

# North Essex Authorities Shared Strategic (Section 1) Plan Examination Hearing Statement of CPRE Essex

## Matter 8 - Sustainability Appraisal Issues

Does the Additional Sustainability Appraisal [ASA] adequately address the shortcomings in the submitted SA that were identified in my post-hearing letter to the NEAs of 8 June 2018 [IED011]?

Does the ASA justify the selection of the preferred spatial strategy option for the Section 1 Plan?

Questions for all participants, including the NEAs.

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?

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

*As commented in the CPRE response to the ASA Method Scoping Statement, a minimum figure of 2,000 dwellings as the definition of a "strategic site" is considered far too high a threshold. Elsewhere, the definition of a "strategic site" - particularly in a predominantly rural location - would be well under this figure (ie in the hundreds). Raising the level in North Essex to 2,000 will have impacted on the methodology as it not only excludes some very large scale Section 2 allocations from this category but it also overlooks the cumulative strategic significance of smaller urban sites that are physically close and/or actually linked.*

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

*No - it is hard to give credibility to the SA, which itself finds many negative effects about large scale development on the Pattiswick Estate and yet does not dismiss Monks Wood as unsustainable and undeliverable at the first sifting. Development of this site is likely to affect a high number of sensitive receptors which are present either within the site or very near to it, including biodiversity and heritage assets, excellent or very good quality agricultural land and mineral resources. The appraisal cannot therefore be deemed to produce a reliable output if it ignores red flags such as this outstanding example.*

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

*No - the appraisal is inconclusive and appears to have been a rushed exercise in order meet a predetermined outcome. The outcome of this extra work is a subjective opinion based on the level of growth and development "likely to be necessary". Sites that can accommodate long term development are therefore automatically favoured, even though it has not yet been decided what level of development is objectively needed beyond the current plan period. The underlying fact remains that the proposed Garden Communities appear to be an attempt to allocate land based on availability rather than considering sustainable, deliverable development according to the requirements of the NPPF. The better and more favoured solution is to allow the district-level (Section 2) Local Plans to proceed and to take stock about the longer term, in a process that involves true engagement with local residents, rather than imposing unnecessary and unpopular large-scale new settlements in greenfield locations.*

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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 - the results of the analysis appear to be inconclusive. There are no obvious showstoppers, no locations seem to perform relatively better or worse across all SA objectives and most sites impact on high quality (BMV) agricultural land (and Minerals Safeguarding Areas).*

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?

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

*The SA acknowledges that the scale of the proposed development will impact on the character of North Essex. This can only be to the detriment of the countryside and the quality of life for local residents. CPRE has always suggested that the extent of housing built on greenfield sites in the open countryside should be kept to the minimum and that alternative strategies based on the "brownfield first" principle, with some hierarchical growth (including smaller settlements), along with well planned and deliverable sustainable urban extensions of modest scale should be the preferred mix. The current scenario of uncontrolled urban sprawl - without the required infrastructure or robust mechanisms for providing it - needs to be addressed urgently. However, a spatial strategy based on large stand-alone new towns in the countryside and lacking the appropriate strategic transport infrastructure is not the solution.*

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

*No - the fact that no options particularly stand out does not support the conclusion that the submitted Spatial Strategy should remain the preferred choice. The reasons for the selection/rejection should be justified by the evidence. The results do not demonstrate appropriate links to the evidence e.g. transport, viability etc. In this respect, funding of the transport infrastructure, in particular, still appears to be very aspirational and vague. The main reason that the methodology is unable to come to an outright and clear conclusion is because the flawed assessment gives almost identical results for all the options, often as a result of a lack of suitable evidence to provide a definitive result. Had suitable evidence been prepared for all options, of a comparative nature, the results would more than likely have been very different. The use of general assumptions has led to generalities in the results. Suitable information on the viability and deliverability of the different options is also lacking, despite the specific advice provided by the Inspector. The conclusion that the preferred strategy provides more certainty in terms of coherence and investment, including new transport infrastructure, services and facilities is not necessarily demonstrated by the evidence available.*

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

*The ASA fails to show how it has informed the development of the Plan and the selection, refinement and publication of the proposals - it merely suggests that the results are inconclusive. It has arguably failed in its main purpose - ie to demonstrate the objective assessment of all reasonable alternatives in a comprehensive, equal and consistent*

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*manner, which is supported by the evidence base. The ASA does not show that the chosen approach is the most appropriate given the reasonable alternatives. The seven Principles developed by the North Essex Authorities to guide the planning judgment of the selection of the reasonable spatial strategies raise questions regarding the objectivity of the assessment and shows a desire to justify pre-determined decisions rather than considering the information with an 'open mind'.*

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?

*The ASA provides an overly complicated and confusing approach, which lacks objectivity and appears to seek to justify a pre-determined strategy. The evidence base has not been updated for all sites and does not link to the assessment. It cannot, therefore, be shown to support the assumptions - in particular, the viability and transport infrastructure. The whole SA process, including the ASA, fails to demonstrate that the chosen spatial strategy is the most appropriate when considered against reasonable alternatives, as required by the tests of soundness. The ASA conclusion demonstrates that the assessment is not fit for purpose in that it has been unable to arrive at any conclusions on which strategy is the most sustainable or appropriate. Since the findings are not considered credible, justified or robust, the conclusion has to be that Section 1 Local Plan cannot be deemed "sound".*

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?

*No - the inclusion of suitable mitigation measures is clearly lacking from the ASA. The mitigation measures that are provided in the results appear vague and are not based on any actual measures or policies. The SA is heavily reliant on information provided in the Site Information Forms regarding mitigation measures, rather than the Local Plan evidence base itself. In addition, there is no summary of the mitigation measures that are needed for each site or spatial strategy option.*