

Braintree District Local Plan Part 2 - Examination

MM7: Prosperous District – Housing – Strategic Growth Locations 2 Policy LPP 22 – Land at Feering

Wood plc for The Crown Estate (Ref: 178269)

Introduction and Context

1. Wood is instructed on behalf of The Crown Estate as the main landowner (circa. 97%) and promoter of Land at Feering under draft Policy LPP 22.
2. The Crown Estate supports the proposed allocation of this site as a location to help meet growth requirements. Wood (Formerly Amec Foster Wheeler) has been working with BDC since 2014 to determine the suitability and potential of this land.
3. A Statement of Common Ground (SoCG) has been agreed with Braintree District Council about the delivery and development of this site and the revised wording of Policy LPP22. The policy wording set out in the SoCG supersedes earlier representations made by Wood on this matter.
4. The following sections respond directly to the Inspector's questions regarding LPP22.

Q.1 Is Policy LPP22 and site allocation justified by appropriate available evidence, having regard to national guidance, and local context, including meeting the requirements of the BLP Section 1?

5. Yes, LPP 22 is a sound allocation that fully accords with and advances the policy thrust set out in the NPPF (2012) and the BLP Section 1.
6. The allocation of the site fully accords with Policy SP3 Spatial Strategy which seeks to expand existing settlements taking in to account a combination of factors such as their scale, sustainability and their role. At 3.3 the BLP expands on Policy SP3 explaining that for Braintree District this means that, alongside growth at Braintree itself, the main growth focus will be the A12 road/rail corridor (Great Eastern Mainline). Specific reference being made to Kelvedon and Feering as a Key Service Village and suitable location for growth. This approach then flows through into the Section 2 Plan being set out at in the Spatial Vision at 5.13, articulated on the Key Diagram (Picture 5.1) and through the housing allocations in Policy LPP17. The strategy was assessed as part of the SA process (SA Report BDC025/1/2) and identified as the preferred option when the deliverability and sustainable transport opportunities are identified in the A12 road/rail corridor.
7. Section 1 Policy SP6 deals with 'Infrastructure and Connectivity' requiring the provision of facilities and services to serve the needs arriving from development. SP6B deals with transportation and the need to increase opportunities for non-car travel and maximise

- integrated transport opportunities and use of the rail network to serve locations for large scale growth.
8. This strategy has been examined and found sound.
 9. The NPPF seeks to deliver sustainable development and at NPPF17 sets out 12 core planning principles. The Section 2 Spatial Strategy and the allocation of LPP22 accords with these principles. In examining plans NPPF182 not only requires justification but also that the plan is 'effective', in other words deliverable over its period. Deliverability is one of the key advantages of land at Feering as explained below.
 10. The land needed to deliver the allocation requirements of LPP 22 is already within the single ownership of The Crown Estate. The first phase of the scheme is under construction by Bloor Homes for 162 dwellings with 40% being affordable (Ref: 16/0569/OUT, 19/01222/REM). Major highway work to the A12 is funded and being progressed by Highways England. The latest programme indicating that the road would be fully open to traffic by 2027-28. These works include a new all-moves Junction 24 immediately adjacent to the proposed LPP 22 allocation accessed off the Inworth Road (See Concept Plan at Appendix A for the indicative context). This demonstrates the deliverability of the site and the perhaps unique advantage of having a large site controlled by single landowner, in a highly sustainable location and supported by committed strategic infrastructure improvements.
 11. Furthermore, the land being proposed is not identified as being of high environmental or historic value and is not subject to any other major constraints or designations. It is physically contained by the existing presence of the A12 as a robust boundary separating it from the wider countryside. It can provide a residential led mixed-use scheme that will deliver a range of housing, employment, and improved community facilities. Wider land ownership at Feering outside the allocation boundary (25ha) provides further opportunities for improved green infrastructure and delivery of biodiversity net gain. These opportunities will reinforce the sustainability of Kelvedon and Feering as Key Service Village at a node in a genuinely multi-modal transport corridor.
 12. The access and movement strategy proposes delivery a new link road between London Road and Inworth Road, the detailed nature of which is to be determined through the masterplanning process (referred to in LPP48 New Road Infrastructure). This will increase permeability for public transport but also help relieve pressure on the Gore Pit Junction in Feering, by improving access to the new A12 Junction 24 and by creating a more resilient network. With committed infrastructure right on the doorstep, and with bus and rail access it supports the planning principle of managing patterns of growth to make the fullest possible use of public transport, walking and cycling and focusing on locations that are or can be made sustainable (NPPF17).
 13. It is concluded that the allocation of LPP22 supports and advances the policy thrust set out in the NPPF, the Section 1 Plan and the emerging Section 2 Plan. It has full regard to the local context given that the site has been demonstrated to be deliverable (also in single ownership) and in a highly sustainable location, free of major constraints utilising land of lesser

