

EXAMINATION OF THE BRAINTREE DISTRICT PLAN SECTION 2

FURTHER HEARING STATEMENT ON BEHALF OF GALLIARD HOMES

MATTER 2 - SPATIAL STRATEGY

In light of removal of the 2 garden communities from Section 1 of the BLP is Braintree's spatial strategy supported by robust and up to date evidence and otherwise soundly based?

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.

The Council states that the supply is front loaded. While that may help to achieve a slim surplus for the five year housing land supply, the homes in the later stages of the Local Plan, where the garden communities would have made a significant contribution, have not been

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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 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 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.