

Publication Draft Local Plan - Section 1

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| Does it comply with the Duty to Co-operate? | No |
| Do you consider the Local Plan is Sound? | No |
| Please specify on what grounds you do not consider the Local Plan is sound | <ul style="list-style-type: none"> . Positively Prepared . Justified . Effective . Consistant with National Policy |

Please enter your full representation here

SERCLE's Objection to Section SP10 in Part One of Braintree District Council's Local Plan

Paragraph 182 of the NPPF states that for a local plan to be considered "sound" it should be "Positively Prepared, Justified, Effective and Consistent with National Policy".

SP10, West of Braintree fails on all counts.

Positively Prepared

A positively prepared plan "should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development"

Though Braintree DC has clearly attempted to create a thorough and positive plan in conjunction with some of the other councils involved in the North Essex Garden Communities, the proposals put forward

in the latest AECOM report¹, together with the Hyas Viability Assessment² have major flaws in their methodology and are not viable. They:

Fail to properly quantify the **infrastructure** requirements arising from such a large development. An assumption is made that a new community can be dropped onto a remote, greenfield site and developed from scratch. That is misguided at best and disingenuous at worst;

Overstate the ability of a new greenfield development to generate employment;

Underestimate the complexity of delivering infrastructure within a reasonable timeframe given the myriad external dependencies upon which it relies, *inter alia* utilities providers including water, waste, electricity, gas and telecoms/ broadband; highways; education services and health services;

Are not properly costed, failing to properly take into account the cost of land and the third party investment required which will not be under the control of the Local Development Vehicles;

Do not lay out a **sustainable** plan in any way. The plans do not fulfil guidelines for environmental sustainability (see section on National Planning Policy below) and do not provide a proper assessment of the financial risks. The financial risks attached to this project are heightened given i) the sheer scale of the development considered combined with; ii) the extremely long timeline for delivery; and iii) the chosen delivery mechanism (Local Development Vehicles or LDVs) of shifting the risk to the public sector and therefore onto council tax payers across the county (funding is assumed to be provided 50:50 by BDC and Essex County Council):

The viability assessment (which is not even based on one of the 3 options put forward for discussion by AECOM) does not provide an assessment of the peak debt requirement of the project. Previous iterations of Hyas' model³ included an upfront land purchase and therefore a peak debt requirement (approx. £150 million in the case of WoB); the latest plan assumes that land will be purchased over the entire 50 year plan, allowing for a 2 year development and infrastructure construction before being sold onto developers in parcels;

The staggered purchase model, whilst attractive from a funding and cash-flow perspective, is unrealistic when viewed from the point of view of the landowners, who would effectively be writing a 50 year option with little or no upfront premium, assuming the risk that the whole project became a "white elephant". A deeper analysis of the real returns for the future generations of those landowners suggest that this approach is far from attractive and it is unclear why they would accept it;

Assuming a more realistic land purchase scenario where land is purchased upfront it is estimated, based on the latest

Hyas assumptions, that the peak debt, even based on Hyas and AECOM's unrealistic and under-costed business plan, is around **£190 million and only repays after 35 years**;

Even minor changes to the assumptions, however, render the project loss making and insolvent. Given the upfront cost of the land and the associated financing costs, the cash flows are materially exposed to delays and cost overruns in that scenario:

Increasing the assumed interest rate by 1pc from 6% to 7% increases the peak debt to more than **£215 million and the debt does not repay** in the 50 year horizon of the project – in fact, at the point at which the project stops generating revenue, the project still has debt (i.e. it is **insolvent**);

Including a more appropriate contingency than the 5% assumed by Hyas (bearing in mind that large infrastructure projects generally build in a 30-40% contingency at this stage of gestation) produces an even more extreme financial outcome – at 30%, the bottom end of a reasonable contingency amount, peak debt has reached more than **£1 billion by year 50 and is still rising**.

