

North Essex Authorities
Joint Strategic (Section 1) Plan
Examination Hearings

Hearing Statement

**prepared by David Lock Associates (DLA) on behalf of The Unex Group in
relation to the Former Towerlands Park site, Braintree**

INTRODUCTION

- This Hearing Statement (herein known as ‘the statement’) has been prepared by David Lock Associates (‘DLA’) on behalf of The Unex Group in relation to the Former Towerlands Park site, Braintree.
- Representations have been submitted previously on behalf of The Unex Group in August 2016 and July 2017 in relation to Section 1 of the Plan, specifically Policies SP2 (The Spatial Strategy for North Essex), SP3 (Meeting Housing Needs), SP5 (Infrastructure and Connectivity, and SP6 (Place-Shaping Principles).
- Whilst the Former Towerlands Park site is proposed to be allocated as a Strategic Growth Location under Policy LPP 20 of Section 2 of the emerging Braintree District Local Plan (Publication Draft for Consultation), the strategic policies listed above are considered relevant to The Unex Group and therefore this statement has been prepared in accordance with the requirements of the Inspector of the Local Plan Examination.
- This statement seeks to confirm The Unex Group’s support for the North Essex Authorities Joint Strategic (Section 1) Plan and has responded to the questions pursuant to the strategic policies that previous representations have been submitted for. No new material is included as part of this statement.
- This statement is provided without prejudice to other matters of detail that the parties may wish to raise during the hearing sessions of the examination and we reserve the right to amend and vary this statement as necessary.

QUESTIONS

- This Hearing Statement responds to the following questions:
 - a. Matter 2 – Question 6
 - b. Matter 3 – Question 2
 - c. Matter 3 – Question 5
 - d. Matter 7 – Question 1
 - e. Matter 7 – Question 3
- No comments are provided on any of the other questions.

- **Matter 2 – Question 6: Is there an effective relationship between policy SP6 and the design policies in each local planning authority's Section 2 Plan?**

Policies LLP 7 and LLP 55 relate to design within Braintree regarding Design and Layout of Employment Policy Areas and Business Uses, and Layout and Design Development respectively. We did not submit representations in relation to Policy LPP 7 of the Section 2 Local Plan and will therefore remain silent on this policy. With regards to Policy LPP 55, we consider that the structure and wording of the policy relates effectively to Policy SP6 and provides a suitable link from more high-level policies which relate to strategic scale development to details which are likely to be considered as part of full or reserved matters applications. It is likely however that most new development would need to refer to both of these policies and their consistency with one another will be beneficial for the LPA in terms of Policy Appraisals.

- **Matter 3 – Question 2: Are the proposed overall housing requirement in policy SP3 of 43,720 dwellings (2,186dpa), and the constituent requirement figures of 14,320 (716dpa) for Braintree, 18,400 (920dpa) for Colchester and 11,000 (550dpa) for Tendring, based on a sound analysis of the available and relevant evidence, and do they reflect the full, objectively-assessed need for housing over the period 2013 - 2033?**

Our response relates specifically to Braintree. The Unex Group has continually supported the housing numbers proposed in the emerging Local Plan for Braintree and we write to confirm that the numbers proposed in Policy SP3 are based on a sound analysis of the available and relevant evidence and reflect the full objectively-assessed need for housing over the period 2013-2033. Please refer to the representations submitted by David Lock Associates (DLA) in our covering letter of 20th July 2017 in relation to SP3 for further explanation.

- **Matter 3 – Question 5: Should policy SP3 make it clear that the five-year supply of housing land must include an appropriate buffer in accordance with NPPF paragraph 47?**

It is considered appropriate to include the relevant buffer in Policy SP3 for each respective LPA to reflect their track record for delivery of housing over previous years. This will be in accordance with the requirements of Paragraph 47 of the NPPF. The relevant buffer could be reconsidered as part of any review of the Local Plan to take account of LPAs that meet or indeed fail to meet their respective annual housing delivery targets.

- **Matter 7 – Question 1: Taking account of the Sustainability Appraisal and other relevant evidence, is the spatial strategy in policy SP2 justified as the most appropriate development strategy for North Essex, when considered against the reasonable alternatives?**

It is considered that the approach proposed in Policy SP2 is justified as the most appropriate development strategy for North Essex. It is widely accepted that extensions to existing settlements and the creations of new communities are the preferred locations and this is reflected in a number of recently adopted Local Plans. The Sustainability Appraisal acknowledges that Braintree is the largest settlement and service centre within the District and therefore the location for the highest allocation of homes. The majority of the assessment questions in the Sustainability Appraisal confirm that there is a strong prospect of Policy SP2 creating positive impacts for sustainability objectives. Please refer to the representations submitted by David Lock Associates (DLA) in our covering letter of 20th July 2017 in relation to SP2 for further explanation.

- **Matter 7 – Question 3: Does policy SP2 adequately and appropriately define the role of each tier in the settlement hierarchy?**

It is considered that the settlement hierarchy is adequately identified in the relevant policies of the Section 2 Local Plans. Notwithstanding that, the policy text of SP2 reinforces this that “existing settlements will be the principal focus for additional growth” and “development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role within each individual district. Both Policy SP2 and the relevant policies of the Section 2 Local Plans (in the case of Braintree, pages 26-28) relate sufficiently with one another and therefore it is considered that the settlement hierarchy is clear and appropriately defined.

CONCLUSION

- This Hearing Statement has been prepared to confirm The Unex Group’s support for the North Essex Joint Strategic (Section 1) Plan. We have offered responses which will relate to the proposed allocation as part of the emerging Braintree Local (Section 2) Plan (Policy LPP 20). These responses confirm support for the overall strategy of the Section 1 Plan in terms of identifying where new housing should be brought forward over the plan period and the overall housing target for the plan period.