

MATTER 8:

SUSTAINABILITY APPRAISAL

**North Essex Authorities Shared Strategic (Section 1) Plan –
Further Hearing Sessions**

**SUBMITTED ON BEHALF OF L&Q, CIRRUS LAND LIMITED, AND
GATEWAY 120**

December 2019

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 Q1(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?.....6

 Q5) 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??6

 Q11) 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?7

1 INTRODUCTION

- 1.1 This statement has been prepared on behalf of L&Q, Cirrus Land Limited, and Gateway 120, who together form the West Tey Partners behind the majority landholdings within the Colchester Braintree Borders Garden Community (CBBGC).
- 1.2 This Statement is made following the re-opening of the Examination into the North Essex Authorities ('NEAs' or 'the Councils') Shared Strategic (Section 1) Plan. We note and approve of the scope of examination hearings as detailed by yourself in the 'Matters, Issues and Questions'. This Statement covers those questions posed within Matter 8 – Sustainability Appraisal.
- 1.3 The West Tey Partners have been active participants throughout the Examination of the Section 1 Plan, working with the NEAs where appropriate to demonstrate the deliverability of CBBGC in line with the principles established by the North Essex Garden Community Charter, reflected in draft policy, and echoed throughout our promotion of the site.
- 1.4 In promoting West Tey, we appreciate that this land does not comprise the entirety of the 'Area of Search' included within the Plan for a new garden community. Furthermore, whilst our capacity study work has shown land being promoted capable of accommodating approximately 17,000 homes as part of a comprehensive new community in line with the principles set by the NEAs, it does not amount to the full 24,000 homes stated as the top-end of draft policy.
- 1.5 Accordingly, what we are promoting has, in places, differences to that put forward by the NEAs. Despite this, it remains true that the proposals promoted by the West Tey Partners would deliver a garden community within the development parameters, and to the quality of that sort in draft policy.
- 1.6 Where amendments have been proposed to policy, this is to ensure accordance with national policy and provide sufficient comfort that should critical infrastructure not be delivered, the proposed garden community remains to a sustainable scale.
- 1.7 We continue to work productively with the NEAs and NEGC Ltd to bring forward a new garden community at West Tey.

2 SUSTAINABILITY APPRAISAL

- 2.1 The legal principle that deficiencies in SA may be rectified, or “cured”, by later SA work is supported and well established. In this light, we support the Inspector in guiding the NEAs through the Additional Sustainability Appraisal (ASA) work.
- 2.2 The Additional SA work now presented represents a marked improvement from the Place Services June 2017 Draft SA. The SA process remains one up until the point of adoption of the Local Plan. Whilst we believe the additional work undertaken in the ASA addresses the deficiencies identified by the Inspector and is considered to sufficiently cure these errors, the opportunity remains for the NEAs to further supplement this to rectify any further identified shortcomings.

Q1(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?

- 2.3 We note the Inspector’s previous acceptability of 5,000 dwellings as a threshold in the SA work undertaken up to the original EiP hearings. The ASA has since lowered this threshold to 2,000 dwellings, stating that at this threshold garden city principles can be achieved. We do not question this assumption and support the methodology in robustly testing a wide range of additional sites and scenarios as a result of this amended methodology.
- 2.4 The result of this change is not to the exclusion of any sites in particular. The ASA is clear that any sites below the 2,000 threshold has been considered as part of the Section 2 Local Plan processes. Indeed, it is logical that the Section 2 Plans deals with sites that are fully deliverable within the Plan period, whilst the Section 1 Plans provide the platform for sites that can deliver not just within the Plan period but far beyond this.
- 2.5 It has been demonstrated that sites considered in the ASA can deliver in excess of 2,000 dwellings in the Plan period, whether as part of a larger development or standalone at that scale.

Q5) 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??

- 2.6 It is important for the tested spatial strategies to be capable of meeting, as a minimum the residual requirement for the Housing Market Area i.e. 2,000 dwellings. However, we support the approach of the NEAs in seeking a buffer to this need. The submitted Section 1 Plan sought to allocate 7,500

dwellings which would equate to a robust buffer of some 12.5% against the assessed needs of the Plan area. The Suggested Amendments to the Plan would reduce this down to circa 9%¹.

- 2.7 It is appreciated that the residual figure of 2,000 dwellings factors in a large number of proposed allocations within Section 2 Plans that are yet to have their deliverability tested at Examination. Accordingly, the 2,000 figure should be treated as an absolute minimum to ensure the housing needs of the Plan period are to be met and the Section 1 Plans provide a sound basis from which the Section 2 Plans can be examined. We support the use of a higher figure that reflects a buffer against need.
- 2.8 In this way the ASA is sound in its setting of seven principles from which spatial strategy alternatives were chosen, including the need to meet the housing needs of the Plan area within the Plan period.

Q11) 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?

- 2.9 The ASA is robust in appraising the Spatial Strategies both within the Plan period and fully built-out. The Examination of the soundness of the Section 1 Plan requires the Inspector to be comfortable on the deliverability over the Plan period, with policy then setting the platform for the future development after this.
- 2.10 In accounting for both scenarios the ASA ensures that an informed decision can be formed to deliver a spatial strategy that best meets of the NEAs in the short, medium and long terms.

¹ Appreciating the Delivery Partners have demonstrated that more than this could be delivered in the Plan period and the prior figure of 7,500 dwellings would be more reflective of actual future delivery.