

Saturday 17<sup>th</sup> July 2021

Mr Mark East

Hatfield Peverel

Chelmsford

Essex

CM3

The Planning Inspectorate

Temple Quay House

Temple Quay

Bristol

**FAO: Inspector Jameson Bridgwater PGDipTP MRTPI and Anne Jordan BA (Hons) MRTPII**

“Without Prejudice”

Dear Sir/Madam

Re: Braintree Local Plan – Section 2 – Spatial Strategy

Given new evidence submitted by QC Tucker on behalf of his client with regard to the Sustainability Appraisal, I would like to make comment for your consideration.

I do not believe that it is in the public interest to delay yet further the examination of the plan and to the layman the legal submission challenging the legality of the SA only frustrates the making of the plan for the benefit of developers. Large swaths of development to meet the housing need are already underway and/or permissions have been granted. To review alternatives at this stage only undermines a plan lead approach to development and harms public confidence in the planning system. It is my understanding that planning consents once granted can't usually be reversed.

You will appreciate that Inspector Clews gave detailed consideration to the housing need of the district and whilst acknowledging that there was some evidence to support a revision downwards he concluded that it was not so great as to warrant a further consultation. This is perhaps of some importance as it demonstrates a rather more generous buffer of supply than being purported by developers.

It appears that Inspector Clews did consider the spatial strategy and whether given the removal of the Garden Community he has considered, in broad terms, whether it would require significant amendment. Given the evidence he had before him and at the time of writing his report, it seems he had no great concern that the LPA would fail to deliver sufficient housing and it was in accordance with the spatial strategy.

Whilst the Garden Community allocation in Section 1 was fiercely opposed by some, the Section 2 allocations are broadly accepted by the community and/or there have been planning consents outside of the emerging plan on grounds that the LPA could not demonstrate a 5 YHLS. It was confirmed by participants during the examination that they all accepted that the LPA could demonstrate a 5 YHLS under NPPF 2012.

I do not feel there is objective evidence to suggest that the LPA cannot meet their housing need for the plan period at this point in time. Furthermore I doubt that substantial evidence will come forward to demonstrate that the Sustainability Appraisal is fundamentally flawed to the extent that you must find it unsound.

Whilst I acknowledge that I had concerns about the Sustainability Appraisal I recognise the planning consents are fixed and consequently any review should be considered minor in nature.

My final point is that it is my understanding that the LPA must monitor the delivery of housing and review the plans suitability within 5 years. It seems to me that this provides the mechanism to address any concerns on under supply of housing or other.

Yours sincerely

Mark East

My Profile

I was a Chartered Insurance Practitioner and qualified Lead Assessor (ISO9001). I held the title of Group Quality Director, Jardine Lloyd Thompson with a small team of International auditors reporting to me. Over a 15-year period our mission was to mitigate the Group exposure to Error & Omission. During my 15 years at the helm more than 20,000 individual audits were conducted.