

Gladman Developments Ltd

Braintree District Council - Section 2 Local Plan Examination

Matter 6 Hearing Statement



June 2021

Main Matter 6 – Strategic Growth Locations 1

Policy LPP 18 Strategic Growth Location - Land East of Great Notley, south of Braintree

Policy LPP 19 Strategic Growth Location - Land East of Broad Road, Braintree

Policy LPP 20 Strategic Growth Location - Former Towerlands Park Site

Are the above policies and site allocations justified by appropriate available evidence, having regard to national guidance, and local context, including the meeting the requirements of the BLP Section 1?

1.1 Gladman do not wish to comment on this question.

Do the housing land site allocations identified above show how they will contribute to the achievement of the overall housing requirement of the BLP Section 1 (14,320 new homes) and its timescale for delivery?

1.2 Whilst having no comments on the merits of these sites or their suitability as locations for housing, Gladman question whether the lead-in and delivery timescales of these strategic allocations are realistic and whether they will deliver the levels of housing currently proposed in Policy SP3 as a result.

1.3 Gladman's concerns relating to the delivery timescales of the above housing land allocations are set out in turn below.

LPP 18 Strategic Growth Location - Land East of Great Notley

1.4 LPP18, Land East of Great Notley is allocated for 1,750 new homes alongside other uses and is anticipated to come forward in full during the Plan Period. However, we note that there are inconsistencies within the evidence libraries in relation to the lead-in and delivery timescales for this scheme.

1.5 Topic Paper 2 – Housing sets out a Housing Trajectory which was updated to a baseline of 31st March 2021. This highlights that first completions are anticipated in 2023/24, with the site fully completing by the end of the plan period.

1.6 Yet, in the same topic paper, Appendix 2 Assessment of Large Sites on page 36, states that first completions are anticipated in 2024/25. The timescales are further complicated by the supporting text on page 36, which states that the trajectory and delivery timeline provided by the site developers projects first delivery in 2023/24.

- 1.7 The evidence demonstrating deliverability highlights that the submission of an outline planning application was anticipated in Spring 2021, but as of 17th June 2021 this has not yet transpired. In line with evidence provided in the Lichfields Start to Finish Report (2020), we note that the average time from obtaining planning permission to first dwelling completion is normally 3 years¹.
- 1.8 In this regard, anticipating first completions by 2023/24 appears to be somewhat unrealistic and this could have implications for the number of dwellings will subsequently come forward within the plan period.
- 1.9 Gladman do not question the site’s overall delivery credentials, but we are concerned that the current evidence base does not provide clarity on the true lead-in and delivery timescales for this scheme, and that the evidence provided within the Housing Topic Paper brings into question whether the full 1,750 dwellings will come forward within the plan period.
- 1.10 Although we note that there have been no recent comparable developments in the district, the projected delivery rate of 195 dpa also appears somewhat optimistic. From the evidence provided in the Council’s Topic Paper, no scheme has ever achieved this level of delivery in the district. Furthermore, the Topic Paper evidence appears to indicate that 175 dpa would be more realistic from this scheme as a maximum. Gladman believe that a more realistic figure, taking account of some of the variables listed in BDC’s Topic Paper would be 150 dpa.
- 1.11 On this basis, Gladman believe that realistically only 1,125 dwellings will be delivered from this site within the plan period, resulting in a difference in deliverable supply of 625 dwellings:

Table 1 – BDC vs GDL delivery from Land east of Great Notley SGL

Year	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33
BDC	75	195	195	195	195	195	195	195	195
GDL	0	75	150	150	150	150	150	150	150

LPP 19 Strategic Growth Location - Land East of Broad Road, Braintree

- 1.12 This site is allocated for 1,000 dwellings to be delivered within the plan period and benefits from outline planning permission granted in March 2021.

¹ Lichfields: Start to Finish (Second Edition) – What factors affect the build-out rates of large-scale housing sites? <https://lichfields.uk/content/insights/start-to-finish>

- 1.19 Again, Gladman do not question the overall development credentials of this scheme, however we believe that the delivery timescales currently proposed for the site are overly optimistic and not justified by the supporting evidence. This could result in a shortfall in the planned delivery timescales for the site during the plan period.

LPP 20 Strategic Growth Location - Former Towerlands Park Site

- 1.20 Former Tower Lands is allocated for 575 dwellings, with the first dwellings anticipated to complete in the 2023/24 monitoring period.
- 1.21 The site is discussed to highlight inconsistencies within the evidence base and proposed delivery timescales of the strategic site allocations. Despite achieving outline planning permission only 9 days after LPP 19, not yet being subject to a reserved matters application or in the control of a developer/housebuilder, first completions are projected for a year later than LPP 19. As no supporting justification or evidence appears to have been obtained from the site developers, it is not clear how such different delivery timescales have been derived.

Summary

- 1.22 High level analysis into the delivery timescales for policies LPP 18 and 19 indicates that approximately 930 dwellings are unlikely to be delivered within the plan period (2013-2033) from these schemes due to over-optimistic delivery rates and potential delays in relation to the lead-in times of these sites.
- 1.23 While Gladman do not contend the overall deliverability of the sites, it does not appear that the delivery timescales are fully justified by the current evidence base.
- 1.24 On this basis, we contend that there may be a requirement to identify additional housing sites through the BLP Section 2, to ensure sufficient housing comes forward within the Local Plan period and to provide sufficient contingency and flexibility (above the current level of 5%) in the Council's housing land supply, and to ensure Braintree's full housing needs can be met.

Do policies LPP 18 to LPP 20 provide clear direction as to how a decision maker should react to a development proposal in relation to these allocations?

- 1.25 Gladman do not wish to comment on this question.