

Gladman Developments Ltd

Braintree District Council - Section 2 Local Plan Examination

**Main Matter 11: A Prosperous District – Homes – Policies LPP33 –
LPP43**



June 2021

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1.1 LPP37 – Housing Type and Density

Are the above policies justified by appropriate available evidence, having regard to national guidance and local context?

Do the policies provide clear direction as to how a decision maker should react to a development proposal?

Are the Council's proposed modifications to the policies necessary for soundness?

1.1.1 These submissions are made in relation to Local Plan Policy LPP37, which identifies how the mix of housing put forward in development proposals should adhere to the local needs identified in the Council's 2015 SHMA update (or successors), unless material considerations indicate otherwise.

1.1.2 In this respect, whilst we welcome the acknowledgement that housing needs should be based on the most up-to-date available SHMA evidence, we believe that the policy should make clear that this is only a starting point and that there will be other factors which will affect the most appropriate mix in practice.

1.1.3 Documents such as SHMAs provide a snapshot of housing needs at a particular point in time, and it is often the case that housing needs can be more appropriately met by assessing schemes on a case-by-case basis, in accordance with the prevailing needs and demands that are applicable to the present situation. The location and characteristics of sites differ, and in practice, developers will bring forward planning applications and proposals which match the location and demands of the market.

1.1.4 Although the policy would allow proposals to deviate from the SHMA's evidence where 'material considerations' provide grounds to do so, we believe that greater flexibility should be built into the policy's wording, taking account of the above factors.

1.1.5 Policy LPP37 also seeks to introduce specific housing standards in respect of categories 2 and 3 of Part M of the Building Regulations, and a requirement for 2% of homes to be made available for self or custom builders on sites of 500 dwellings or more.

1.1.6 Whilst we have no objection to the introduction of specific technical standards in principle, the Council should ensure that these requirements are properly evidenced in accordance with the PPG (ID: 56-020). Similarly to our comments on housing mix above, whilst we

acknowledge the support that is provided for self-build and custom build developers, we believe that Policy LPP37 would benefit from being more responsive to site-specific circumstances, to ensure there is a demonstrable demand for these products when bringing proposals forward and this does not delay the delivery of housing.