THE FINANCIAL RISK TO THE TAXPAYER OF THIS SCHEME IS WHOLLY UNACCEPTABLE

Other risks not raised in any of the publicly available documents which arise from the proposed delivery mechanism include:

Financial slowdowns or recessions which lead to a pull-back in development by commercial developers who will be the buyers of the land parcels. Commercial housing development is by its nature cyclical, and there is no reason to believe that that would change in the future;

Failure of developers, who will have a multitude of opportunities to invest if even a small proportion of the proposed New Town come to fruition, to buy into the master plan, either at all or at the prices assumed in the plan, leading to a reduction in land sale proceeds;

Risk of home buyers not wishing to purchase a home within close vicinity of a working gravel pit where digging has not yet even started, thus making the site less attractive to developers and reducing land proceeds to the LDV;

Political risk - regime change at a local, district, regional and national level which leads to changes in housing policy such as increased affordable housing requirements, which are a cost to the LDVs;

A slowdown in the rate of housing demand due to regional or macro issues such as net migration to the area;

At no point has an assessment of ***unmet requirements from neighbouring authorities***

been discussed at all. This is unsurprising given that the plans as presented do not even meet the infrastructure requirements of a sustainable West of Braintree, never mind other neighbouring authorities.

Justified

In order to be "justified", a *"plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence"*.

Beyond any doubt, West of Braintree is not justified:

The District council has not sufficiently considered or evaluated alternatives, particularly those which use brownfield sites – see NPPF section below;

Taking the approach of asking land owners to provide potential sites, which it will then purchase from them at values far higher than current open market value, transferring the development risk into the public sector, is wholly flawed. BDC has put forward the "least worst option" with the most straightforward land ownership structure based on sites put forward through the Call for Sites process, rather than seeking out appropriate brownfield and greenfield sites which are strategically located in a way which effectively utilises existing road, rail and other infrastructure.

Effective

In order to be "effective", a *"plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities"*

Again, West of Braintree falls short on this criterion for many of the reasons laid out above as well as:

The infrastructure plan, as well as not delivering a strategic transport solution, has many dependencies which could delay implementation, creating very few new houses during the Local Plan period;

Reliance on third party developers wanting to buy land parcels removes any certainty that housing need will be met at the appropriate time and within the Local Plan period;

Financial stress to the LDV caused by any of the risk factors outlined above may delay infrastructure delivery and therefore housing build rate;

Even based on the unfunded business plan in the Viability Assessment, WoB does not deliver on the promise of "Infrastructure First":

- o A key element of any Garden Community, the Country Park, is not provided until 2031;

- o Only £6.8m of the £19.1m (35%) of Community and Health Facilities are provided within the first 10 years of construction ;

- o Only £7.7m of the £23.4m (33%) of Open Spaces and Leisure & Sports Facilities/ Pitches is delivered within 10 years;

- o No secondary school is built until 2029

By taking a 50 year view on the Garden Settlement, it is very possible that the council's responsibility to deliver housing in the Plan period will be missed due to the over-ambitious, unproven and unworkable business plans which the council is attempting to deliver in 3 communities simultaneously.

Despite the Keslake report stating that "this is an excellent example of cooperation between councils" there is no evidence of this for West of Braintree:

- The other Garden Communities in Part 1 of the Local Plan are collaborations with other District Councils – Colchester DC and Tendring DC. In the case of West of Braintree there has been total lack of strategic cooperation with the neighbouring District Council, Uttlesford;
- Despite the AECOM studies focusing on a land parcel which includes land in Uttlesford, the only option laid out in detail in the most recent report is the one which does not include the Uttlesford land;
- Uttlesford is not a shareholder in North Essex Garden Communities;
- A number of weeks into the BDC consultation, Uttlesford's Local Plan consultation was launched, with a Local Plan which includes West of Braintree; the plan refers to infrastructure provision, housing provision numbers and other items from the AECOM reports prepared for NEGC, of which it is not a part.

