

Wivenhoe Town Council – Matter 8

Hearing Statements Response to NEAs hearing statement:-

Question 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?

Reference – 8.4.23 (Site VE4 Weeley Garden Village) The NEAs confirm that the larger strategic site at Weeley was removed from the plan because of local objection. If this is a legitimate reason to remove sites, then TCBGC should be disqualified immediately. If TDC had attempted to engage or consult outside of their boundary with those most directly affected by the plan at TCBGC, or indeed taken any notice of the overwhelming negative responses to all public consultation conducted then they by their own standards would have to reject this site. It's incredulous that political pressure has interfered with the site selection process. This reason has never been publicly admitted before, although it is now clear it has always been a factor in site selection. Therefore, the rationale for site selection can't be claimed to be either clear or justified.

Reference – 8.4.25 Here the NEAs report a 'limited appetite (for developers) to work together', suggesting that this would hamper delivery. However, currently the delivery model for GCs is via NEGC and the use of CPOs. This should then be coupled with the level of speculative development in Tendring as testament to the appetite of developers to work in the area.

Question 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?**

Reference - 8.5.3 explains that even as early as 2017 there has been an over allocation of 6%. This has never been made clear to either councillors or the public. Table 1b – Residual housing requirement calculation 31st March 2019 – contains the somewhat alarming figures that confirm that over the three areas and this shared plan there is a negative need of 377 homes, yet we propose to deliver 7,500! The Colchester need of + 275 in number can easily be met from a single year of windfall sites, as the Borough average is 260 homes. Additionally, as a large number of the homes have already been built and because there has never been a democratic decision to include a buffer, we cannot see the justification for it.

Reference – 8.5.11 here the NEAs list a number of reasons why the buffer is necessary.

They firstly claim it is because of the fluctuation in the housing supply. However, the reality is that Tendring and Braintree are exposed because they don't have a local plan and the supply can only be controlled once one is in place. Also, if this argument was valued, why are they so confident that this 'fluctuation' will not affect the build out rates proposed?

Secondly, they state that some of the 2 section sites may not be delivered. We remain cynical that this is due to councillors that are willing to support the garden communities, but are also actively

campaigning to stop development on other section 2 sites. Again, political pressure is influencing independent planning judgement. There are also a number of site promoters that have been turned away because their sites did not meet the 2000 threshold that could have provided a buffer. The evidence now also confirms that these smaller sites would be far more appropriate in scale to meet our housing need.

Reference - 8.5.13 claims a 16% flexibility is needed. However, this has never been discussed let alone agreed by the CBC local plan committee. We are unaware of any legal requirement to include a buffer in a local plan. We also need not agree with the defence of it.

Reference - 8.5.14 states a need for a 20% buffer within the 5 year supply, even though this is not relevant in context of the local plan needing a buffer. Furthermore, is not justified for CBC that has never had to have this percentage applied.