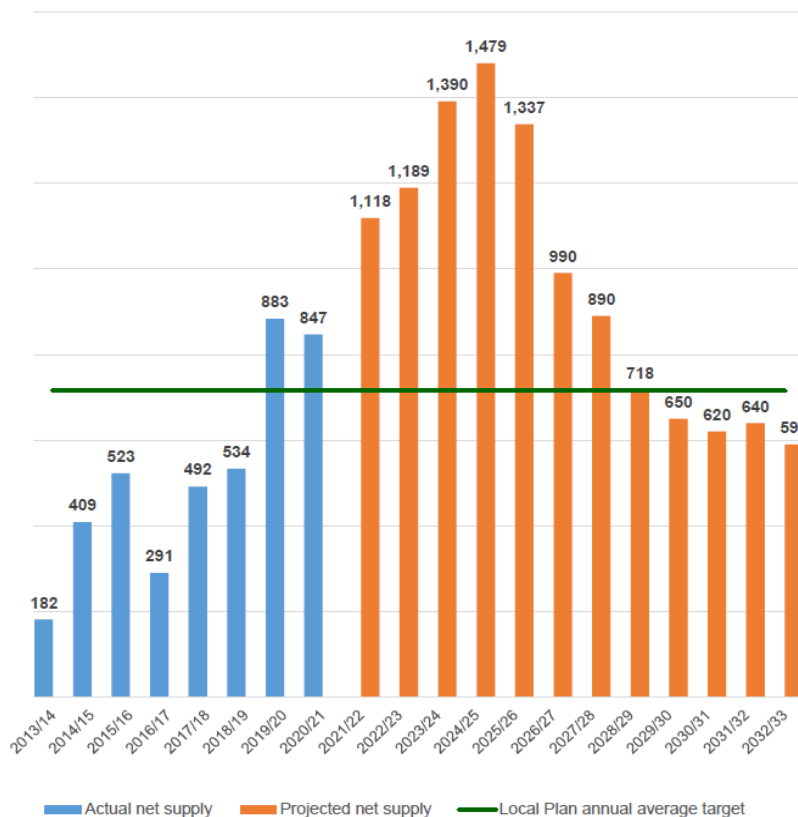
1.1.8 Table 3 in Topic Paper 2 - Housing includes a breakdown of the components of the housing deliverable supply over the 20-year plan period. This is replicated in Table 1 below.

Table 1 – Braintree DC sources of deliverable supply over the 2013-2033 plan period

Source of supply	Dwellings
Net dwellings completed 2013-2021	4,161
Plots on sites under construction	2,232
Sites with full permission and not yet under construction	1,474
Sites with outline permission, minor development (less than 10 dwellings/0.5 ha.)	56
Sites with outline planning permission, major development (10 dwellings or more or 0.5 ha. or more)	3,422
Sites without permission, with a Resolution to Grant (S106 sites)	606
Other allocated sites in the Local Plan section 2 without permission	3,251
Plus windfall allowance, 2023-2033	750
Lapse allowance 2021-2033	-180
Total projected supply 2013-2033	15,772

- 1.1.9 An updated Local Plan housing trajectory is also included at Appendix 1 of the Topic Paper to accompany these figures.

Figure 1 – Braintree Housing Trajectory 2013 – 2033



- 1.1.10 Figure 1 claims that this provides the Council with a deliverable supply of 11,611 dwellings for the remaining 12 years of the plan period (1st April 2021 – 31st March 2033), which would provide an overall housing deliverable supply of 15,772 new dwellings across the plan period (2013-2033) as whole when combined with completions to date. This would equate to a revised surplus of +1,452 dwellings (+10.14% increase) above the minimum overall housing requirement (14,320 dwellings).
- 1.1.11 However, Gladman are concerned that this may not provide an accurate picture of the housing land supply position in the district. In this respect, through our Matter 6 and 7 Hearing Statements we have questioned the lead-in times and the delivery rates of BDC's Strategic Growth Locations at 'Land east of Broad Road, Bocking' (1,000 dwellings), 'Land east of Great Notley, Strategic Growth Location (1,750 dwellings), 'Former Towerlands Park site' (575 dwellings), North West Braintree (825 dwellings), Land at Feering (795 dwellings) and Wood End Farm, Witham (400 dwellings). Whilst we do not question the merits of these proposals, our concerns have the potential to reduce the Council's supply over the plan period by 930 dwellings.

