

ASA – hearing statement response

We are still of the view that the ASA fails to provide adequate answers to the issues raised in our hearing statements and consultation submissions including from JAM Consult and papers on Air quality, Rail Capacity, Water and Monks Wood. In some cases, the 61-page NEA hearing statement is incorrect or inconsistent¹. We are unable to address all the points in 1,500 words and will therefore reserve the majority of our comments until Examination.

We address just three points in this further statement:

- i. Housing need
- ii. The most appropriate strategy
- iii. The NEA principles set out in their hearing statement.

i. Housing need

Of particular note is the extraordinary admission, in table 1B (below), of a significant change to the housing numbers situation as of March 2019, such that even without the garden communities, two districts will build more houses than they need and Colchester is only short by 275 dwellings.

Table 1b – Residual housing requirement calculation 31st March 2019

District	Objectively assessed housing requirement 2013-2033	Actual dwelling stock increase 2013-2019	Dwellings expected 2019-2033 from existing planning permissions, Section 2 allocations and windfall sites.	Residual requirement 2019-2033 for which additional allocations are required.
Braintree	14,320	2,451	12,292	-423
Colchester	18,400	5,942	12,183	275
Tendring	11,000	2,854	8,375	-229
TOTALS	43,720	11,247	32,850	-377

Since then, Braintree District has approved an additional 379 dwellings on large sites, bringing the current residual requirement to **-802**. On this basis, what justification can there be to build publicly-funded, risky garden communities and how can this be considered an appropriate strategy, let alone the most appropriate strategy?

¹ e.g. i. Page 15, NEA hearing statement – our reference in our submission was in fact to the change in results from stage 1c to stage 2 and the fact that the positive results in stage 1c are scored down in stage 2, and ii. the NEA’s have clearly not read the CAUSE submission on Monks Wood properly because they say, in paragraph 8.4.29 that we object to its inclusion in the Stage 2 and then go on to say that they “have however followed the Inspector’s specific advice to test Monks Wood, at a scale envisaged by its promoters, in combination with other options.” Inclusion in Stage 2 has nothing to do with the Inspector’s advice – we argued that there were showstoppers that should have led to Monks Wood’s exclusion from Stage 2 and we challenged the robustness of the analysis in Stage 1.

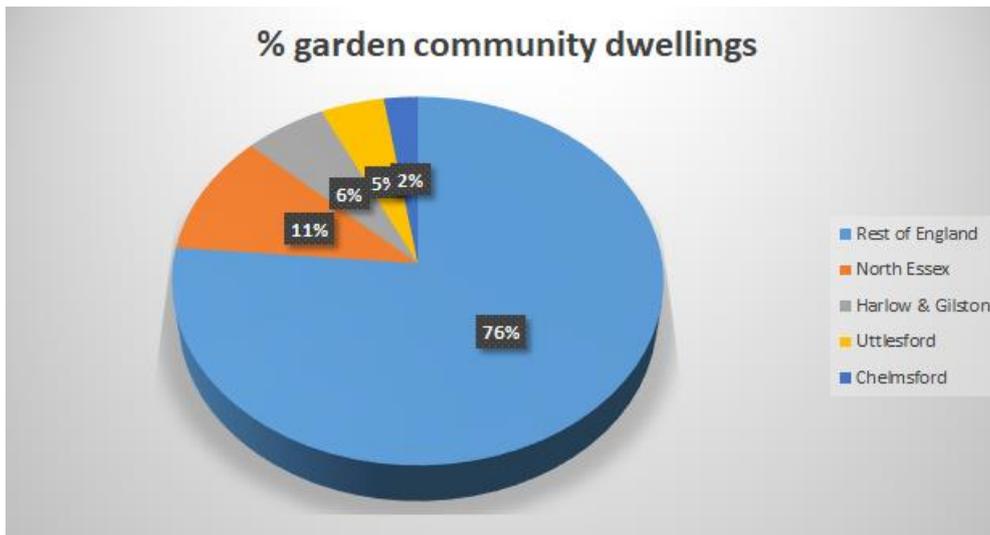
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If those revised figures were available in March 2019, why were they not used in the ASA in July 2019²? It is also unclear why the only option tested was 7,500 homes. Once again, this reinforces our point about the use of evidence (or lack of it) in the ASA.

