North Essex Authorities Joint Strategic (Section 1) Plan
Examination Hearing Statement on Matter 7
For Ptarmigan Land Ltd
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Indigo
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Contents

Page

1. Introduction 1

2. Response to Inspector’s Questions on Matter 7 2
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1. **Introduction**

1.1. This Hearing Statement is submitted on behalf of Ptarmigan Land Ltd in response to the Inspector’s Matters, Issues and Questions (Document Ref: IED003).

1.2. This Statement sets out Ptarmigan’s response to Matter 7 with specific reference to the Inspector’s questions. Further Statements have been submitted for Matters 1, 3, 5 and 6.
2. Response to Inspector’s Questions on Matter 7

Question 1: Taking account of the Sustainability Appraisal and other relevant evidence, is the spatial strategy in policy SP2 justified as the most appropriate development strategy for North Essex, when considered against the reasonable alternatives?

2.1. The spatial strategy for North Essex set out in Policy SP 2 identifies that existing settlements will be the principal focus for additional growth across North Essex within the Local Plan period. It states that future growth will be planned to ensure settlements maintain their distinctive character and role. The policy also identifies that the re-use of previously-developed land within settlements is an important objective, although this will be assessed within the broader context of sustainable development principles, particularly to ensure that development locations are accessible by a choice of means of travel.

2.2. The policy requires each local authority to identify a hierarchy of settlements where new development will be accommodated according to the role of the settlement, sustainability, its physical capacity and local needs.

2.3. Finally, the policy identifies that three new Garden Communities will be developed and delivered as part of the sustainable strategy for growth. These new communities will, so it is said, provide strategic locations for at least 7,500 additional homes within the Plan period in North Essex.

2.4. We consider the spatial strategy as outlined in Policy SP2 to be acceptable in principle aside from the reliance on 7,500 homes being delivered within the Plan period from these locations.

2.5. With specific reference to the new Garden Communities, the Local Plan seeks to deliver sustainable development and to reduce car usage. However, the highway network is stressed in the peak hours, there is limited capacity to accommodate growth on sections of the GEML, and the Braintree Loop rail service is not attractive to commuters due to single line working and infrequent services.

2.6. To overcome these challenges the Local Plan proposes, in connection with the Garden Communities, new forms of ‘…high quality rapid transit networks…’ to connect the sites to existing urban centres and key destinations and interchanges. As the Local Plan eloquently says, the challenge will be to provide transport options ‘…in which people move around in a different way…’.

2.7. The fundamental importance of this step change in sustainable travel is recognised in Paragraph 6.25 of Part 1 of the Local Plan which acknowledges that ‘…this infrastructure will need to be funded and provided early in the development phase…’

2.8. The difficulty for delivery comes however, as it is highly unlikely that each site will deliver the estimated 2,500 homes within the Plan period. From practical experience, it is difficult to comprehend how these scales of development will be able to fund and deliver transport measures so early in the process that will deliver such a ‘step change’ in transport habits.

2.9. This weakness is explicitly recognised in paragraph 175 of the Jacob’s Preferred Option Report which states that:

‘…in the existing situation, their potential would be very low. With regard to the Garden Settlements, careful consideration will need to be given as to how sustainable transport development can be encouraged in the early
2.10. The Jacob’s Report concludes that significant ‘soft modes’ interventions will be required to reduce car usage.

2.11. In recognition of the above challenges, it is instructive to recognise that both the West of Braintree and Colchester/Braintree Borders garden communities were classed as ‘Key Service Villages’ in the settlement hierarchy.

2.12. It is therefore reasonable to conclude that the new Garden Communities, will at first be unsustainable in comparison to existing settlements which currently have a higher status in the settlement hierarchy, but should become more sustainable once the critical mass, other supporting uses and associated infrastructure packages are provided beyond the proposed Plan period (ie beyond 2033).

2.13. It is therefore concerning that such a significant quantum of homes is being directed to (currently) unsustainable locations with real questions over their viability and deliverability when other alternatives exist. Most notably those adjacent to existing settlements in the North Essex area. These locations already benefit from public transport infrastructure and other services and can be delivered relatively easily and quickly in comparison to the new Garden Communities.

2.14. Although the proposed new Garden Communities should form part of a robust spatial strategy in North Essex, this should not be at the expense of more sustainable options that are located adjacent to existing settlements. The proportion of new homes to be directed to the new Garden Communities within the Plan period should be reduced and other sites identified in and adjacent to the main towns across the North Essex area.

Question 3: Does policy SP2 adequately and appropriately define the role of each tier in the settlement hierarchy?

2.15. Policy SP2 does not adequately and appropriately define the role of each tier in the settlement hierarchy.

2.16. The current wording of the policy does not make it clear where in the settlement hierarchy the new Garden Communities will fall. As noted above, Section 2 of Braintree’s Local Plan identifies that the two Garden Communities within its area (Colchester / Braintree Borders and West Braintree) will be classed as ‘Key Service Villages’ to reflect their status in the Plan Period in terms of their role and sustainability credentials.

2.17. Policy SP2 should include a full breakdown of the settlements in the settlement hierarchy drawing upon the settlement hierarchies that are contained in each authority’s Local Plan Section 2.

2.18. The policy states that development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. This appears to be linked to the content provided in paragraphs 3.3 – 3.5 of the Plan.

2.19. As it stands, the policy appears to be prohibitive of development in certain towns and villages on the basis that they are considered to (currently) be less sustainable locations. However, the policy does not take into account the ability of those locations to become more sustainable if improvements are made to key infrastructure and services. This is the approach that has been taken with the new Garden Communities so it seems unreasonable that existing settlements are not given the same benefit.

2.20. The policy should not prevent sustainable development from coming forward in the existing towns and villages, particularly when there is uncertainty over whether the Garden Communities will deliver the housing numbers required in the Plan period. Paragraphs 3.3 –
3.5 of the Plan should be deleted and the following should be included as a final paragraph in Policy SP2:

‘In the event that housing delivery from the new Garden Communities is delayed resulting in a shortfall in housing delivery, sustainable development in and adjoining the Main Towns and other sustainable settlements within the North Essex area will be supported to ensure that a deliverable supply of housing is maintained throughout the Plan period.’

Question 4: Is the detail in paragraphs 3.3 to 3.5 relevant to Section 1 of the Plan? If it is, should it be included in policy SP2?

2.21. The strategic allocations for each local authority in North Essex will be considered as part of the examination process for Section 2. Unless the role of Local Plan Section 1 is to allocate strategic sites beyond the new Garden Communities, which it has not done to date, then it is premature to include reference to strategic allocations in other settlements of the district within this section of the Local Plan.

2.22. Further, there is no evidence provided within the Plan to substantiate why some higher order settlements are considered by the authorities to be less sustainable than those at the lower end of the settlement hierarchy. Without this evidence and justification in the Plan, it is unreasonable and unjustified to rule out further development in towns such as Halstead which is defined as a Main Town in Braintree’s hierarchy.

2.23. Paragraphs 3.3 – 3.5 in Section 1 should be deleted as this is a matter for the examination of Section 2 of the Local Plan.