- 1.1.12 Furthermore, we note that BDC anticipate delivering 6,513 dwellings in the next five years of the plan period (1st April 2021 – 31st May 2026). This equates to an average annual housing delivery of 1,302 dwellings per annum and a 56% increase on the housing delivery across the district compared to the first eight years of the plan period (1st April 2013 – 31st March 2021).
- 1.1.13 For comparison, BDC have delivered an average of 520 dwellings per annum in the first eight years of the plan period and 609 dwellings per annum over the previous five plan years (1st April 2016 – 31st March 2021). Whilst Gladman acknowledge there are now more consented sites in the Council’s pipeline and the authority delivered 847 dwellings in 2020/21, to move from delivering an average of 609 dwellings per annum to 1,302 dwellings per annum and sustain this level of housing delivery over the coming years may be challenging.
- 1.1.14 The impact on anticipated future housing completions in Braintree district from the ongoing Covid-19 pandemic is also currently unknown and the three national lockdowns over the course of the previous 16 months, as well as the knock-on financial effects on smaller / medium sized housebuilders who have been operational across the district will significantly influence whether future housing targets will be met.
- 1.1.15 Combined, these factors have the potential to reduce the supply of housing land that can come forward over the Local Plan period and lead to a potential reduction in the 10.14% flexibility buffer that is identified in the Council’s Topic Paper 2 – Housing. Gladman would encourage BDC to review the lead-in times and delivery rates for the three Strategic Growth Locations referred to in our Matter 6 and Matter 7 Hearing Statements to provide more realistic timescales and for future housing delivery from these Strategic Growth Locations over the plan period.
- 1.1.16 Although not raised as a Question by the Inspectors within their Matters, Issues and Questions, Gladman question whether BDC are currently able to demonstrate a robust five-year housing land supply. This is primarily due to our concerns raised on the Strategic Growth Locations highlighted in our Matter 6 Hearing Statement as well as the deliverability of smaller schemes.
- 1.1.17 In light of the above, the ‘Housing Provision and Delivery’ table for the Strategic Growth Locations in Policy LPP 17 will also require main modifications to reflect the updated overall housing deliverable supply for Braintree district, as set out in Topic Paper 2 – Housing.

1.2 Does BLP Section 2 adequately address the needs for all types of housing and the needs of different groups in the community (as set out in paragraphs 50 and 159 of NPPF)?

1.2.1 At this stage, Gladman have no specific comments to make in respect of Policy LPP 33 (Affordable Housing), which requires the provision of 30% affordable housing on sites in Braintree, Witham, Halstead and Sible Hedingham. A target to deliver 40% affordable housing is set for all other locations in the district. The threshold is 15+ dwellings in Braintree, Witham and Halstead and 10+ dwellings with a maximum combined gross internal floorspace of 1,000sqm.

1.2.2 Policy LPP 34 (Affordable Housing in Rural Areas) also allows for small affordable housing sites to developed in the rural areas where an identified need is not being me through larger sites. This will provide a higher proportion of residents across the district with the opportunity to buy a new home in the town / village in which they were brought up or would like to live in.

1.2.3 Comments on Policy LPP 37 and the Council’s proposed housing mix requirements are provided in our Matter 11 Hearing Statement.

1.2.4 In relation to gypsies, travellers and travelling show-people, we note that BDC instructed ORS to undertake a study for the need of a new transit site in Essex. However, due to the ongoing Covid-19 pandemic and the national lockdowns put in place, site visits have been delayed and therefore the study has not been completed and is delayed.

1.3 Does BLP Section 2 make adequate provision through site allocations to meet the housing requirement of the Gypsies, Travellers and Travelling Showpeople in Braintree?

1.3.1 Gladman has no comments to make on this question.