It is hard to fathom how the same plot of land can be developed both by an LDV under the NEGC umbrella and by a standalone district council. This lack of cooperation is in clear contravention of the Garden Settlement principles as well as the Local Plan requirements and renders all the work completed to date meaningless. Uttlesford DC pays lip service to cooperating with Braintree DC but not has provided a single piece of evidence of contact between the two councils.

Consistency with National Policy

The proposed Local Plan and in particular the proposed West of Braintree settlement is NOT sound in planning terms; it is premature, it is not sustainable, it is not viable and it contravenes many of the National Planning Policy Framework (NPPF) Guidelines and it also does not comply with certain key Garden City principles and objectives. In particular the NPPF states:

Paragraph 151. Local plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end they should be consistent with the principal and policies set out in The National Planning Policy Framework (NPPF).

The proposed West of Braintree settlement is NOT a sustainable development.

Paragraph 155. ***Early and meaningful engagement and collaboration with neighbourhoods is essential.***

Though the technical elements of a consultation have been undertaken, Braintree District Council (BDC) or their consultants (AECOM) have NOT undertaken any meaningful engagement and collaboration with the local community and have not incorporated feedback as they continue to push forward without consideration of public comment. ALL of the Local Parish Councils have written to BDC objecting to the WoB new settlement proposal and asking BDC to re-think their planning approach. There has been no "collective vision for sustainable development in the area".

As part of the last round of consultation on the local plan, the WoB Garden Settlement proposal was to include 'Andrews Airfield' site that sits within the adjoining Uttlesford District Council (UDC). Despite this BDC have not 'partnered' with UDC as part of the Garden Settlement Group even though they have partnered with Colchester DC and Tendring DC.

UDC have recently decided to include WoB/Andrews Airfield as one of their preferred settlement sites in their emerging local plan. Due to the complete lack of co-operation and collaboration between BDC and UDC there is no 'joined up' planning strategy between BDC and UDC for this overall planned new settlement - this is in direct conflict with NPPF paragraph 155. This could result in a disjointed, non-functional planning strategy for this area. There is currently no collaborated scheme proposal, no joint highway proposal, and no overall master plan vision - this in planning terms is totally unacceptable.

Paragraph 158. ***Each LPA should ensure that the local plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.***

It is highly questionable whether the latest economic or environmental evidence provided by BDC substantiates a development of this sheer size in this particular location. What follows is a summary of key planning concerns:

HIGHWAYS - Promoting sustainable transport

Paragraph 29. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.

Paragraph 30. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. LPA's, when preparing local plans, should facilitate the use of sustainable modes of transport.

Paragraph 34. Developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

Paragraph 35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.

West of Braintree does not comply:

- The WOB site is reliant on car use. AECOM acknowledge that "Development of a non-car dependent scheme will be a challenge without "major" bus and rail infrastructure links";
- The WOB site has no direct London route;
- The site has no rail connections and poor availability of public transport.
- No rail links are being proposed. AECOM also acknowledge "Given the existing nature of the site there are little immediate transport networks with capacity to support development at this scale"
- There is a current lack of cycle and pedestrian infrastructure in the surrounding area;

ROADS

The local road network is wholly unsuitable for a development of this size:

- It is forecast that numerous junctions in and around Braintree will be over capacity by 2032;
- BDC's Infrastructure Delivery Plan states "Much of the road urban road network in Braintree District is over capacity in the morning and evening peaks";
- The site is currently served by tertiary roads and small rural lanes; these provide limited connectivity to the site from the north and south;
- Initially the proposal was to create a new junction off the A120 to serve the new settlement. However this proposal is now on hold for an unspecified period due to Tarmac recently being granted planning consent for a new quarry on the front part of the proposed settlement site that adjoins the A120. It is unclear at this stage when CRH/Tarmac intends to commence extraction. The proposal is to now access the first phase of the settlement off the minor B1256 road. This road junction has not been tested by Jacobs, the County or BDC and it is likely that it will be wholly inappropriate to serve the proposed settlement site, particularly bearing in mind its proximity to the Mineral Extraction site entrance;
- In AECOM's preferred option, the emergency access road, which would be the only access in the event that the Blake End junction was blocked, is Pod's Lane. Pod's Lane is a single track road with limited passing points and multiple blind corners. It is also a Protected Lane. Local Policy ADM 54 determines that "*Any proposals that would adversely affect the physical appearance of these protected lanes, or give rise to a material increase in the amount of traffic using them will not be permitted*". It is

