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NEA JOINT STRATEGIC (Section 1) PLAN

ADDITIONAL HEARING SESSION FOR MATTER 1

HEARING STATEMENT BY EDWARD GITTINS: CHARTERED TOWN PLANNER

Foreword

I maintain my role as an independent Planning Consultant as I am not representing or instructed by any Clients or other parties - hence the views expressed below are my own.

I have perused the additional documentation in the Evidence Base including the Monks Wood further representations together with the points identified in the Inspector's questions. I have also had sight of the first draft representations prepared by CAUSE as my concerns have been very similar in terms of the impacts arising from the scale of the proposed garden communities as well as in relation to the selection process. This has now come into sharp focus as a result of the late registration of the Monks Wood representations.

SUBMISSIONS

My representations largely focus on Inspector's questions which refer to the SA for the three garden communities, the duty to co-operate, and the site selection process. Question 2(c) is particularly apt but I believe could usefully be supplemented to apply to all strategic sites put forward for evaluation. In other words, Monks Wood needs to be assessed in the context of all the strategic sites that have been on offer irrespective of whether such sites are supported or have been rejected.

The "co-operation" that took place between authorities in terms of the selection of garden community sites appears to have been largely confined to cross border sites and not to other alternative sites. (Question 1 (a)). In other words, the NEA support for the three garden communities was the focus of the main cooperative effort whilst alternatives such as Langham

and Tendring Central (and subsequently Monks Wood) were rejected by the Local Plan Committees within the administrative area in which they happened to be situated. This situation was inherently unsatisfactory for several reasons: firstly, all strategies and garden community options were not evaluated together; secondly, there was no compelling evidence to justify or explain the variety of scales being put forward for the three main garden community contenders nor for rejecting smaller garden communities in favour of much large developments; thirdly, the Tendring Central scheme was promoted as an alternative not only to the scale of development being proposed at Weeley but also to the Tendring Colchester Borders scheme and therefore clearly had implications for Colchester as well as Tendring.

In my view, if the duty to co-operate was to be fulfilled and the interests of transparency and fairness met - as all the various potential locations and garden community sites had cross border impacts and influences, (ie: they had strategic relevance to the whole of North Essex) - decisions on strategic sites needed to be considered together and chosen by a plenary body composed of appointed representatives from the three North Essex authorities. Instead, the fate of the strategic sites which did not straddle borders was determined over time in the context of the narrower perspective of individual Districts and subject to the political and public pressures influencing their respective internal decision-making processes.

Rival sites and strategies including Monks Wood should therefore have been considered jointly by all three authorities in order to fulfil the duty to co-operate. (Question 2c). The filtering or sieving of sites nevertheless took place in geographically separate Committee rooms leaving the three main sites to be promoted jointly later to reflect the duty of co-operate. I therefore consider the selection process to have been flawed as only in the latter stages of Plan formulation has the duty to co-operate come to the fore – too late for those strategies and sites which had already been rejected.

With Monks Wood now entering the fray at this late stage, in my view this should be evaluated alongside a reconsideration of other previously rejected strategies and strategic sites and alongside the 3 garden community sites. (Question 2(d)).

This alternative process would help address the inadequacy of the selection process to date. (Question 2(e) (iii)). It would also enable it to be argued that there are better and more sustainable alternatives to Monks Wood and to the 3 selected garden community sites.

Edward Gittins

Chartered Town Planner 11th April 2018 (amended 23rd April 2018)