

**Documents referred to:**

1. BDC Publication Draft Local Plan Section 2 2017
2. BDC LP Section 2: SDBDC 008 Minor Modifications (2020)
3. BDC LP Section: SDBDC 008a Further Suggested Changes 1/3 and 3/3 (May 2021)
4. BDC Topic Paper 2 Housing including Appendix 1 - Housing Trajectory (May 2021)
5. BDC MM5 questions response re LPP 17 housing
6. BDC MM7 questions response re LPP 22 Feering SGL
7. BDC SCG014 Statement of Common Ground Feering: between BDC & Crown Estates (June 2021)
8. Crown Estate / Woods Written Representation re LPP 22 Land at Feering (ref: 178269) (16 June 2021)
9. Highways England A12 widening DCO Statutory Consultation documentation (June 2021)
- 10: FPC consultation responses in 2016 & 2017

**Main Matter 5**: A Prosperous District – Homes – Policy LPP 17

Q1 Does BLP Section 2 and in particular Policy LPP 17 Housing Provision and Delivery demonstrate an adequate supply to meet Braintree's housing requirement as set out in BLP Section 1 (14320 new homes) and its timescale for delivery within the plan period 2013 - 2033?

**FPC representation: NOT precisely. To make the BDC LP sound (clear & unambiguous) clarity is required regarding the number of homes expected from the Strategic Growth Location "land at Feering" over the plan period in LPP 17 and that the same number carries across into LPP 22.**

(a) clarify that the Strategic Growth Location "land at Feering" comprises the 3 parcels - FEER 230 in the ownership of Countryside Properties and FEER 232 & 233 in the ownership of Crown Estates as per Inset Map 23 - Feering. Some documentation appears to refer just to the two Crown Estates parcels.

*SEE: Crown Estates / Wood written representation paragraph 10 states.. "The land needed to deliver the allocation requirements of LPP 22 is already within the single ownership of The Crown Estate".*

(b) clarify whether the number of new dwellings on the Feering SGL (being the three parcels FEER 230, 232 & 233) in the plan period to 2033... is up to 750, or 755, 795 or 835 or some other number.

*SEE: BDC LP 2017, LPP 17 = 750 BDC MM24 in SDBDC 008a (May 2021): LPP 17 = 755*

*BDC Topic Note 2 Housing: 795 homes referencing LPP 17 but 755 in Appendix 1.*

*BDC SCG014 (BDC & Crown Estates): Part B = 835 dwellings; Part A planning permission = 165 homes*

*Highways England Traffic Modelling Report page 34, Not in Core Scenario: Strategic Growth Location, Land south of Feering / west of A12 = 795 dwellings, 15% built by 2027*

(c) clarify whether the number above includes or excludes the 162 homes currently being built by Bloor Homes on the part of FEER 233 shown as FEER 233a on the amended Inset Map 23 - Feering (May 2021).

(d) confirm that the number of homes for SGL "land at Feering" in LPP 17 is the number of homes that will be carried through into policy LPP 22 Strategic Growth Location - Land at Feering.

(e) confirm that IF the area of parcels FEER 233 & FEER 232 (Crown Estates) inside the pink wash Feering Strategic Growth Location and Feering development boundary as per Inset Map 23 - Feering DECREASES due to land being required by Highways England (e.g. for attenuation ponds, planting, etc) then the number of homes on the Feering SGL will decrease in proportion.

(f) confirm that the eastern boundary of the SGL "land at Feering", which abuts the current A12, will stay as shown on Inset Map 23 - Feering. It will not be moved to abut the line of the new A12 which is shown somewhat further east on the Highways England DCO statutory consultation plans (e.g. GA sheets 14 & 15). Also applies to policy LPP 22 Feering SGL.

Q2 Does BLP Section 2 adequately address the needs for all types of housing and the needs of different groups in the community (as set out in paragraphs 50 and 159 of NPPF)?

**FPC representation: Yes provided that development in Feering respects the local needs as identified in the Feering Neighbourhood Plan, which is at Regulation 15 submission stage, and specifically FNP Policy 4 Housing.**

The housing needs in the Feering Neighbourhood Plan (FNP) area differs from the average need over the whole of Braintree District in that more need is identified in Feering for small and medium sized housing of 2-3 bedrooms and bungalows and other properties suitable for downsizing

Q2 Does BLP Section 2 make adequate provision through site allocations to meet the housing requirement of for Gypsies, Travellers and Travelling Showpeople in Braintree?

**FPC representation: none**

### **Main Matter 7:** A Prosperous District – Homes – Strategic Growth Locations 2

Policy LPP 21 Strategic Growth Location - North West Braintree

Policy LPP 22 Strategic Growth Location - Land at Feering

Policy LPP 23 Strategic Growth Location - Wood End Farm, Witham

Q1: Are the above policies and site allocations justified by appropriate available evidence, having regard to national guidance, and local context, including the meeting the requirements of the BLP Section 1?

Q2: Do the housing land site 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?

**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?**

**FPC representation: NO.**

**(i) The various proposed BDC modifications, SOCG and representations have resulted in inconsistencies in the pre-amble text and in matters bullet pointed in Policy LPP 22 Strategic Growth Location - Land at Feering.**

**(ii) FPC did not agree with some of the text and polices in the original BDC 2017 Submission Draft Local Plan - see the FPC consultation submissions.**

**A. 1<sup>st</sup> bullet: number of homes - see FPC representation re LPP 17 and Feering SGL**

**See LPP 17 representation re points to be clarified for a sound (clear & unambiguous) plan**

- Original 2017 publication draft text: Up to 750 new homes of a mixed size and type appropriate to the area
- Mm15 SDBDC 008 (2020) modification to: Up to 750 new homes of a mixed size and type appropriate to the area as part of a larger development of up to 1000
- MM29 SDBDC 008a (May 2021) - NO modification to LPP 22 but there are different numbers in other documents:
  - LPP 17 Housing Provision & Delivery: SGL Land at Feering
  - BDC Topic Paper 2 - Housing & Appendix 1 Housing Trajectory
  - BDC SCG014 Feering: BDC & Crown Estates

**CONTINUED - separate MM7 document re remaining LPP 22**