



Braintree District Council

Local Plan Examination of Section 2

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

June 2021

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Policy LPP 17

- **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?:**

- 5.1 Yes. The relevant evidence is set out in Topic Paper 2 (Housing, April 2021) This demonstrates that the housing supply in the District is expected to exceed the housing requirement across the plan period. The updated trajectory (See Figure 2, Tables 2 and 3, pp8-9 and Appendix 1) shows the timescale for delivery, and demonstrates that sites are now in place and coming forward to support a front loaded supply from 2021.
- 5.2 The Council has put forward suggested amendments (Topic Paper 2, Section 6) to the figures in LPP 17 to reflect an updated April 2021 baseline position. This is because the original LPP17 figures in the Plan as submitted in 2017 have, in the years that have passed since submission, become out of date and do not reflect current expectations of housing delivery. The Council invites the Inspector and Examination participants to consider and focus on the Council’s amended figures as proposed in the main modifications to the Plan and set out in detail in Topic Paper 2 – Housing.
- 5.3 Topic Paper 2 Figure 1 (p5) illustrates the sharp increase in the Plan requirement compared to the previous adopted Plan. The District was 3.5 years through the Plan Period when the Objectively Assessed Need (OAN) on which the existing Plan target is based was first established in November 2016. At that time completion rates were low and sites were not in place to support the higher target. However, with large sites now in place and coming forward, the supply of homes has increased from 182 per annum at the start of the plan period to 883 in 2019/20 and 847 in 2020/21 (See Table 1, p4)- despite the impact of the pandemic. As a result of the improved delivery the District is now a 5% buffer authority as measured by the Housing Delivery Test.
- 5.4 Much has changed in the supply since the 2017 Submitted Plan. The two new Garden Communities have been deleted; many of the draft allocations now have permission (as shown in Appendix 5 of Topic Paper 2) and new permissions have increased the supply of a range of medium sized sites.

With economic recovery from the recession and new sites in place, delivery rates have increased in recent years.

5.5 In the 2017 trajectory, dwellings completed in the plan period, sites with permission, and sites with a Resolution to Grant totalled 5,741 dwellings. By 2021, existing commitments totalled 11,951 dwellings¹ – 83.5% of the 14,320 Local Plan dwelling supply requirement for the period 2013-2033.

5.6 Taken together with updated information from developers and site promoters (summarised in Topic Paper 2, Appendix 2), the progress provides a high level of confidence in the delivery of housing to meet Braintree’s housing requirement as set out in BLP Section 1. The updated 2021 figures summarised in Topic Paper 2 Table 3 (p9), and detailed in the trajectory in Appendix 1 of the Topic Paper, demonstrate that the housing requirement of 14,320 homes in the period 2013 to 2033 is likely to be exceeded with the total projected supply in the plan period 2013-2033 being 15,772 dwellings.

Note: By way of update to the Topic Paper, by May 2021, 596 of the supply in the “Resolution to Grant” category (Table 3 of Topic Paper 2) moved to Outline permission (Towerlands Braintree; and Hunwicks site Halstead); and Reserved Matters were approved on three large sites with Outline permission (Stonepath Drive Hatfield Peverel 140; West of Mount Hill Halstead 71 and Hedingham Road Gosfield 35).

5.7 Topic Paper 2 summarises the projected supply in the 2021 update in Table 3 (p9) and Table 5 (p9). This shows a total projected supply of 15,772, which exceeds the 14,320 target 2013-2033 by 1,452. The residual target at 1st April 2021 was 10,159; therefore the projected supply provides a buffer of 14.29% over the residual target to be achieved, which allows for the possibility that some sites may be slower in coming forward than forecast in the trajectory.

5.8 The 2021 updated information provides confidence in delivery of the target because of:

- the progress already made in allocations coming forward, with over 83% of the housing requirement now in commitments
- information supplied by developers of the proposed sites
- the additional permissions of medium sized sites since the plan was submitted

¹ See Topic Paper 2, Table 3, p 9. This consists of all completed sites, sites under constructions, sites with full permission, sites with outline permission (both minor and major development) and sites with Resolution to Grant