In light of the position now being advanced by the NEA's, if the Part 1 plans are to continue then it would seem wholly sensible to remove any reference to Garden Communities. Any need for additional sites in Colchester to make up the modest 275 house shortfall over the plan period can be addressed through additional non strategic allocations in the Part2 plans, assuming that the NEA's are not being assessed as a housing market area in and of itself in which case there is already a reported over provision of housing in the plan period.

ii. The most appropriate strategy?

Data from a report by Lichfields, December 2019, 'How does your garden grow?'³, shows the extraordinary concentration of garden community housing in north Essex (and that nearly a quarter of *all* garden community housing in England is being concentrated in wider north Essex/central Essex):



The report also highlights the unique scale of what is being proposed in north Essex. The Lichfields table below shows that north Essex proposes significantly greater growth in garden communities than the second and third largest garden community proposals. The majority of the fifty studied are far smaller: average 8,000 homes and 28 under 5,000 homes. This raises the question of whether this is the most appropriate strategy for north Essex.

² CAUSE did ask LUC a question about the numbers used in the ASA but was told that the NEA would respond. As far as we aware, they did not.

³ https://lichfields.uk/media/5638/how-does-your-garden-grow_a-stock-take-on-planning-for-the-governments-garden-communities-programme.pdf



iii. NEA principles

The NEA say in their hearing statement that there are “some overarching principles to bear in mind” and we set these out below, with CAUSE’s response:

NEA principle i) The ASA has been prepared to respond directly to the Inspector’s concerns about the original Sustainability Appraisal and is, in effect, an addendum to that original work; and ii) The ASA represents a high-level appraisal of strategic options which relies on a proportionate level of evidence that is appropriate for the stage of the plan making process the NEAs have reached and that provides a reasonable level of detail to inform decision making.

We disagree that the level of evidence is appropriate, nor that it provides a reasonable level of detail to inform decision-making, for the reasons set out in our hearing statement and consultation response.

NEA principle iii) The purpose of Sustainability Appraisal (and this ASA) is to identify the potential significant environmental, social and economic effects of different options to inform the decisions of the plan-making authorities (in this case the NEAs) in determining the most appropriate strategy for growth through the Local Plan. It is not designed to determine the most appropriate strategy – that is a decision for the plan-making authorities taking a variety of factors, including the findings of the Sustainability Appraisal, into account.

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The ASA has not identified the potential significant environmental, social and economic effects of different options in a robust manner. Concerns raised by consultees about the robustness of the ASA methodology were ignored, as was the input from stakeholders who attended the workshop at the stadium.

We have seen nothing to change our minds about the concerns we have raised in our consultation about the shortcomings in:

- Evidence - The need to examine the evidence base with regard to viability, provision of transport infrastructure and employment opportunities.
- Objective Comparison - An objective comparison of individual garden community site options at a range of different sizes

In addition, questions about the degree to which the NEA have influenced the ASA, means that its conclusions cannot be relied on and independence is at doubt. This is partly demonstrated in bias towards the authorities preferred alternatives, where, for example, no general objection to the proposals are noted, while at others (Weeley, Metro Plan and Kings Dene in particular) the hearing statement references objections. This is inconsistent. Why, for example, was the widespread opposition to the NEGC proposals not raised?

NEA principle iv) Whilst a Sustainability Appraisal is required to assess reasonable alternatives in order to inform the decision making process, it is not required nor expected to assess every conceivable alternative, every potential site option or every conceivable permutation or combination of sites.

Despite the responses in the NEA hearing statement, the concerns we set out in our consultation submission and hearing statement remain: the ASA does not justify the selection of the preferred spatial strategy options for the Section 1 Plan. Nor does it set out adequate reasons for selecting/rejecting options using the updated evidence base.

The ASA has failed in its main purpose: to demonstrate the assessment of all reasonable alternatives in a comprehensive, equal and consistent manner, which is supported by the evidence base.