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Braintree District Section 2 Local Plan Examination

Hearing Statement

on behalf of

The Granville Group

Main Matter 2

July 2021

MAIN MATTER 2: The Spatial Strategy

- **In light of the removal of the two garden communities from Section 1 of the Braintree Local Plan, is Braintree’s spatial strategy supported by robust and up to date evidence and otherwise soundly based?**

Introduction

1. It is submitted that the Spatial Strategy for the Braintree District is unsound because it will not deliver the most sustainable pattern of future development. This fundamental failing arises from the following deficiencies:-

- **The Settlement Hierarchy does not sufficiently distinguish between the relative sustainability of the different settlements and their accessibility to higher tier and local community services, to major employment, to public transport and to the main lines of communication.**
- **The Spatial Strategy in the Submission Plan and after modifications to delete the Garden Communities is derived from an inadequate range of alternative spatial strategies.**

THE SETTLEMENT HIERARCHY DOES NOT SUFFICIENTLY DISTINGUISH BETWEEN THE RELATIVE SUSTAINABILTY OF THE DIFFERENT SETTLEMENTS AND THEIR ACCESSIBILITY TO HIGHER TIER AND LOCAL COMMUNITY SERVICES.

2. “Sustainability” is one of the Key Objectives of the Plan, it being stated:

“To ensure that the development takes place in the most well-connected areas, making the best use of sites that have been previously developed.”

3. The Spatial Strategy then states in paragraph 5.1:-

“The settlement hierarchy ranks areas of the District in order of their sustainability merits and size, function and services that each of the areas has to offer”.

4. Leaving aside that the stated approach refers to ranking “areas” rather than “settlements” and that it represents a contemporary snapshot rather than an assessment of future potential whereby growth might enhance the sustainability credentials of individual settlements, this leads through to paragraph 5.13 which states:-

“That the broad spatial strategy for Braintree should concentrate development on the town of Braintree, planned new garden communities, Witham and the A12/Great Eastern Mainline corridor and Halstead.”

5. With the subsequent removal of the garden communities, this reduces the specified locations for growth to Braintree, Witham, the A12 and main rail corridor, and Halstead. There is no reference to the A120 corridor – either on its existing or proposed alignments - having any particular future role to play. Nor is there any reference to focusing non-urban growth in close proximity to the Towns where the bulk of what are called “higher tier” community facilities and major employment areas are situated. Directing growth towards existing and proposed employment hubs is crucial if travel is to be reduced as Braintree is currently one of the least sustainable Districts in England with more of its employed population working outside its borders than within.
6. That, therefore, is the context against which one must assess the role and effectiveness of the Spatial Strategy and specifically the Plan’s Settlement Hierarchy.
7. The Plan’s Settlement Hierarchy, as modified, classifies settlements under the headings of Towns, Key Service Villages, Second Tier, Third Tier and Countryside. In formulating a hierarchy, and having regard to the aim to minimize the need for travel, it is vital to establish at the outset the degree of weight to be afforded the following factors:-
 - The level of existing local facilities – especially access to **local** shopping facilities, education and public transport.

- The level of accessibility by public and private transport to **higher tier** services – especially to major employment hubs and to health, secondary education and major shopping facilities; and
 - The relative potential for **improving sustainability** through the delivery of growth in order to secure improved opportunities for employment, community facilities and public transport.
8. With regard to access to higher tier services and major employment, the Settlement Hierarchy places Braintree, Witham and Halstead into the same category – namely “**Towns**” – notwithstanding their difference in size ie: 50,000, 25,000 and 12,000 respectively. In seeking to direct growth so that it is accessible to higher tier services and major employment, there is a wide gulf between Braintree on the one hand and Halstead - only a quarter its size - on the other. On that score alone, the Settlement Hierarchy has its limitations – and as advocated later, there is a strong case to separately classify the three Towns as Large, Medium and Small to reflect their differing sizes and functions.
9. The Plan’s Settlement Hierarchy is far too rudimentary and does not provide a clear and robust platform for the scale and distribution of future growth. Whilst, for example, the categorisation of Sible Hedingham and Earls Colne as Key Service Villages can be justified based on their size and range of existing facilities, they have generally poor accessibility to the main transport corridors and are relatively isolated from the higher tier services and major employment found in further afield Braintree. By way of contrast, Second Tier Villages such as Rayne and High Garrett have more limited community facilities but are geographically closer to the higher tier services in Braintree and to the main road and rail routes. In similar vein, Third Tier villages such as Cressing and Rivenhall are also geographically closer to higher tier facilities in Braintree and Witham respectively – with high potential for improving public transport links, and with good accessibility to the main road and rail corridors. Crucially, the Plan’s Spatial Strategy does not adequately reflect accessibility to higher tier facilities and employment, to the main transport corridors or to public transport – fundamental in determining the most sustainable pattern of distribution for future growth and for securing modal transfer from private to public transport.