- 5.9 When the windfall and lapse allowances are factored in, the net supply before proposed allocations outside of commitments are taken into account is 12,521², which is 87.4% of the Plan's housing requirement. This leaves a residual of 1,799 dwellings needed from the proposed allocations to meet the housing requirement.
- 5.10 As Table 3 (p9) illustrates allocations without planning permission are projected to deliver 3,251 dwellings within the plan period. Of these, as at 31 March 2021, there were planning applications currently pending for the delivery of 480 dwellings, and pre application discussions are in progress on other sites. In addition, the two remaining Strategic Growth Locations not yet permitted or with a planning application pending are expected to submit outline applications within the next year (Notley, 1,750, Q2 2021, Feering, 895, Q2 2022).
- 5.11 The trajectory and Topic Paper 2 Table 4(p12) (supply by size of site) demonstrate that there is a good range of sites in terms of location and in terms of size. This includes a good supply of sites capable of being developed by small local builders; excluding sites with a net loss, over 2017-2033 there are 637 development sites for less than 50 dwellings.
- 5.12 In a submission in response to the 2017 Plan, the Home Builders Federation expressed concern that housing supply was too concentrated on the latter part of the Plan Period and on strategic sites including the two New Garden Communities. They suggested that additional medium sized sites should be added that could come forward earlier. In the 2021 updated trajectory, the New Garden Communities are deleted; new medium sized sites have been granted permission³; supply has increased over the past two years and in

² 11,951 + 750(windfall allowance) – 180 (lapse allowance) = 12,521

³ 5.11 Medium sized sites (50 or more dwellings) added include:

- Sudbury Road Halstead (218 dwellings, under construction)
- Rickstones Road Rivenhall/NE Witham (58 dwellings, under construction)
- Bramston site Bridge Street Witham (58 dwellings, under construction)
- Harvard Place Earls Colne (90 dwellings, under construction)
- Braintree Road Cressing (225 dwellings, under construction)
- Colchester Road Coggeshall (300 dwellings, Reserved Matters submitted)
- Church Street Bocking (265 dwellings, Reserved Matters in preparation)
- Mount Hill Halstead (71 dwellings, Reserved Matters recently approved)
- Gleneagles Way Hatfield Peverel (100 dwellings, Reserved Matters approved)
- Stonepath Drive Hatfield Peverel (140 dwellings, Reserved Matters approved)
- North of Oak Road Halstead (70 dwellings, Reserved Matters in preparation)
- Long Green Cressing (250 dwellings, Reserved Matters in preparation)
- Bardfield Road Finchingfield (50 dwellings)

terms of projected supply the updated trajectory shows sites are in place to support front loaded delivery. Sites are in place to meet the 5 year supply requirement, including making up the shortfall accrued in the early years of the Plan Period. The 2021 updated supply is tested in Topic Paper 2 against the 5 year supply target for 2021/26, and the projected target for 2022/27. Based on a 5% buffer requirement there is a 6.03 supply in the period 2021/26 (Table 6i (p15)), and a 6.41 year supply in the period 2022/27 (Table 7i (p16)).

- **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)?**

- 5.13 Yes, the Plan does address the needs for all types of housing and of different groups in the community.
- 5.14 NPPF paragraph 50 requires the plan to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community including families with children, older people, people with disabilities, and people wishing to build their own home. Paragraph 159 of the NPPF describes how, to inform the plan, the Council should carry out a Strategic Housing Market Assessment.
- 5.15 The Council jointly commissioned a Strategic Housing Market Assessment, together with the local planning authorities for Chelmsford, Colchester, Brentwood and Tendring. The Strategic Housing Market 2015 update (EB/019) provides details of the assessed housing need for different types of housing and different groups in the community. That evidence indicated that the need for market housing in the District was: 4% one bedroom, 31% two bedroom, 45% three bedroom and 20% four bedroom. In addition very local and up to date evidence on local affordable housing needs in the District and in particular areas of the District is provided by the Council's Strategic Housing Service in relation to planning applications and pre application advice.
- 5.16 The Plan sets out in Policy LPP37 a framework for achieving a suitable mix of house types. New developments are expected to meet the broad range of sizes indicated in the SHMA (EB/019) unless it can be proved the site is more suited to an alternative mix of house types (paragraph 6.114 of the Plan). The Policy allows some flexibility, in that it takes into account the character of the site and the locality, but on larger sites developments are expected to meet this range of need. This has been negotiated on Master Layout Plans on large sites, and with more recent applications through Parameter Plans.

Alongside the policies on affordable housing and the range of sites allocated in both rural and urban areas the Council considers this meets the requirement to provide a range of housing. How the Council specifically deals with affordable housing is set out within matter 11.

