



Braintree Local Plan Section 2

Examination Hearing Statement

Main Matter 2 (The Spatial Strategy)

**Prepared by Strutt & Parker on behalf of Trustees of the Bradwell Estate
(Respondent ID:867287)**

June 2021

1. Introduction

- 1.1 Strutt & Parker submitted representations on behalf of The Trustees of the Bradwell Estate ('Bradwell Estate') on the Publication Draft Local Plan Section 2 in July 2017. Representations were also made as part of consultations undertaken throughout the earlier stages of the Plan since the initial Call for Sites in 2014.
- 1.2 The most recent representations were duly made, and recorded as comment ID 749 and 750 for respondent ID 867287.
- 1.3 Bradwell Estate's principal interest in respect of the Local Plan Section 2 (LPS2) relates to land at Church Road, Bradwell, and their key concerns in respect of the LPS2 is the lack of growth it directs to Bradwell, a Third Tier Village within the LPS2 Settlement Hierarchy.
- 1.4 This Hearing Statement concerns Main Matter 2 (the Spatial Strategy) of the LPS2 Examination.
- 1.5 Some four years has elapsed since the LPS2 was prepared, and there have been a number of material changes in circumstances since then that are pertinent to the LPS2. Such changes have exacerbated concerns raised back in 2017, including in relation to the proposed spatial strategy and whether the LPS2 represents the most appropriate strategy for meeting Braintree's development needs.
- 1.6 The LPS2 is being examined in relation to the NPPF 2012, as per the NPPF 2019 transitional arrangements. As such, references to NPPF within this Hearing Statement are to the NPPF 2012, unless otherwise stated.

2. Main Matter 2

Question: Is the Spatial Strategy for Braintree justified by appropriate available evidence, having regard to national guidance, and local context, including Section 1 of the BLP?

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 We consider it is important to recognise that:

- a) The LPS2 is required to be the *most* appropriate strategy when considered against reasonable alternatives. This is an express requirement of a sound Local Plan, as per NPPF paragraph 182.
- b) The Local Plan Section 1 (LPS1) and LPS2 were prepared and submitted as a single Local Plan, and changes to one section have the potential to have significant implications for the other.

Bradwell

2.2 Bradwell is recognised as a Third Tier settlement in the LPS2 Settlement Hierarchy. The LPS2 defines Third Tier settlements as the smallest villages in the District that lack most of the facilities to meet day to day needs, often with poor public transport links and travel by private vehicle usually required. When considering the ability to achieve sustainable development, this will not **normally** be expected within a Third Tier Village (emphasis added).

2.3 Whilst its designation as a Third Tier settlement is not being questioned, the LPS2 provides a catch-all definition for these types of settlement which is not necessarily reflective of the specific merits of individual villages themselves, and in this case Bradwell.

2.4 The spatial strategy should still recognise the importance of providing growth and development in the smaller/rural settlements of the District. The NPPF makes clear that one of the core planning principles that should underpin both plan-making and decision-making is the need to support village communities:

“Planning should... take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them,

*recognising the intrinsic character and beauty of the countryside and **supporting thriving rural communities within it***". (NPPF paragraph 14, emphasis added).

- 2.5 The NPPF requires planning policies to support economic growth in rural areas, including through ensuring retention and development of local services and facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship (paragraph 28).
- 2.6 The NPPF recognises that in promoting sustainable development sustainable transport will play an important role in facilitating this. However, the Government also recognises that different policies and measures will be required in different communities and **opportunities to maximise sustainable transport solutions will vary from urban to rural areas** (paragraph 29, emphasis added).
- 2.7 Paragraph 34 of the NPPF also states plans should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. **However, this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas** (emphasis added).
- 2.8 In addition, the NPPF states at paragraph 55 that to promote sustainable development in rural areas, **housing should be located where it enhances or maintains the vitality of rural communities** (emphasis added).
- 2.9 Further to the requirements of the NPPF, the Planning Practice Guidance (PPG)¹ explains how Local Planning Authorities should support sustainable rural communities:

"It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements".

And

*"A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. **Rural housing is essential** to ensure viable use of these local facilities".* (Emphasis added).

¹ Paragraph: 001 Reference ID: 50-001-20140306

- 2.10 The above paragraphs are particularly applicable to Bradwell. Despite the LPS2's definition of Third Tier settlements which typically suggests poor transport links in these locations, the situation in respect of Bradwell is not typical or "normal" given its location along the A120, and regular bus services that run through it (circa every half hour for most of the day). The village also contains a number of services, including a church, a village hall, local restaurant and bar, convenience store, a petrol station and local playing fields.
- 2.11 Given the context of the above cited paragraphs from the relevant national planning policy and guidance, the provision and access to services and in particular local transport should be balanced with the importance placed on maintaining and enhancing the vitality of rural communities. Bradwell is a long established settlement and community, located on the River Blackwater, with its church dating back approximately 1000 years. By the turn of the 20th Century the village had a shop, 3 public houses, 2 mills, a school and a number of cottages were built. Although the array and type of services have changed over the years, the village has continued to grow with population figures almost doubling from the 19th Century (296 to 486) just before the turn of the 21st Century.
- 2.12 The vitality of rural communities such as Bradwell (as set out above) is dependent on its continued proportionate growth. Growth in these smaller settlements should therefore not be overlooked otherwise the LPS2 is at risk of undermining the vitality of these villages and sustainable development within the District as a whole. As it stands there is a lack of a positive strategy for growth in these villages and the Plan risks no new homes being provided for Bradwell over the entirety of the plan period.
- 2.13 We do not consider that the LPS2 proposes the most appropriate strategy for Bradwell. Bradwell will not experience any growth, which in turn reduces the opportunity to maintain and enhance the village in the interests of its vitality.

Summary

2.14 In summary:

- No growth has been allocated to the village of Bradwell, which we understand is primarily due to its designation as a Third Tier village. The LPS2 does not take into account national planning policy and guidance that sustainable development should be promoted by maintaining or enhancing the vitality of rural communities through provision of housing. Through Bradwell's designation as a Third Tier village, it is being under represented in a wide-ranging tier given that its links to other modes of sustainable transport and access to services, particularly along the A120, make it a more sustainable rural location for growth and development than that portrayed by its Third Tier categorisation. In this context the need to promote the vitality of smaller rural settlements such as Bradwell needs to be balanced against its access to services and other modes of transport, and a proportionate number of dwellings should be directed towards these settlements respectively.

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

2.15 For the reasons set out above, we do not consider LPS2 provides a sound spatial strategy supported by robust evidence, insofar as it concerns Bradwell. Consequently, we do not consider that the settlement boundaries predicated on the spatial strategy can be considered sound.

2.16 We consider it is also pertinent to note that in recent years the District's housing land supply has often fallen below the requisite five-year supply, resulting in development having to take place beyond settlement boundaries established within the Development Plan in order for needs to be met. In light of our concerns in relation to the ability of the LPS2 to meet housing needs in full and to maintain a five-year housing land supply throughout the plan period, (as set out in our Main Matter 5 Hearing Statement), we consider that there is a significant risk that once again development beyond proposed settlement boundaries will be required in the future in order to ensure sufficient homes are provided. This risks an ad-hoc approach to delivery of housing, and in our view the most appropriate strategy would be to ensure settlement boundaries were drawn with sufficient flexibility to enable additional growth to that which the LPS2 allows and in the most sustainable of locations.

2.17 The settlement boundary as currently drawn around Bradwell stifles the amount of growth that can be delivered within the village over the plan period, risking undermining the vitality of the village and undermining sustainable development within the District.