10. It is possible to eradicate or at least reduce many of the deficiencies of the Settlement Hierarchy if greater weight is attached, as it should be, to accessibility to higher tier services, to major employment, and to the main lines of transportation and public transport. In previous representations during the Section 1 and Section 2 consultation stages of the Local Plan as well as in relation to the Tendring and Colchester Examinations, an Alternative Growth Strategy for North Essex was submitted whereby settlements were principally classified according to their accessibility to higher tier services including major employment and the main transportation corridors, but also factoring in size and access to local services. The various categories as subsequently amended are now as follows:

- **Category 1 : Large Towns**
- **Category 2 : Medium-sized Towns**
- **Category 3 : Small Towns**
- **Category 4 : Garden Villages**
- **Category 5A : Key Satellite Villages**
- **Category 5B : Primary Transport Corridor Villages**
- **Category 6 : Large Villages**
- **Category 7 : Smaller Villages & Hamlets**

11. Apart from Category 7, the location and distribution of settlements according to their category are shown in a Key Diagram for North Essex forming Annex EGA1 herewith. Extricating the settlements within Braintree District from the Key Diagram, the resultant Settlement Hierarchy is as shown in Annex EGA2 herewith. To register a few brief comments:-

12. Firstly, as noted, the Smaller Villages & Hamlets are not shown in the Key Diagram nor are they listed in the Settlement Hierarchy – but if thought useful, the latter could be listed to roughly accord with the list of Third Tier Villages in the Local Plan’s Settlement Hierarchy.

13. Secondly, with regard to the inclusion of the Garden Villages category in the Alternative Growth Strategy - and as addressed shortly, smaller scale Garden Communities have not

been actively considered as an option by Braintree during any stage of the Plan-making process.

14. Thirdly, a recent refinement is the coupling of Key Satellite Villages and Primary Transport Villages as of equal status in Category 5A and 5B respectively.
15. Finally, the Alternative Settlement Hierarchy can be further adapted and refined with a view to delivering an even more sustainable spatial strategy. For example, the branch line railway between Witham and Braintree could be defined on the Key Diagram as a Primary Transport Corridor as it effectively links the A12 and A120 Primary Transport Corridors. This would enable White Notley to be transferred from the Smaller Villages & Hamlets category to a Primary Transport Corridor Village - it being the only Smaller Village & Hamlet with a railway station.
16. The main point, however, is that the Alternative Growth Strategy reflects a much closer affinity with the need to direct growth towards higher tier services and major employment, to locations where public transport can be improved, and to the main rail and road corridors than is currently reflected in the Local Plan, whose spatial strategy now devoid of Garden Communities is far too simplistic. The Plan's Settlement Hierarchy is therefore not fit for purpose if the Key Objective of delivering sustainable development is to be achieved.
17. To summarise, given the pre-eminence of Braintree as the District's main focus for higher tier services and employment, greater emphasis should be given to its surrounding satellite villages which can be linked to more frequent and better short haul public transport, whilst settlements within the main A12, A120 and mainline rail corridors should also be afforded high status and identified as having growth potential. The approach adopted in the Alternative Growth Strategy is therefore markedly different from that in the Local Plan and would be far more likely to achieve the Key Objective of delivering sustainable development.

THE SPATIAL STRATEGY IN THE SUBMISSION PLAN AND ITS MODIFICATIONS TO DELETE THE GARDEN COMMUNITIES IS DERIVED FROM AN INADEQUATE RANGE OF ALTERNATIVE SPATIAL STRATEGIES

18. The absence of any consideration being afforded a strategy including Key Satellite Villages around Braintree to maximise accessibility to higher tier services has already been noted. There has also been pre-determination that the ill-fated garden communities would be large scale – essentially small New Towns albeit that they were classified as Key Service Villages in the Settlement Hierarchy before being deleted. As alleged above, throughout the plan-making process - no serious consideration has been afforded the inclusion of smaller Garden Communities in the form of Garden Villages as an option for inclusion in the Spatial Strategy. Two such independent schemes – Langham Garden Village in Colchester Borough and Tendring Central in Tendring District were evaluated by LUC – but none in Braintree District.