environmental value. Development in this location will also make best use of sustainable transport opportunities and committed infrastructure improvements such as the A12.

Q2 Do the housing allocations identified above show how they will contribute to the achievement of the overall housing requirement of the BLP Section 1 (14320 new homes) and its timescale for delivery?

14. A SoCG has been agreed with BDC which sets an agreed housing trajectory for LPP 22. This demonstrates that there is a reasonable prospect that the site would be developed to its full extent (About 835 dwellings) within the plan period to 2033.
15. It is assumed that circa. 795 homes might be delivered on Crown Estate land and say 40-50 homes on the smaller 2ha parcel controlled by Countryside Properties (off the Inworth Road). It assumes that delivery would commence in about 3 to 4 years and that the site might achieve an average completion rate of about 100dpa allowing for the expected fluctuations in delivery on large sites.
16. Pre-application discussions have already commenced with BDC and a Planning Performance Agreement (PPA) is currently being agreed. The current programme proposes submission of a planning application late summer/early autumn 2022. Discussions are progressing with Highways England to ensure alignment with the design and delivery of LPP22 and the A12 improvements. Ecological survey work has commenced, and a programme of seasonal species surveys is being completed over the coming months and in to early 2022. Major offsite highways work associated with the A12 are committed and therefore the risk of delay to housing delivery is considered low.
17. Deliverability is already demonstrated by the fact that Phase 1 is already under construction by Bloor Homes following The Crown Estate having secured outline planning permission. This permission has been designed to facilitate delivery of a comprehensive scheme and provide easy connections for subsequent phases on retained Crown land allocated under LPP 22.
18. BDC delivery rates evidence (Topic Paper 2 Housing) indicates that large sites can be expected to deliver at an average rate of about 80dpa. It also indicates that where large sites have multiple outlets delivery can be increased with evidence of rates of up to about 140dpa (with two outlets). Discussion with our Phase 1 developer correlates well with this data in that their build programme is looking at full year completion rates running at about 65-70dpa.
19. However, LPP22 is a far larger site and lends itself to multiple outlets being in three distinct parcels (land north of London Road, land between London Road and Inworth Road which includes Phase 1 and land south of Inworth Road). Developer feedback indicates there is appetite for a second phase and scope to open a second outlet, offering a wider range of products, in tandem whilst also delivering at a similar rate to Phase 1. This supports the view that on large sites rates in excess 100dpa are achievable and can be expected.

20. It is therefore considered that the delivery of LPP 22 at an average delivery rate of 100dpa for say 7-8 years of the plan period to 2033 is a realistic prospect. This reflects local evidence and builds in some allowance for delay, competition and/or fluctuations in delivery rates (both lower and higher). Given that major off-site infrastructure, in the form of the A12, is being delivered by Highways England it is not anticipated that there are likely to be major barriers to achieving the growth proposed by the Plan at Feering.

Q3. Do policies LPP 21 to LPP 23 provide clear direction as to how a decision maker should react to a development proposal in relation to these allocations?

21. It is considered that modifications are required to ensure Policy LPP 22 is justified and effective. This is partly to reflect the passage of time and changing requirements.
22. The SoCG between The Crown Estate and Braintree District Council sets out an agreed and effective form of wording for this Policy. The policy has been drafted with sufficient flexibility to enable a masterplan led approach to be progressed with key stakeholders and the local community.

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Appendix A – Site Concept Plan with A12 Context (the masterplan is indicative only and is to be updated when the A12 route design is fixed)