Families with young children

- 5.17 On large sites the Plan seeks to secure a housing mix that will include 2, 3 and 4 bedroom homes. New developments should be in accordance with national internal space standards and on site amenity space is to be provided in accordance with the adopted guidance (para 6.117 and Policy LPP37 of the Plan).

Older people:

- 5.18 The majority of older people prefer to remain in their own home as far as possible, with adaptation and support if needed. In addition to the provision for smaller properties included in the housing mix on new developments, Policy LPP37 provides for a minimum of 10% of new market homes on sites of ten or more dwellings to be wheelchair accessible, and for 90% of new affordable homes to be wheelchair accessible. Proposed Modification of the Policy (MM41) seeks to improve the clarity of the Policy and to reflect the requirements of Building Regulations.
- 5.19 The Plan provides for Specialist housing in Policy LPP 35; this subject is examined in Matter 11. The provision for specialist housing is not confined to the specific allocations in the Plan at Polly's Hill Braintree and St Dominic's Care Home Kelvedon; Policy LPP 35 states that proposals for specialist housing on sites within the development boundaries will be permitted provided that the criteria set out in Policy LPP 35 are met.

People with disabilities

- 5.20 Policy LPP37 provides for a proportion of new homes to be wheelchair accessible, as described above; specialist housing is examined in Matter 11. The plan provides for specialist housing in Policy LPP 35 under which, in addition to the allocation of the site at Blamsters Halstead, proposals for specialist housing on sites within the development boundaries will be permitted provided that the criteria set out in Policy LPP 35 are met.

Young people/first homes

- 5.21 The housing mix required in Policy LPP37 includes provision for smaller properties suitable for first time buyers, as indicated in the SHMA (EB/019). The affordable housing secured through Section 106 Agreements on permissions on larger sites takes into account information on the characteristics of local housing need in that area, as advised by the Council's

Strategic Housing officer. This secures affordable homes to rent including smaller houses and flats, and in the form of shared ownership properties.

People wishing to build their own home

- 5.22 On sites of 500 or more dwellings, 2% of homes should be made available for self-build or custom build development. This in addition to the potential for self-build/custom build developments from the supply of small sites in the District; in the 2021 update, over the period 2017-33 there were 570 sites for between 0 and 9 dwellings, of which 355 were for single dwellings (including sites for redevelopment of a dwelling). This is set out in more detail in para
- **Does BLP Section 2 make adequate provision through site allocations to meet the housing requirement of for Gypsies, Travellers and Travelling Showpeople in Braintree?**
- 5.23 Yes it is considered that the Local Plan makes adequate provision for the housing requirements of Gypsies, Travellers and Travelling Showpeople in the Braintree District, either on allocated sites and/or through a criteria based policy. .
- 5.24 The policy and evidence base is considered in more detail under Matter 11 and the Councils position is also set out within Topic Paper 2 on Housing, paragraph numbers 4.15 to 4.32 (pp24-27).
- 5.25 Despite extensive Call for Sites exercises the Council had no sites submitted for consideration as Gypsy and Traveller sites or Travelling showpersons sites, nor owners who were willing to accept such sites on their land. The Council has no such land which it would consider suitable for such as use. As such the Council policy is to locate Gypsy and Traveller sites as part of the Strategic Growth locations in the District, or to consider them on a case by case basis via a criteria based approach.
- 5.26 The Council requirements show that there is a need for 1 Gypsy and Traveller pitch for those which meet the definition between 2016 and 2026, and that need has already been met through the planning process. As such it is not considered necessary to allocate specifically any further land with the additional single plot likely to come through from the planning process or on the Strategic Growth Locations.
- 5.27 For Travelling Showpeople there is a need for 3 plots between 2016 and 2026 which have not yet been provided, although there has also been no indication from the community that this are currently in demand. Again these are proposed to be met through the co-location on Strategic Growth sites or

through the planning system on a criteria based policy. Two further plots are required in the final 5 years of the plan and it is considered that these are also likely to come forward on the Strategic Growth Locations or the planning process.

- 5.28 The Council is however aware of its requirements in relation to ensuring the provision of appropriate Gypsy and Traveller and Travelling Showpeople's accommodation in the District and as such, if it becomes necessary, will take a proactive approach to seek appropriate land and develop out a site as necessary to meet these needs. Whilst not a stock holding authority, the Council has in house expertise in the form of its Strategic Investment team who would be able to identify and manage the construction of a suitable site, subject to the criteria set out within this policy.