

Colchester Conservative Group response...

Matter 8 Sustainability Appraisal

1) (a) Is there adequate justification for the threshold of approximately 2,000 dwellings (ASA Main Report para 2.52) which was applied when selecting the strategic sites to be appraised at Stage 1 of the ASA?

We do not believe the figure of 2000 dwellings has ever been justified. Despite being questioned by respondents to the consultations and on numerous occasions by members of the Local Plan Committee during meetings, officers have failed to adequately explain the reasoning for 2000 dwellings as the 'strategic' threshold. We can only surmise the figure was chosen as justification for the NEA's proceeding with Garden Communities/New Towns as a strategic growth option.

Savills Research documents state that Strategic Development Sites are 'mixed use and residential schemes with capacity for 250 or more housing units'. Gateshead Council with a population of 202,500 (ONS MYE 2018), somewhat larger than Colchester, designates sites of 100 and over or 2.5 Ha or more as 'strategic'. Therefore the term 'Strategic site' appears to have no 'hard and fast' planning definition.

One of the issues we identified in our earlier submission was the lack of clarity in the decision making process and the figure of 2000 is a good example of this, given that '**Principle 1**' of the ***Selection of Spatial Strategy Alternatives*** is to meet the residual housing need within the plan period. According to the evidence in Appendix 6 of the ASA, the figure of 2000 substantially overshoots the residual need for all three Authorities.

Importantly, the seemingly arbitrary decision to use the 2000 dwellings figure has resulted in smaller sites being rejected which might otherwise have met the NEA's residual housing need.

(b) If not, what threshold should have been applied, and why?

A difficult question to answer as in purely arithmetic terms it would depend on the size of the community the growth would be adding to. We would contend that for a smaller community a population growth of 10% could be seen as 'strategic'. The largest 'non-strategic' (open to interpretation) single site allocation in Section 2 of Colchester's Local Plan is 1000, therefore from a Colchester perspective that might suggest a figure over 1000 should be considered a 'Strategic size'. However if the ASA Appendix 6, 'Principle 1' is to be taken at face value, 1000 would still appear too high a figure.

2) Is the Stage 1 appraisal of alternative strategic sites based on sound and adequate evidence?

No, the alternative sites have not been tested on an equal basis with the now entrenched preferred options, with no analysis on viability, infrastructure requirements, transport and employment.

3) Has the Stage 1 appraisal of alternative strategic sites been carried out with appropriate objectivity and impartiality?

As someone privy to internal briefings I struggle with the question of impartiality. When the additional SA work identified the need to test a much larger number of sites and strategies we were told by the then Cabinet member for Planning, (at that time also a director of NEGC) that the result would be the same, we would end up with three Garden Communities, West of Braintree, Colchester Braintree Borders and Colchester Tendring Borders. Officers have always maintained that these three Garden Communities are 'our plan' and there has been a 'tunnel vision' approach to this since the early stages of the Plan when money began to be invested in their development in 2014/15. As stated in our answer to question 2, the NEA's now have an entrenched position with regard their preferred options. This may explain why alternative options have not been assessed on a like for like basis with the preferred options, with no viability nor transport analysis carried out.

As stated in our earlier submission, with huge amounts of officer time, £millions of public money already expended on the three Garden Community options and a Company set up by the NEA's and County Council to promote and deliver them, we do not believe the further work can possibly have been carried out with an appropriately open mind and therefore lacks objectivity and impartiality.

4) Does the ASA give clear and justified reasons (including in Appendix 6) for selecting the strategic sites that are taken forward from the Stage 1 to the Stage 2 appraisal, and for rejecting the alternative strategic sites?

No, see answer to question 3.

