

Matter 7 Hearing Statement: Lightwood Strategic

The spatial strategy for North Essex (policy SP2)

Main issues: Does the spatial strategy set out in policy SP2 represent the most appropriate strategy, when considered against the reasonable alternatives?

Does policy SP2 adequately and appropriately define the role of each tier in the settlement hierarchy?

Questions:

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?

- Monks Wood presents a reasonable alternative garden community that has been unjustifiably rejected.
- Our representations catalogue a number of plan-making issues that need to be addressed at this hearing.
- Paragraphs 3.11 set out the treatment of Monks Wood by Braintree Council. We question whether the Duty to Cooperate was met between March 2016 and the publication Regulation 18 consultation. We are unsure at what point the Monks Wood location was first shared with the other authorities. We do not know if within a Regulation 18 phase of plan-making the site formed part of the brief for the Kerslake Review in late 2016.
- All assessment of Monks Wood has been again the background of defending the chosen locations. It is difficult to see an unbiased, objective process.
- We regard the explanation of the spatial strategy that is presented in the Braintree Local Plan Sub-Committee (May 2016) as a useful document for the Inspector, and refer to our comments at paragraphs 3.27 to 3.50 of our representations. These are supported by Appendix 11. Additional representations on the adequacy of the content of the SA of the Plan in respect SP2 is presented at paragraphs 3.56-3.73. Annex C of the SA demands particular attention
- We present clear failing as question how these can be corrected in an unbiased way.

2) Why does the spatial strategy include provision, at the proposed garden communities, for substantial development beyond the Section 1 Plan period?

- It is not uncommon for large sites identified in Development Plans to stretch beyond the plan period. Lightwood Strategic is the lead promoter for one of Government sponsored Garden Villages known as 'Culm' in Mid Devon, where this is also the case. The scale of this new settlement is around 5,000 dwellings
- Clearly building at scale requires a long-term approach. However, of the North Essex it is the substantial nature of the scale of long term planning that is at issue, particularly in respect of Colchester/Braintree Borders.
- We do not assess that it is sound to plan for 15,000-24,000 dwellings the stage of plan-making and suggest that, this scale of development is needed to achieve a favourable (albeit discounted) viability profile. If this location cannot be delivered at a scale 5,000 homes it should not be identified. The same is true of West of Braintree. Such a scale of development would still stretch in the late 2040's. This is suitably term and leaves future planning decisions open to future cohorts.
- Paragraphs 4.63 and 5.3 of our representations conclude that 5,000 dwellings should be the upper limit at this stage.

3) Does policy SP2 adequately and appropriately define the role of each tier in the settlement hierarchy?

Section 4 of our representations set out the lack of economic analysis that had been brought to bear on the plan in respect of the introduction of new settlements into the economic geography of North Essex. Paragraphs 4.60-4.63 raised considerable concern on the credentials and impact of Marks Tey at the scale for a new town of up to 24,000 homes on Braintree and Colchester. Consequently, there is insufficient evidence to justify its potential role in the hierarchy

4) Is the detail in paragraphs 3.3 to 3.5 relevant to Section 1 of the Plan? If it is, should it be included in policy SP2?

Yes – (subject to the inclusion of Monks Wood in the Plan)

5) Should paragraph 2 of the policy refer to the need to avoid the coalescence of settlements?

Yes - if this is what is intended by “ensuring settlements maintain their distinctive character and role”.

6) Does the reference to “Garden City principles” in the last paragraph of the policy identify the principles that are intended with sufficient clarity? What is the relationship between these principles and the North Essex Garden Communities Charter (June 2016)?

Yes - Policy SP7 is, in our view, the place to present additional clarity.