



Andrea Copsey
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Our ref:62261650

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PUBLIC

Dear Ms Copsey,

BRAINTREE LOCAL PLAN – SECTION 2 EXAMINATION MAIN MATTERS, ISSUES AND QUESTIONS – MAIN MATTER 2 – THE SPATIAL STRATEGY

1. Introduction

- 1.1. This response to the Braintree District Council's (BDC's) Local Plan Part 2 Examination, has been prepared on behalf of Ptarmigan Land Ltd. The Hearing Statement specifically addresses Main Matter 2 of the Inspectors' Matters, Issues and Questions (MIQs) which relates to the Spatial Strategy of the plan.
- 1.2. Ptarmigan Land Ltd are the promoters of the Land South of Halstead, a Sustainable Urban Extension that was omitted from the Section 1 and Section 2 plans but has the potential to deliver a number of strategic aspirations for the Town through the delivery of physical and social infrastructure. This Statement contests that the Spatial Strategy of the Section 2 Plan is flawed following the removal of the two garden communities from the Section 1 Braintree Local Plan (BLP).

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?

- 2.1. Following the extension Section 1 examination, BDC has presented amendments to the Section 2 Plan to account for the deletion of the two Garden Communities in the Section 1 Plan within the Topic Paper 1 – Consequential Changes.
- 2.2. Whilst specifically an issue for Matter 1, we question the appropriateness of these significant changes to the Section 2 Plan being undertaken outside of a Regulation 19 consultation, although we do appreciate the need to progress the Section 2 Plan. However, this means that the evidence base underpinning the Section 2 Plan, which has not been updated, is effectively now out of date. A full audit of the evidence base should have been undertaken and made publicly available to review the evidence base behind the plan and identify where evidence would need to be updated and if not the rationale for why.

The Spatial Strategy

- 2.3. The Spatial Strategy within the Section 2 Plan identifies that growth is to be located on the towns of Braintree, Witham and Halstead. However, as seen below in the housing trajectory for the Plan, this strategy is largely redundant given the housing requirements of the plan have been delivered through the planning system outside of the plan-making process.
- 2.4. Despite this, the Section 2 does not allocate any strategic growth to Halstead, therefore, it fails to provide the town with the necessary plan-led growth to deliver the infrastructure it requires. This is particularly pertinent in Halstead where there is an identified need for a new bypass as safeguarded in the Section 2 Plan.

Housing Supply and delivery

- 2.5. The Section 1 joint local plan sets the housing target for BDC for the plan-period 2013 – 2033 at a total of 14,320 net additional homes which amounts to 716 dwellings per annum (dpa)
- 2.6. Following the Examination of the Section 1 Plan, the two Garden Communities that were proposed to be delivered within Braintree District were omitted resulting in a loss of 5,608 homes from the projected supply in the Plan period.
- 2.7. The Examination of the Section 1 Plan was pro-longed and the intervening years a number of housing developments have come forward in the District. The April 2021 Housing Topic Paper 2 identifies that between 2013/14 and 2020/21 4,161 homes have been completed. This falls short of the Local Plan target of 716 dpa resulting in a cumulative shortfall of 1,567 additional dwellings that will need to be delivered in the remaining years of the plan, on top of the annual 716 dpa target. This leaves a residual plan requirement of 10,159 at 846 dpa.
- 2.8. The Paper goes on to identify a significant increase in housing supply for the latter years of the plan, most notably the next five monitoring periods during which between 1,118 and 1,479 homes are projected to be completed per annum (net). It is envisaged that this supply will result in a surplus against the local plan target by 2024/25, and an overall surplus against the target of 1,452 homes in total by 2033.
- 2.9. The majority of this supply comes from existing commitments, sites that are either under construction, have full planning permission (or a resolution subject to S106), or have outline planning permission. Many of the allocations within the Section 2 Plan are already included within this permitted supply. Accordingly, in terms of site allocations, the Section 2 Plan has already largely been delivered outside of the Examination process.
- 2.10. This has, unfortunately, resulted in a number of un-planned developments that have been permitted on the edges of Towns like Halstead without a strategic steer as to how the various developments can sustainably support urban growth. This has been seen in Halstead where over 700 homes are scheduled to be delivered without providing the town directly with additional education, health or transport infrastructure.
- 2.11. A strategic allocation at South Halstead has the potential to deliver additional housing for the Town along with the southern section of the Halstead bypass identified for safeguarding under Policy LPP48 (please refer to our Matter 12 Statement). The strategic development

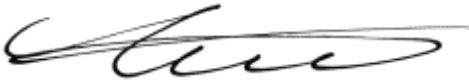
has the capability of delivering a new Primary School to meet a forecasted shortfall in supply by 2025. It could also provide a new doctors surgery to help meet the significant undersupply of GP provision within the town which is forecasted to require four additional GPs to meet the Department for Health recommended GP:Patient ratio of 1:1,800 by 2025.

3. Development boundaries

Are the development boundaries in BLP Section 2 supported by robust and up to date evidence, otherwise soundly based and appropriately drawn?

- 3.1. As noted in our Matter 12 Statement, we question the safeguarding of the Halstead bypass within the proposals map without the identified ability or mechanism to deliver this important strategic infrastructure. Essex County Council has made it clear that there is currently no public funding to deliver the bypass which has been as aspiration for the highway authority since the 1990s. As demonstrated to the Council within the Section 1 Plan consultation, the land South of Halstead has the ability to deliver the southern section of this bypass. that would provide material beneficial impacts for Halstead town centre, removing vehicles from the A131 through the town.
- 3.2. The proposals map should be amended accordingly to safeguard this land for development to support the delivery of the safeguarded bypass.

Yours sincerely,



Michael Wood
Associate Director