

Matter 8 Hearings Statement on behalf of the Wivenhoe Society

Q1(a),(b) There is no clear definition of what is meant by strategic. Strategic could mean that it involves cross border issues, that it involved strategic infrastructure, such as road improvements which are important to a wider area, that it involves strategic decisions about where long term growth, both housing and **employment** should best be focussed in the long term in the NEA. A decision as to whether growth should be focussed on new developments or on expansion of existing settlements could also be considered strategic.

For the purpose of stage 1 the criterion has been adopted that any new housing development of 2,000 plus dwellings counts as strategic whether this is a free standing new development or an extension to an existing community. This seems an arbitrary number. It could be argued that 1,400 is the number required to support a two form entry primary school. It could also be argued that the threshold should be lower for extensions to existing settlements if these already have appropriate infrastructure which could be improved/extended.

Q2 The Stage 1 evidence base is lacking in certain respects. In table 2.7 of the main report one of the key questions posed for objective 8 is “Does it seek to minimise congestion at key destinations / areas that witness a large amount of vehicle movements at peak times?” While in the background information a map of bus stops is given there is nothing relating to existing road congestion and travel unreliability. Essex Highways certainly has this information for the Colchester area and most likely for the NE area as a whole. This is relevant information which should have been considered. This is of relevance to the Tendring Colchester Borders site as the adjacent stretch of the A133 is the most congested route in the Colchester area. There is no reference to the earlier Rignway Jacobs studies on traffic flows.

For objective 6 a key question is “will development have a potential impact on a national, international or European designated site (SPA, SAC, Ramsar, SSSI)?” The assumptions for scoring under this heading appear inadequate for European protected sites. Given the potential for recreational disturbance the distance of proposed development from such sites should be recorded. The Zones of Influence for such sites is extensive. However the nearer a development is to a site the greater the potential for impact.

There are various appraisal questions in table 2.1 setting out the objectives of the SA framework which do not seem to be addressed. Amongst these are under objective 5

- Will it tackle employment associated deprivation?
- Will it enhance the area’s potential for tourism
- Will it promote development of the ports?
- Will it encourage the rural economy and diversification of it?

Nor does there is there any explicit consideration of settlement coalescence under objective 14.

Q3 Relative to the key questions asked, the Stage 1 appears to have been impartially conducted but the choice of appraisal questions is open to criticism.

Q4 The reasons given for ruling out Weeley Villate are not adequate. These are that the land is in multiple ownership with the landowners have no interest in developing a comprehensive scheme, and that Tendring had considered major development as part of its part 2 allocations. Is there evidence for the first point? It is only relevant if a developer led model is followed rather than a small scale garden community approach is used. On the second point was it not the case that Tendring DC considered large scale development at Weeley to be a strategic matter and so a Part 1 matter? Weeley has the merit that it has a railway station unlike the other options carried forward to the East of Colchester (with the exception of the Metro Plan. The Metro Plan is carried forward but the case for Weeley on its own. Given that it has relatively good road links it should be assessed in its own right. It is also more central to Tendring than the favoured Colchester Borders Garden Community, would look to Clacton for some services and would potentially benefit the relatively depressed parts of the Tendring economy. It also would use land of lower agricultural value than the other alternatives to the East of Colchester

Q5 This issue is discussed in paragraphs 1.2 and 1.3 of the Wivenhoe Society's response. The suggested 7,500 figure (which was the number originally proposed for the three Garden Communities) would seem to have been over taken by events and justifying it by a need for a buffer stock would seem to be biasing the SA in favour of the Garden Communities and is possibly relevant to issue 10. The proposal to provide sites for 5,500 more dwellings than required to meet the OAN is justified in appendix 6 by saying it provides a healthy flexibility buffer of around 13%. However around 11,000 homes had been built by 2018 (and presumably more if 2019 completions are included). Any flexibility provision should be based on dwellings not yet delivered and the size of any flexibility buffer should be justified. Given that all the site comparisons in part 2 of the SA assume that the selected sites must between them provide 7,500 homes by 2033 this is a highly critical issue. It would be helpful if the LAs could produce up to date figures on dwellings already completed and on the windfall position. The suggested amendment to the Draft Plan includes provision for an appropriate flexibility buffer but does not specify what this should be and in any case it relates to the five year housing supply, not the Plan period as a whole. It does not seem appropriate for the SA to arbitrarily specify buffer requirements.

Q6 The 2:1 ratio for residual housing needs to the West of Colchester and to the East of Colchester happens to be the ratio of Garden Community housing to the West and East as originally proposed. Given that Tendring appears to have sufficient sites already to meet its housing needs this ratio is suspect. The relevance of commuting patterns is not obvious. The 2011 Census showed a net outflow of from Tendring of 10,647, primarily to Colchester. This might be an argument for locating a new community with a strong employment element in Tendring but the suggested Garden Community on the border, which is effectively an extension of Colchester, would do little to reduce commuter travelling distances for existing residents.

Allocating residual housing according to the shortfall against OAN for the three authorities individually would seem more appropriate.

Q7 The selection of the Stage 2 of strategic sites is predicated on the assumptions that they must be of accommodate at least 2,000 dwellings (with the exception of proportionate growth) and that the eventual total choice must accommodate 7,500 up to 2033. Given the total residual housing need is only 2,000 for the three authorities combined it is not clear that any strategic sites are necessary within the Plan period. Just one site of size 2,000 would satisfy the total NEA requirements but would not allow for a spread across the combined authorities, if this is thought desirable. Constraining the combinations of sites to be considered to total 7,500, with roughly 5,009 to the West and 2,500 to the East, needs justifying. Guessing at 2019 housing completions and assuming a 5% flexibility buffer for houses yet to be delivered would give a total requirement of around 3,500 dwelling for the period up to 2033. There are various strategies that could satisfy this. For example one of the sites at Marks Tey could provide 2,000 with the remainder at or near existing settlements, say an extra 750 at Weeley and 750 at Kelvedon (This particular combination chosen because all have rail links)

Q 8 The assessment of proportionate growth is inadequate and the spatial option of growth at suitably chosen existing settlements is not adequately explored. Settlements should be assessed according to existing provisions of community facilities and their potential for improvement, location relative to road and rail networks, bus services and potential for increased frequency, accessibility of employment locations, environmental constraints. Growth at suitable settlements would not necessarily be proportionate to their current size. The potential benefits of extra facilities and improved transport services for these communities should also be assessed.

Q 9 The evidence base for the assessments in stage 1c and stage 2 is inadequate. This is discussed in response to Q2.

Q10 The Stage 2 appraisal does not seem to have been carried out with objectivity and impartiality but seems designed to lead to support for the three garden communities originally proposed, partly by requiring that provision is made for 7,500 dwellings. Some of the assessment scores seem based on wishful thinking (for example that building the Tendring Colchester Borders garden community would have positive effects on traffic congestion). The choice of the two proportionate growth strategies considered would seem designed to produce poor assessment scores.

Q11 The assessment scores (at least for sites to the East) seem to vary little between the end of Plan period and fully built out. The environmental impacts and impacts on congestion are likely to increase as the number of swellings increases.

Q12 no comment

Q13 Section 4 of the Wivenhoe Society response discusses this at some length for sites to the East and considers that the chosen option is not adequately justified.

Q14 Material relevant to this is included in the Hearing Statement on Habitat Regulations Assessment.

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