5) In seeking to meet the residual housing need within the Plan period to 2033 (ASA Appendix 6, Principle 1), should the spatial strategy alternatives for the Stage 2 appraisal seek to provide land for:

- a) 7,500 dwellings; or**
- b) 1,720 or 2,000 dwellings (the residual requirement identified in Appendix 6, Table 1); or**
- c) another figure?**

During the substantial amount of time between the start of the Plan making process and the submission of the Additional Evidence requested by the Inspector, planning and development have not stood still. The additional evidence demonstrates this in Appendix 6, Table 1. Rather than accepting that fact, the NEA's now appear to be justifying the Garden Communities which generate substantial housing overprovision within the plan period as a 'buffer'. At no stage during this process, in no reports nor meetings, has a requirement for a 'buffer' been presented or discussed, we have always been informed that the residual requirement for the three NEA's is 7,500 split equally between Colchester, Braintree and Tendring. This is important, had the true picture been presented, different decisions might have been taken, most particularly with regard the options presented to us by the Inspector in his post EiP letter of 8th June 2018. Section 2 allocations might also have been different. While we understand the requirement for a buffer in five year supply, we can find no evidence for the requirement of a buffer in a Local Plan. Indeed a robustly evidenced Local Plan should not require one.

Table 1 is such a key piece of evidence that we have questioned its veracity. Despite it being submitted as evidence it appears it may be factually incorrect, we understand that the residual requirement for Colchester may be closer to 1440 than the 900 we had assumed in our consultation response when extrapolating from the figures in Appendix 6, Table 1. No doubt the

EiP will get to the bottom of this but given the information we have, in Colchester's case we believe the spatial strategy alternatives should seek to provide only for the residual requirement. The numbers involved do not justify the NEA's Garden Community options.

6) (a) Is the allocation of residual housing need between West of Colchester and East of Colchester on a 2:1 ratio (ASA Appendix 6, Principle 3) justified by relative housing need and commuting patterns?

(b) If not, what alternative spatial allocation of residual housing need would be justified, and why?

Colchester has declared a Climate Emergency. Effectively this means that circumstances have changed quite substantially since the inception of our Local Plan. Indeed, they have changed between the first EiP and now. In their briefing paper of February 2019 'Planning for less car use', Friends of the Earth have recommended that *'plans and funding for new towns and car-dependent garden communities' should be cancelled*. If we are truly to embrace the climate change issue we may need to take a fundamentally different approach to how and where we allocate housing. We will need to re-examine housing density, ensure maximum use of existing infrastructure, invest in its improvement where required and in walking and cycling networks and high quality public transport. This will take time and will require a large amount of work, perhaps best undertaken as part of a focussed Plan review. We have outlined briefly how we believe Colchester's residual requirement might be accommodated in our consultation submission. We would contend that designating large tracts of countryside for Garden Community/New Town development at this moment in time, is not a decision that should be made now, and given the actual residual housing requirement, it is not a decision that needs to be taken now.

7) (a) Is there adequate justification (including in Appendix 6) for the selection of spatial strategy options to be appraised at Stage 2 of the ASA?

As outlined in question 5, we do not believe the spatial strategies have been justified adequately as they are based on a buffer rather than residual requirement.

(b) If not, what other spatial strategy option(s) should be assessed, and why?

See answer to 6b.

8) Is there justification for basing the proportionate (hierarchy-based) growth spatial strategy options (West 2 and East 2) on different settlement hierarchies from those identified in the NEAs¶ Section 2 Plans?

Given the numbers involved it appears not.

9) Is the Stage 2 appraisal of spatial strategy options based on sound and adequate evidence?

No, it is fundamentally flawed given that its premise is to meet a set of principles which are (as already stated) flawed.

10) Has the Stage 2 appraisal of spatial strategy options been carried out with appropriate objectivity and impartiality?

Please refer to our answer to question 3. While much of this process has been quite opaque, elected members briefings do shed some light, and we cannot agree that this process has been impartial.

11) Does the Stage 2 appraisal adequately and appropriately evaluate the spatial strategy options at both the end of the Section 1 Plan period and as fully built-out?

12) Does the ASA give adequate and appropriate consideration to:

(a) effects of overflying aircraft to and from Stansted airport?

(b) impacts on operations at Andrewsfield airfield?

(c) impacts on heritage assets?

(d) impacts on water quality?

(e) impacts on air quality?

13) Does the ASA give clear and justified reasons (including in the Main Report Conclusion and in Appendix 8) for selecting the preferred spatial strategy option and for rejecting the alternatives?

14) Does the ASA provide all the information required by Schedule 2 of the *Environmental Assessment of Plans and Programmes Regulations 2004* (as amended), including identifying:

(a) cumulative effects on the environment; and

(b) measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment?