

Wivenhoe Town Council – Matter 8 Hearing statement – 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 there is adequate justification for this figure. This was raised by many stakeholders in the method scoping consultation and has never been adequately addressed.

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

Without the NEAs definition of what a strategic site is, this is difficult to determine. Also it would be dependent on whether the site was an urban extension or a standalone site. Currently we would consider sites over hundred that form an urban extensions strategic. However a relevant threshold could also be 1400 as this is the trigger for a primary school. A concern we originally had with the 2000 threshold, was that it excluded many willing developers promoting sites. As those sites did not comply with this arbitrary figure they were rejected before any assessment of their merit as sites was conducted.

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

We do not believe so. This has been outlined in our previous submissions.

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

The criteria set for the appraisals was not objectively or impartially selected so the results extracted from it could not be either.

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?

We do not believe so and have outlined this in our previous submission. Ref chapter 11 – Reason for rejecting sites. In particular the reasons for rejecting Weeley as a site are highly questionable. Weeley could have provided an existing and therefore inexpensive RTS via the train line. New employment provision within this central Tendring location that would have had a positive effect on existing commuter patterns. Also it would use land of a far lower agricultural value than the site at TCBGC.

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?

We believe c. This is not based on our previous submission when we thought the calculations provided by LUC for Braintree were correct.

We now learn that Braintree's OAN is 716 per annum amounting to 14,320 over the plan period. Therefore the residual need based on permissions already granted is next to zero (98% of need already covered and probably over 100% by now given there's been further permissions since this analysis done). This leaves Braintree are in the same position as Tendring. In not needing any allocation via the GCs in the plan period and Colchester having to find around 900 homes in the plan period. Consequently the 7,500 figure cannot be accounted for and we believe it was set to justify the three Garden Communities. Consequently our figure would be 900.

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?

We do not believe it is. It appears to be a justification for the number division between the GCs. Rather than a reflection of the individual authorities housing needs. It also does nothing to improve the Tendring / Colchester commuting patterns. A better strategy for alleviating this would be to base new settlements, with strong employment prospects, further into the district.

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

The allocation should relate to the individual authorities needs and then a subsequently appropriate spatial strategy for that area.

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?

No, the spatial strategy options were based on the wrong figures for the plan period as discussed in question 5.

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

The best strategy proposed to date for Tendring is a combination of the metro plan, proportionate growth generated via neighbourhood plans. Beyond this plan period a number of small scale GCs and urban extensions could also be considered in Tendring and Colchester. We are less familiar with the parameters for Braintree and so do not wish to comment for that district.

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?

We will wait to comment on what the NEA think is the justification.

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

No, we do not believe so and have outlined this in our previous submissions.

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

No, we do not believe so and have outlined this in our previous submission, ref chapter 13 – Assessment of strategies. To summarize it forces the conclusion that GCs are the right strategy by not considering proportionate growth effectively and inventing high scores on a self serving set of criteria that favored GC sites.

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?

This needs to be justified by the NEAs. The distinction between fully built out evaluation and the plan period is not fully explored or rated.

**12) Does the ASA give adequate and appropriate consideration to:
(a) effects of overflying aircraft to and from Stansted airport?**

No comment

(b) impacts on operations at Andrewsfield airfield?

No comment

(c) impacts on heritage assets?

No, we refer to the CAUSE and Matthew O'Connell's submissions. Also with reference to the TBCG site Mr Phillip Robinson's submission with regard to Turnip Lodge Lane's status as a Heritage Asset Protected Lane, which received no mention in the Additional Sustainability Appraisal.

(d) impacts on water quality?

No

(e) impacts on air quality?

No, we refer to the CAUSE submission.

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?

We do not believe the reasons given are justified.

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

(a) cumulative effects on the environment; and

We believe this to be a question for the NEAs.

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

No, see HRA submission by Doc Chris Gibson on behalf of Wivenhoe Town council.