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**TENDRING LOCAL PLAN:
SECTION 2 – EXAMINATION**

MATTER 2: SPATIAL STRATEGY

Question 2.6

Statement by Edward Gittins FRTPI

Date: 23rd February 2021

Have the site allocations for development in the plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

Submissions

1. The colour bar-code methodology of sustainability-appraising each individual site as set out in the Section 2 Sustainability Appraisal (SDTDC/019) (SA) is a familiar one but has certain deficiencies:-
2. Firstly, it is based on a pre-determined Settlement Hierarchy which classifies each settlement according to its existing function without taking appropriate account of the proximity and accessibility of each settlement to higher tier services, transport corridors or public transport. If these are factored into a sustainability appraisal they would produce a somewhat different Settlement Hierarchy and a different pattern for the future distribution of growth.
3. Secondly, the sheer extent and complexity of the resultant findings and determining the relative weight to be afforded the performance of individual settlements and site attributes ultimately contribute to an arbitrary process. An alternative approach would be to produce short statements in the form of a reasoned response to each site's performance in relation to the Plan Objectives, Spatial Strategy and Settlement Hierarchy.
4. Thirdly, it is not always clear exactly what is being assessed. To cite just one example, in the case of the Rural Service Centres (SA Appendix 2: Tables 80-87), one criterion involves their assessment in relation to "Public Transport" - obviously an important consideration in order to deliver sustainable growth. One aim tested is entitled:"4. Minimise transport growth whilst capturing the economic benefits of international gateways". The precise logic of this specific combination of issues - "minimising transport growth" on the one hand and "the economic benefits of international gateways" on the other - is not clear, the more so in the context of Rural Service Centres, many of which have no geographical or functional relationship with "international gateways". What exactly is being assessed here is unclear in terms of the settlements themselves and their individual sites. Yet each of the 7 Rural Service Centres and sites are assessed - and all emerge with flying colours - or rather "colour" - in this case green.
5. How Rural Service Centres and sites are deemed to perform well in relation to "Rural Transport" therefore remains something of a mystery. Indeed, three of the 7 Rural Service Centres in the Settlement Hierarchy do not have rail stations (Elmstead Market, Little Clacton and St. Osyth) whilst three of the 18 lower tier Smaller Rural Settlements do (Thorpe Station & Maltings, Weeley Heath and Wrabness), with a further three having former stations which could possibly be re-opened (Ardleigh, Bradfield and Thorrington). No sites in any of the Smaller Rural Settlements are appraised. More surprisingly, however, whilst there are undoubtedly many good arguments for directing growth towards Rural Service Centres, as noted again later, such settlements hardly feature at all in the site

allocations in Table LP2 (pages 114 - 116). Housing symbols are nevertheless shown on the Key Diagram for the Key Service Centres of Great Bentley, Little Clacton and Weeley but not for Alresford, Elmstead Market, St.Osyth or Thorpe-le-Soken. The manner in which the Spatial Strategy and Settlement Hierarchy influences the location of housing growth is therefore difficult to understand and appears to be more "site-influenced" than "settlement-influenced".

6. It is therefore not readily apparent how Public Transport (or other factors for that matter) influence the Settlement Hierarchy and site allocations or whether or not certain of the Smaller Rural Settlements and sites might perform equally as well if not better than some of the Rural Service Centres. This amply demonstrates that even if the SA's assessment of settlements and sites is robust and objective, (which I do not believe it is), the outcomes will be compromised if the Spatial Strategy and Settlement Hierarchy are not formulated to encourage sustainable transport and connections to higher tier services.
7. The significance of a robust assessment of "Public Transport" as a criterion for selecting preferred allocations cannot be overstated as it is relevant to all the settlements in the Settlement Hierarchy assessed in the SA as well as those that are not - and hence directly affects the Spatial Strategy itself. Indeed, the assessment of sites in relation to Public Transport is key to successfully addressing the Environmental Characteristics and Objectives of the Plan - as the SA (SDTDC/019 - page 41) recognises:-

"Rural Transport: A plan-led approach to allocating sites for development enables rural transport issues to be taken fully into account and improved where possible through enhancements to such infrastructure."

"Jobs: The links between homes and jobs is a key tenet of sustainability, as is ensuring progressive growth in employment opportunities across a range of sectors and in sustainable locations."

8. It is nevertheless difficult to appreciate how the colour bar-coding methodology in the SA reflects the above Environmental Characteristics and Objectives in terms of the future location of homes and jobs and the promotion of public transport. Broadening this to the Plan as a whole and in similar vein, paragraph 3.2.1 states:-

"The Settlement Hierarchy prioritises locations with access to the strategic road network, public transport and which have the potential to offer the widest range of services."

