

HEARING STATEMENT SUMMARY – MATTER 8 SUSTAINABILITY APPRAISAL**LOUISE AND CAROLINE RATCLIFFE OF SALING GROVE.**

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?

In summary, it is our view that the published ASA does not adequately address the shortcomings of the earlier SA and hence does not comply with the relevant requirements or national planning policy set out in the NPPF. The failure to adequately assess some aspects of the environmental impact of the GCs and other options, has perpetuated the original failing of there being over optimistic assumptions about the benefits of GCs, and correspondingly negative assumptions about the alternatives, without adequate evidence to support many of those assumptions.

The generalised assessment of constraints, such as the impact on heritage assets and the deferral of heritage impact assessment to a later stage, has consequences not just for the heritage assets themselves, which risk being adversely impacted to an unacceptable degree, but also if the heritage assets are to be adequately protected, fails to address the impact this would have on the extent, nature and spatial distribution of land uses within the proposed GCs which in turn affects their capacity, scale and overall viability.

This concern is not diminished by the suggested changes.

As such, the ASA does not justify or provide an adequate or sound evidence base for the selection of the preferred spatial strategy.

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?

It is not considered that the threshold is adequately justified and appears somewhat arbitrary.

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

Stage 1 is about the principle of development. But how can you form a view on the acceptability or otherwise of the principle of development in the GCs if the knowledge base is inadequate and you fail to accurately or even remotely assess relevant constraints and the potential impact of development? This approach is unsound and is compounded by the conflicting evidence base, which differs between and within the constituent authorities (e.g. the generic approach to rating heritage impacts between options and the differences in landscape and heritage evidence base in Uttlesford and Braintree Districts referenced in earlier submissions).

The initial stage should adequately define and set out the objectives, establish the baseline and deciding on the scope of the assessment and information requirements. The evidence base for this stage is not considered adequate for the reasons set out in our original submissions. We have provided significant information in the Heritage Impact Assessment for Saling Grove which clearly

shows that the setting of the nationally important heritage asset is much wider than the ASA and Local Plan assumed and that the registered garden and house would be adversely impacted to a degree that is both substantial and adverse. This should form part of the current evidence base and feed into the ASA at stage 1 assessment of the preferred spatial strategy. The current SA and ASA are incapable of doing so because of the flawed methodology referenced in our representations.

The SA objective for the historic environment is to conserve and enhance historic and cultural heritage and assets and townscape character. Flowing from this are the questions Will it protect and enhance designations, features and areas of historical, archaeological and cultural value in both urban and rural areas and secondly, will it have a negative impact on the significance of a designated historic environment asset or its setting? The assessment carried out for neither stage 1 or 2 can adequately answer these questions and hence the methodology fails.

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

The ASA seems to have commenced from the starting point of fixing a broken SA and doing what seemed possible in limited time. It is not therefore, objective as it has not dealt adequately with each constraint and proposed a methodology that adequately allows the relative impact to be assessed between each option. It still reads as justifying a pre-determined spatial strategy rather than considering the spatial strategy objectively and impartially.

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?

In setting out a flawed methodology, the ASA fails to give clear and justified reasons for the spatial strategy that proceeds to stage 2.

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?

The level of housing to be provided should be lower and must also reflect the level of constraints identified within the districts. In this case the proposed spatial strategy, in identifying both a quantum of development and location (West of Braintree GC) that has clear adverse impacts on nationally important heritage assets and the landscape setting.

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?

N/A

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?

The options continue with a pre-occupation with GCs and have not adequately considered the alternatives, including urban densification, sustainable urban extensions and fewer GCs in order to minimise the impact of development on undeveloped countryside and small rural communities, especially those where there are important heritage assets. Much more can be achieved by investing in the existing main towns and working with the present settlement hierarchy and spatial distribution of population.

As noted previously and in our submission, there is not adequate justification for the identification of West of Braintree as one of the preferred options. The ASA and prior to that the SA have not followed a methodology that accords with clear Government policy and have not undertaken an appropriate Heritage Impact Assessment that allows proper assessment of the potential impacts associated with the options.

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

Options that maximise investment in the existing main towns and working with the present settlement hierarchy and spatial distribution of population increases the critical mass of those settlements and enables investment to reach more people, enhancing infrastructure for all and reducing the impact on the countryside, heritage assets and environment of the rural parts of the Borough.

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?

N/A

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

No for the reasons previously stated. This must include an up to date and detailed Heritage Impact Assessment for each of the proposed GCs and overall spatial strategy. Without this, the ASA fails to meet the requirements of the relevant statutory and policy framework.

The compartmentalised nature of the ASA assessments treat historic buildings, landscape and other environmental and cultural assets as separate, which is clearly not a true reflection of the real world. People attach value to the environment, the culture, the setting and landscape of places by their spatial relationship, what separates them and what connects them. The environment of Saling Grove, for example, is as much about historical association with local villages and with the sense of a remote rural context, approached through an informal landscape setting. There is no sense of this in the disaggregated and compartmentalised structure of the ASA, which fails to get to grips with the real impact of development on heritage assets, the community and cultural value of the sense of place created.

Much of the evidence base on which the ASA is based is also compartmentalised and in some cases dated, failing to reflect adequately or at all, the true extent of constraints. The charter and principles of the GCs are well structured, but if imposed on communities and heritage assets without

regard to the cultural and historic connections and context, fail to respect the original principles of new GCs.

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

As noted above, the ASA seems to have commenced from the starting point of fixing a broken SA and doing what seemed possible in limited time.

It is not therefore, objective as it has not dealt adequately with each constraint and proposed a methodology that adequately allows the relative impact to be assessed between each option. It still reads as justifying a pre-determined spatial strategy rather than considering the spatial strategy objectively and impartially.

It has not provided any new information or objective analysis that allows the decision maker to assess the heritage impacts of development or the relationship of this with landscape and setting. It has failed to include HIA as required under national policy. In deferring to another stage, the ASA and Local Plan process risk restricting the options without adequate regard for the consequences and this will risk unacceptable impacts and/or threaten delivery, spatial distribution of growth, the scale and nature of development and overall viability.

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?

The assessment only covers that element of development that is within the plan period and fails to assess the likely long term consequences of development, which by definition is likely to continue well beyond the plan period. Indeed such development is necessary for the viability and infrastructure to be justified, yet the consequences of that total overall level of growth is not assessed. This cannot be sound.

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

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

No for reasons set out by others.

(b) impacts on operations at Andrewsfield airfield?

No. Our submission and others highlight the significance of Andrews Airfield and the failure to adequately protect its heritage or its functional and cultural associations or to the landscape context that forms part of Great Saling, Bardfield Saling and the other communities and listed farmsteads.

(c) impacts on heritage assets?

Our representations clearly set out the failings in the methodology for the assessment of the impact on heritage assets. There is no real evidence or justification provided and the approach fails to meet the required methodology or policies of the NPPF and Historic England guidance. As the decision at the Local Plan stage is about the principle of development, adequate information is required of a clear and specific nature to be able to determine the impact of development on nationally important heritage assets in accordance with paragraphs 193-196 of the NPPF. The ASA does not provide this and neither does any of the evidence base documents.

(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?

No for the reasons stated above and in our original representations.

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 for the reasons set out in our original representations.