19. The pre-occupation with large scale Garden Communities and the absence of any Garden Villages being formally considered for inclusion in the emerging Spatial Strategy is difficult to comprehend as Garden Villages of up to 5,000 dwellings, (a scale the Section 1 Inspector acknowledged would support a secondary school), offered the opportunity to promote more manageable and viable schemes - capable of delivering sustainable development with lower infrastructure costs and lesser environmental impacts - thereby addressing the key deficiencies which ultimately contributed to the downfall of the large scale Garden Communities.

20. The opportunity to promote a Garden Village in Braintree District was identified in our Alternative Growth Strategy and a site at Gosfield Airfield just north of Gosfield is shown on the Key Diagram and Alternative Growth Strategy in Annex EGA1 and 2. Gosfield Airfield is a wartime airfield site with extensive areas of residual brownfield land in the form of the runways, taxiways and hardstandings, is an already established employment hub with an existing workforce exceeding 200 forming the largest employment site in the northern half of the District, is served off an ‘A’ Class road, with existing tracts of maturing structural landscaping to integrate the site into the rural landscape. It offered the opportunity to utilise brownfield land with only limited landscape impact whilst providing increased employment for nearby Halstead which is environmentally constrained. The absence of any clear evaluation of the benefits of this or other smaller scale Garden Communities as an alternative to those on the scale promoted therefore represents a serious omission in the identification of reasonable alternative spatial strategies.

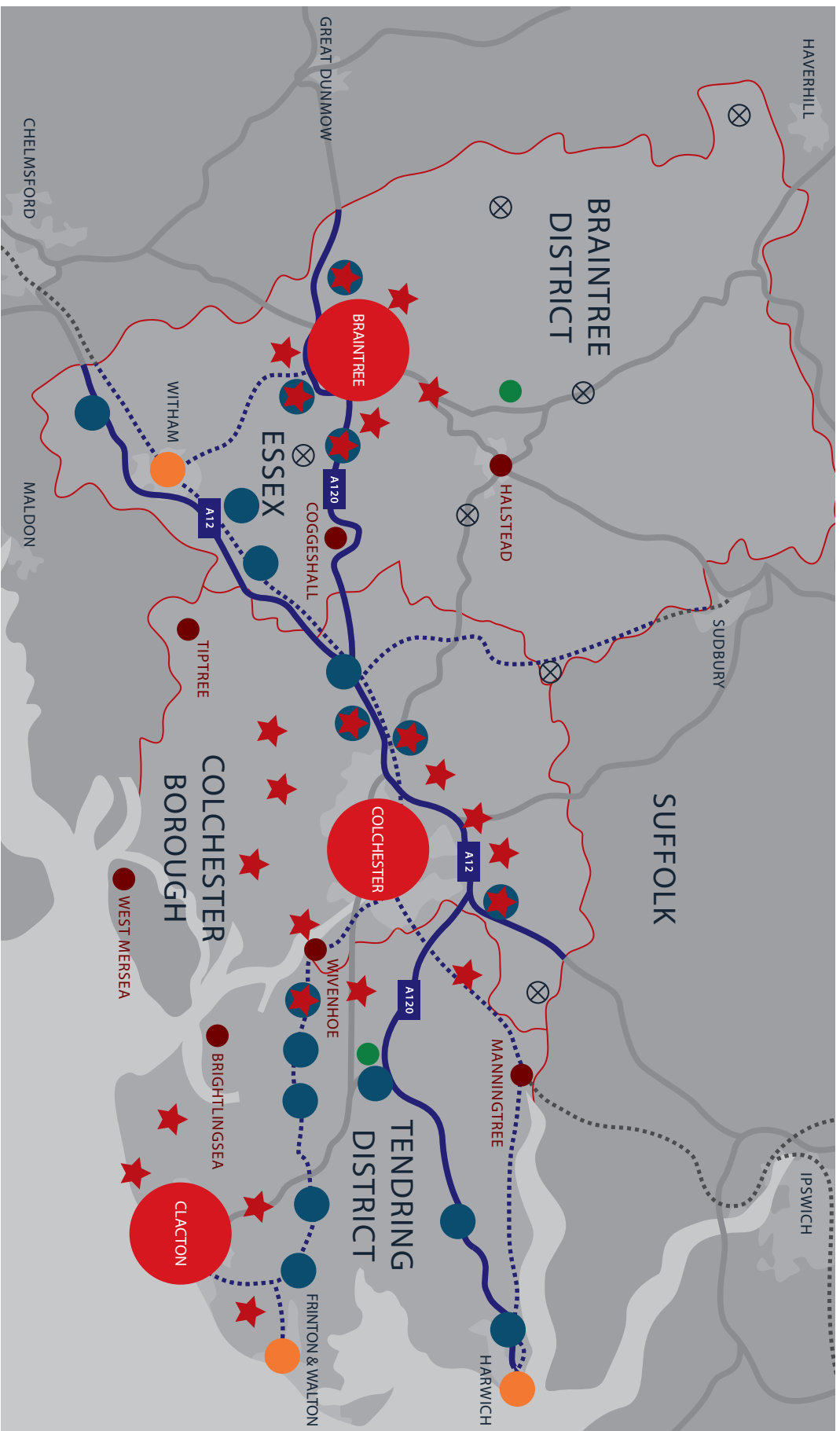
21. As stated in relation to Main Matter 1, with the abandonment of the two Garden Communities, there was an obligation to re-visit alternative spatial strategies which had not been supported because they were not preferred to a spatial strategy promoting large scale Garden Communities. However, with or without the inclusion of Garden Communities, the spatial strategy and its associated settlement hierarchy will not deliver the most sustainable pattern of future development because it fails to sufficiently reflect the need to direct growth towards higher tier services, employment hubs, transport corridors and public transport.

22. It is on that basis that the Plan is not considered sound.

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AN ALTERNATIVE GROWTH STRATEGY FOR NORTH ESSEX



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- LARGE TOWNS
- MEDIUM-SIZED TOWNS
- SMALL TOWNS
- ★ KEY SATELLITE VILLAGES CLOSEST TO LARGE TOWNS
- TRANSPORT CORRIDOR VILLAGES
- GARDEN VILLAGES NOT EXCEEDING 5,000 DWELLINGS
- ⊗ LARGE VILLAGES
- NORTH ESSEX AND DISTRICT COUNCIL BOUNDARIES
- ROAD
- - - RAIL

ANNEX EGA2

AN ALTERNATIVE SPATIAL HIERARCHY FOR BRAINTREE DISTRICT

CATEGORY 1: LARGE TOWNS

Large Towns are defined as urban areas with a population of over 40,000 offering higher tier services (secondary education, health, shopping, leisure and major employment opportunities) accessible by public transport and hence provide the main focus for strategic growth.

Braintree+

CATEGORY 2: MEDIUM-SIZED TOWNS

Medium-sized Towns are defined as urban areas with a population of 15-40,000 offering some higher tier services accessible by public transport and hence provide some opportunities for strategic growth.

Witham+

CATEGORY 3: SMALL TOWNS

Small Towns are defined as urban areas with a population of under 15,000 offering a wide range of local services and employment opportunities accessible by public transport – and hence provide opportunities for non-strategic growth.

Coggeshall

Halstead

CATEGORY 4: GARDEN VILLAGES

Garden Villages are defined as new free-standing settlements not exceeding 5,000 dwellings offering a wide range of local services and employment accessible by public transport – and hence providing opportunities for strategic or non-strategic growth.

Gosfield Airfield

CATEGORY 5A: KEY SATELLITE VILLAGES

Key Satellite Villages are defined as rural settlements closest to the urban edge of Large Towns offering a reasonable range of local services but easily accessible to higher tier services by public transport – and hence providing opportunities for non-strategic growth.

Black Notley+

Bradwell*

Cressing Tye+

High Garrett

Panfield
Rayne (also a Primary Transport Corridor Village)
Stisted

CATEGORY 5B: PRIMARY TRANSPORT CORRIDOR VILLAGES

Primary Transport Corridor Villages are defined as rural settlements lying on or close to the main lines of road and rail transport offering a range of local services but with good access to higher tier services in Large Towns by public and private transport – and hence providing opportunities for non-strategic growth.

Hatfield Peverel+
Kelvedon & Feering+
Rayne (also a Key Satellite Village)

CATEGORY 6: LARGE VILLAGES

Large Villages are defined as important rural service centres which lie some distance from Large Towns and the main transport corridors and hence with opportunities for non-strategic growth.

Bures Hamlet+
Earls Colne
Great Bardfield
Sible Hedingham
Silver End
Steeple Bumpstead

CATEGORY 7: SMALLER VILLAGES & HAMLETS

Smaller Villages and Hamlets are defined as all other rural settlements having only limited local services and often with minimal or no access to public transport – with opportunities for non-strategic growth in the form of minor infilling, rounding-off and rural exception sites subject to environmental considerations.

Footnotes:

‘Strategic Growth’ is defined as sites or allocations of more than 2,000 dwellings.

+ Settlements with railway stations.

*Not also categorised as a Primary Transport Corridor Village in view of proposed re-routing of A120.