

Wivenhoe Society

Matter 8 Hearing Statements Response comments

These comments relate to the NEA Further Hearing Statement in response to the Inspector's questions.

Question 3

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

The NEA refers (page 19) to the Wivenhoe Society consultation response relating to SA7. In our view the implications for traffic congestion were not adequately assessed either at Stage 1 or Stage 2. The NEA response is that in table Table 3.9 of the ASA Report the site NEAGC3 receives an uncertain minor negative score (-?) for longer journeys, which is recorded under SA7 (Sustainable travel). However in Stage 2 of the ASA table 4.3 records ++?/+? for shorter journeys and longer journeys respectively for NEAGC3 (East 3). Table 1.31 in Appendix 7 gives the same scorings for the fully built out scenario. The implication must be that the Link Road and the RT system will divert so much of the existing traffic that this will be sufficient to more than offset trips generated on the A133 by the additional housing and employment sites. The recently posted document EXD071 shows that Clingoe Hill (the stretch of the A133 adjacent to NEAGCS) had the highest daily traffic flow of any route into Colchester, that it has the highest AM peak traffic and that it has a delay indicator of 2+ for both AM and PM peak journeys. Evidence that congestion will not be increased by the proposed GC is needed.

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?

8.4,23 to 8.4,27 (Weeley Garden Village): The NEA response outlines why only one site at Weeley is included in the Part 2 allocations of the Tendring Local Plan but this is based on the premise that housing would be included in the Tendring/Colchester borders Garden Community in order to meet the housing targets. It is not an explanation as to why it was excluded from Stage 2 in the new ASA which is intended to evaluate impartially all reasonable spatial alternatives. Given the possibility of compulsory purchase for garden communities/garden villages the fact that landowners have not formed a consortium does not seem an adequate reasons for ruling Weeley out as a suitable location. For information the Wivenhoe Society did not in its response advance the Metro Plan as the most sustainable option. It considered that growth should be focussed at Weeley, which is relatively well connected to major roads and where sites have been put forward by landowners. Growth at the other locations on the Clacton Line should be assessed as part of a more adequate assessment of a strategy of growth at suitably selected existing settlements.

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?

The NEA opt for the provision of land for 7,500 new dwellings. This they state represents a 16% flexibility margin. However some of the dwellings have already been built so there is no need to provide a buffer for non delivery of these. Any flexibility margin should relate to dwellings yet to be delivered. Table 1.b gives the position for March 2019. This shows that 11,247 dwellings have already been completed. Since March additional houses will have been built. On the assumption that delivery rates in 2019 were the same as the average over the previous years a guestimate for the position at the end of 2019 is that 12,597 homes will already have been delivered, implying an additional 31,123 dwellings are needed to meet the 43,720 target for the period 2013 to 2033. An additional buffer of 7,500 represents a 24% flexibility margin. Even using the more conservative figure of 11,247 given in table 1b, a buffer of 7,500 would still represent a 23% buffer. Is there evidence that approaching a quarter of allocated and windfall sites might not be delivered during the Plan Period?

Table 1.b shows an over allocation of 377 for the plan period without the Garden Communities. This is the position in March 2019. It would be useful to know if further windfalls occurred in the remainder of 2019.

The updated trajectories for the Garden Communities show a reduction in the proposed number of dwellings up to 2033 with the new targets being 6,550. Adding the 327 excess to this number would give a flexibility buffer of 6,927. This is lower than the 7,500 figure supported by the NEA. As a percentage of houses yet to be built this is 22% which still seems excessively high.

Question 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?

Comment on NEA response paragraph 8.6,5

The following statement is made

“Without expansion into Tendring, Colchester would need to meet the vast majority of its future needs through developments to the west and therefore not fully addressing needs that might arise from households being generated on the eastern side of the town.”

The logic of this is not clear. Is the argument that new households arising from population growth may want to live close to their family/friends? Why do similar arguments not apply to the north and south of Colchester? If the aim is that development should be close to existing

settlements to preserve family networks why does the Plan propose growth for Tendring in the Garden Community that is about as far from existing Tendring settlements as it can be?