

Gladman Developments

Braintree District Council - Section 2 Local Plan Examination

Matter 7 Hearing Statement



June 2021

Main Matter 7 – Strategic Growth Locations 2

Policy LPP 21 Strategic Growth Location - North West Braintree

Policy LPP 22 Strategic Growth Location - Land at Feering

Policy LPP 23 Strategic Growth Location - Wood End Farm, Witham

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 21 Strategic Growth Location – North West Braintree (Panfield Lane)

1.4 Policy LPP 21 was originally allocated for 600 dwellings in the Pre-Submission version of the BLP Section 2. This is now proposed to be revised to 825 dwellings through the Council's Local Plan Further Suggested Changes (MM28) to reflect the hybrid planning consent that is in place for the site (15/01319). This has full permission for 189 homes under Phase I and outline planning permission for a further 636 homes under Phase II.

1.5 Topic 2 – Housing describes the proposed lead-in times and delivery timescales for this scheme. In this respect, this explains how BDC has sought to take a conservative approach when estimating rates of delivery of this scheme, reducing the number of units that are anticipated to come forward in year 1 (2023/24) for Phase I and in first year (2026/27) and final year (2032/33) for Phase II.

1.6 We note that the delivery timescales for this site appear to have been revised when compared to previous projected lead-in times, including those that were considered in an Appeal

decision for Land off School Lane, Rayne¹. Although considering the site in the context of the BDC's five-year housing land supply position, the decision also noted how Phase II is dependent on the main development (Phase I) enabling infrastructure works taking place in advance.

- 1.7 The Council's current trajectory estimates that 25 completions will be delivered on Phase I in 2023/24, followed by 75 in the next two years and 14 in 2026/27. Phase II is projected to deliver 26 units in 2026/27, followed by 105 units over the next five years, with the remaining 85 delivered in 2032/33.
- 1.8 Although Gladman have no reason to dispute the delivery rates for Phase I at the current time, it is unclear why Phase I is projected to deliver a maximum of 75 units, and why Phase II will deliver a maximum of 105, though we acknowledge the difference for Phase I could be influenced by the developers' programme. Furthermore, we also note that there is a significant jump in completions for Phase II after year 1 and query whether a build rate of 105 units is achievable. As stated in our Matter 6 statement, in our experience, a rate of 75 units may be more achievable for 2 outlets operating on site.
- 1.9 Notwithstanding the above, Gladman consider that further clarification is required in relation to the delivery of the 636 dwellings.
- 1.10 Within the Topic Paper 2 - Housing, the site summary table for Site Reference: 2021 TR076B refers to simply 'Phase 2' which has a site capacity of 636 dwellings to be delivered by Mersea Homes and Hill Residential Ltd. However, the accompanying trajectories, namely in Topic Paper 2 Housing – Appendix 1 refers to phases 2, 3 and 4 delivering the remaining dwellings (see row 694). Gladman propose further clarification is needed in relation to this wording, particularly in relation to whether these phases relate to the number of outlets on site at any one time.

LPP 22 Strategic Growth Location - Land at Feering

- 1.11 Policy LPP 22 is proposed to be allocated for up to 750 dwellings in the BLP Section 2. The main growth location site is stated to have a capacity of 755 dwellings, with a further Phase I scheme having already come forward and under construction, and a further parcel for 40 dwellings expected to be delivered separately in 2025/26.

¹ Land off School Lane, Rayne – APP/Z1510/W/20/3247020

- 1.12 Topic Paper 2 – Housing describes how the site promoter currently anticipates the submission of an outline planning application for the 755 dwellings scheme in Q2 2022/23 with reserved matters following in Q2 2024/25. The site is then anticipated to start delivering housing in 2025/26 at a rate of 60 dpa in the first year, with 100 dpa thereafter.
- 1.13 At this stage, the delivery timescales for this scheme would seem achievable based on the current planning status of the site and the projected timescales for achieving the necessary planning consents, although we would note that the Lichfield’s Start to Finish² report indicates that the lead-in time (planning period and planning to delivery period) for schemes this size is 4 years on average.
- 1.14 However, should there be reason to doubt these timescales, or any supporting infrastructure requirements or technical constraints that are not discussed in BDC’s Topic Paper, this could impact the site’s delivery projections. Again, as highlighted in our Matter 6 Statement, in our experience a rate of 75 units may be more achievable for 2 outlets.

LPP 23 – Strategic Growth Location - Wood End Farm, Witham

- 1.15 Policy LPP 23 was previously allocated for 450 dwellings in the Pre-Submission version of the BLP Section 2. This is now proposed to be revised to 400 dwellings through the Council’s Local Plan Further Suggested Changes (MM30), reflecting the outline planning application that is currently pending consideration for the site (19/01896/OUT).
- 1.16 Correspondence from the site developer suggests that first completions will begin a year after. On this basis 90 dwellings are projected to be delivered in 2024/25, with 104 dwellings completed over the next two years, 69 dwellings in 2027/28 and 33 dwellings in 2028/29.
- 1.17 Reviewing the information contained within the Council’s Topic Paper and the same Lichfields lead-in time information discussed in relation to Policy LPP 22 above, these timescales would appear to be achievable based on the current planning status of the site. However, should there be reason to doubt these timescales, or any supporting infrastructure requirements or technical constraints that are not discussed in BDC’s Topic Paper, this could impact the site’s delivery projections.

² Lichfields Start to Finish Report Second Edition, Figure 4, p6 – available at https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf

- 1.18 We note that the site is projected to deliver 90 units in the first year of completions. Although this may be influenced by the C2 element of the scheme, we maintain that this would appear to be high for a single developer.

Summary

- 1.19 As stated in our Matter 6 Hearing Statement, whilst Gladman have no objection to the suitability of these sites as locations for growth or their ability to come forward, in some instances the lead-in times and delivery rates for these schemes may be overly optimistic.
- 1.20 Any uncertainty over lead-in times, delivery timescales or delivery rates for BDC's Strategic Growth Locations may lead to 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?

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