9. Even if it is assumed that that represents an accurate portrayal of the Settlement Hierarchy, the Plan does not contain any Table showing how the housing allocations and capacities listed in the Plan's Table LP2 (page 114) are distributed within the Settlement Hierarchy. Furthermore, even a cursory perusal of Table LP2 reveals that there is a dearth of allocated sites of 10 or more dwellings outside the towns and this fact alone shows the limited

influence of the strategic road and rail network in the formulation of the Settlement Hierarchy and the location of future growth.

10. In justifying its Settlement Hierarchy, the Council state on page 80 of the SA under "Alternatives Considered":-

"It is felt that the hierarchy reflects existing settlement size and proportionate growth across them. For this reason, no other alternatives have been considered reasonable for introduction at this stage."

11. The text then singles out the concept of an "Expanded Settlement" at Weeley but no other alternative strategies are regarded as worthy of assessment. The quotation above nevertheless confirms that the whole basis of the Settlement Strategy reflects "settlement size and proportionate growth across them". Whilst it is clear that settlement size is the main determinant, it cannot be said that proportionate growth is reflected in the Site Allocations. More importantly, there is no evidence that "proportionate growth" is likely to achieve the most sustainable growth strategy, whilst alternative strategies which see merit in directing growth closer to the main urban centres or within transport corridors - such as that depicted in my attached Key Diagram (Annex EGA1) - have been brushed aside.

12. The ability or otherwise of the Settlement Hierarchy and site selection methodology in achieving sustainable development must also be seen in the context that Tendring currently generates mass westbound commuting trips daily yet has chosen to focus major housing and employment growth on the western extremity of its District in a location without direct access to rail travel. This has profound implications for future travel within and across the peninsula - particularly for private traffic movements which will not be mitigated by the proposed mass transit bus links within Colchester itself. Large scale growth on the western edge of the District will inevitably increase rather than decrease travel movements across the District unless counter measures are taken to provide alternative foci for growth and sustainable modes of travel. That is a key issue which is inadequately addressed by the Section 2 Plan. One needs to be assured that the Plan's proposals for growth focus on sustainable locations and are accompanied by measures to off-set the unsustainable aspects of strategic growth in the extreme west. Neither the Settlement Hierarchy nor the Key Diagram offer comfort that these imperatives are appreciated.

13. With economically more dynamic and growing areas to the west, it is even more vital for the Spatial Strategy to place great emphasis on public transport and this requires a more targeted consideration of the potential for modal transfer from private to public modes of travel than found in the Plan's evidence base and proposals. This should be a key formative influence on the location of preferred allocations. It places an even greater necessity for housing, employment and community services to be located where they have easy and/or improved access to public transport whilst enabling growth to contribute to making the District and its individual settlements more self-contained.

14. Are these fundamental considerations for achieving sustainable development adequately reflected in the form of a Spatial Strategy and associated site selection process? In my view, they are not. The Settlement Hierarchy which influences site selection, indeed the site allocations themselves, do not reflect the key role that settlements closest to the main urban centres and within transport corridors can and should play in terms of their accessibility and potential for use of public transport and hence their ability to locate sustainable development.
15. It is not straying too far from the question posed to point out that part of the problem now identified with the site selection process stems from the production of the Section 2 Plan in tandem with Stage 1. The ill-fated original Section 1 SA was superseded by a new SA which re-looked at alternative spatial strategies including a new smaller Garden Community at Frating (Tendring Central) and, at the Inspector's specific request, the so-called Metroplan involving a necklace of growth points along the Colchester - Clacton railway line. This second SA found these proposals to represent a credible alternative spatial strategy for Tendring and to be of equal merit to the Colchester-Tendring Borders Garden Community in terms of their sustainability. There was nothing to choose between them. However, the die had already been cast in relation to non-strategic allocations and this has denied the opportunity to revisit the possible contribution those settlements and sites deemed highly sustainable in the Section 1 SA, such as Tendring Central and the Metroplan villages, might make to the Spatial Strategy and to the choice of site allocations.

Conclusion

16. In my earlier paper on Matter 2 as well as above, I allege that the Plan's Spatial Strategy and Settlement Hierarchy does not adequately reflect the need to focus growth close to the main centres and transport corridors where accessibility to higher tier services and public transport links could be utilised and improved more effectively. If the Spatial Strategy and its expression via the Settlement Hierarchy is deficient by not attributing sufficient weight to these key factors in the pursuit of sustainable development - the value of the site selection process is itself diminished - potentially fatally as far as the delivery of sustainable development is concerned.
17. Regrettably, the site appraisal and site selection process adopted in the formulation of the Section 2 Local Plan is not only flawed but is also based on a Spatial Strategy and Settlement Hierarchy which will not secure the sustainable pattern of development the Plan aspires to deliver.

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AN ALTERNATIVE GROWTH STRATEGY FOR NORTH ESSEX

Annex EGA1

