

EXAMINATION OF THE BRAINTREE DISTRICT PLAN SECTION 2

FURTHER HEARING STATEMENT ON BEHALF OF GALLIARD HOMES

MATTER 5 – A PROSPEROUS DISTRICT - HOMES

- **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 (14320 new homes) and its timescale for delivery within the plan period 2013 - 2033?**

As the Council has stated in its Topic Paper 2 Housing, the removal of the proposals for two of the three Garden Communities has resulted in the need to replace the lost 3,560 dwellings with other sites to ensure there is an adequate supply of housing land to the end of the Plan Period.

It is not clear from para 2.32 of the Topic Paper how that is to be achieved. There is a reference to ‘nearly 2,300 dwellings have been added to the projected supply from permissions on major development sites’, but it appears that few new allocations have been made. As a consequence, even if you accept that 2,300 is robust, there is no certainty that land to accommodate the outstanding 1,260 dwellings has been identified. This is a significant shortfall.

In the Council’s Further Suggested Changes to the Local Plan section 2, May 2021 (doc ref SDBDC/008a), policy LPP 17 is updated to the extent that reference to the garden communities and their dwelling capacities

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is removed. The net change results in a loss of 3495 dwellings from strategic growth locations. What is required here is a companion table to set out how these dwellings have been replaced. It is extremely difficult to answer this question through reference to the full trajectory at Appendix 1 to the Topic Paper. In the absence of any new schedule of Strategic Sites, are we expected to conclude the shortfall has been made up by the identification of a series of non-strategic sites, that were not previously identified? The schedule at Appendix 1 of the Topic Paper does list several 'windfall' sites and some sites allowed on appeal, but not in such numbers as to compensate for the loss of 3495 homes.

The Council states that the supply is front loaded. Even so, that appears to help to achieve only a slim surplus for the five year housing land supply (5.34 years). The Council's Evidence Base Document from the Section 1 Plan, 'Build Out Rates in the Garden Communities' (July 2019) showed West of Braintree contributing 100 homes in its first year of construction. Under a Plan Review, garden communities could potentially contribute to the five year housing land supply, were that small surplus to disappear. It is towards the homes in the later stages of the Local Plan, where the garden communities would have made a significant contribution, and we suggest that the deleted garden communities have not been replaced by identifying new sites that would come forward in the later Plan Period.

There is a suspicion that the Council is suggesting that because there is uncertainty over how the housing requirement will be calculated when the Plan reaches its later stages, this section of the trajectory does not have to be worked out in detail at the moment. It has focused on improving its short term supply where it has traditionally struggled and looks to a Plan Review to identify sites for the longer term.

Two conclusions can be drawn here. One is that it has not proved possible to replace the garden communities with any more acceptable

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sites. One of the many significant benefits of the garden communities was that they relieved the pressure to continually extend existing settlements to the detriment of their often high quality heritage character and living environment. Another was that the garden community strategy allowed infrastructure to be properly planned in with the evolution of the settlement and not 'bolted on' or in some cases not provided at all.

The second conclusion is that it underlines just how important it is for, as the Council states, 'in practice the Review of the Plan will commence immediately on adoption'. The Council relied on those garden communities for the later years housing supply and now, for the moment, they have gone.

There is no clear statement provided by the Council of the additional sites it suggests have compensated for the loss of the garden communities. When you consider the trajectory provided as Appendix 1 to the Topic Paper, the vast majority of the sites listed appear to have been previously identified. 3,560 is a significant number to replace and it is very difficult to recognise how this has been achieved.

So, we suggest there is not robust evidence to demonstrate how the loss of the garden communities from the spatial strategy has been overcome. Neither quantitatively, nor, indeed, if new sites have been introduced how they have been assessed and if they are acceptable from all planning considerations, and deliverable. There is a risk that either there are not sufficient sites, or that those that are now proposed will lead to the very problems the garden communities were introduced to avoid.

It is worth pointing out that the garden communities as a strategy did not fail, but West of Braintree in particular was assessed as being of 'marginal' viability. If the Council is expecting to identify sites to meet

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the later stages of the Plan Period and beyond through an immediate Review, then this will allow the re-consideration of garden communities along with other sites as a solution to meeting the housing requirement however it is calculated.

— We have to conclude from the currently proposed wording of LPP 17 that this policy does not demonstrate an adequate supply of housing to meet the needs across the Local Plan Period 2013-33.

**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)?**

In the light of our comments that it is not clear how the dwelling loss resulting from the deletion of the garden communities has been made up, we believe in the circumstances this has also significantly undermined the Council's ability to provide adequately for affordable housing to the end of the Plan Period.

The Topic Paper 2 Housing refers to several sites where significant numbers of affordable homes are expected to be delivered. What would be helpful is information to demonstrate whether or not the Council has been delivering affordable housing in accordance with its policies in recent years and how that is proposed to continue to 2033. It is difficult to assess if adequate measures have been taken, and as it is not clear if sufficient housing of any sort will be provided through to the end of the Plan Period, one has to conclude that it may not be.

Another of the great benefits of garden communities is their ability to provide 'mixed tenure housing types and affordable homes for ordinary people'. This is one of their guiding principles. In the Section 2 Plan it is not clear that housing from the two garden communities has been adequately replaced, and their ability to meet a wide range of needs and create sustainable inclusive and mixed communities as expected by the NPPF in para 50 is not easy to transfer to a longer list of smaller sites.

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