difficult to imagine that WoB would not increase traffic on Pod's Lane. In an assessment of the 150 protected lanes undertaken by Braintree DC in 2013/4, only one lane attracted a higher score than Pod's Lane, reinforcing its value to the district on all the factors measured;

- Pods Lane is also referred to in the WoB plan by AECOM as a "Quietway" intended to encourage leisure uses such as walking and cycling. It is included in the Feasibility Assessment with a £300,000 investment. These two uses cannot possibly be compatible – Fire Service Vehicles, Ambulances, bikes and pedestrians cannot safely share road space on a single track road. This suggests that the authors of the report have not properly surveyed the site - a sign at the southern end of Pods Lane states that the road is not suitable for heavy vehicles, which must include Fire Engines. What is the Plan B?;
- WoB is reliant on the A120. AECOM acknowledge that "current congestion issues on the A120 mean connectivity along this route to the east is likely to be constrained now and in the future without the proposed A120 improvement scheme". Currently there is no funding guarantee that these highway improvements will be forthcoming;
- WoB could harm the A131 Chelmsford route (which is already over capacity) and Junction eight of M11.

ALTERNATIVE FORMS OF TRANSPORT

Alternatives to car transportation are limited and the plan does not contemplate an integrated regional transport plan:

- Accessibility to surrounding urban settlements by active modes is limited;
- It will be a challenge to access rail stations from the WoB site without a car;
- Braintree has a very poor rail service 1TPH – improving capacity is difficult due to the single track alignment. Commuters to London in the surrounding area typically drive more than 10 miles to Chelmsford, Bishop's Cleeve or Witham

There is a real risk that due to a complete lack of alternative public transport the settlement could end up a dormitory town reliant on the private motor car. AECOM's previous aspirational Target Model split for this settlement was car 30%, public transport 30% and walk/cycle 40% - however the reality of the situation is that Braintree's current mode split is car 75%, public transport 12%, and walk/cycle 13%. There is no evidence whatsoever to support AECOM's aspirational mode split for the settlement growth area.

AECOM acknowledge that "limiting car use and therefore parking provision is entirely dependent on the local provision of employment and services within walking or cycling distance". However Braintree is not a major employment destination location, unlike Chelmsford, Cambridge, Colchester, Harlow or London, yet none of these locations can be accessed from the proposed settlement other than via car.

AECOM further acknowledge that "this settlement location has the potential to be used as a residential base to commute to existing centres of employment" and "the site offers limited synergy with the established settlement and the local employment and commercial centres. These distances also limit the case for active modes of transport" "Development of a non-car dependent scheme will be a challenge without major bus and rail infrastructure links".

No rail links are being proposed and we are still awaiting details of what, if any, major bus links are being proposed in this plan period.

POLLUTION

Paragraph 110. In preparing plans the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value.

Paragraph 93. Planning plays a key role in helping shape places to secure a radical reduction in greenhouse gas emissions – this is central to achieving sustainable development.

Paragraph 95. LPA's should plan for new developments in locations and ways which reduce greenhouse gas emissions.

- Due to the reliance on the private motor car there is an increased risk of CO2 emissions;
- Due to the unique character of the area being in a dark area this will be harmed by the light pollution created;
- There is clearly no overriding case presented to override the unnecessary and unsustainable loss of natural environment and detrimental impact on the historic setting. This runs contrary to NPPF Sections 11 (Conserving and enhancing the natural environment) and 12 (Conserving and enhancing the historic environment).

RETAIL and EMPLOYMENT - **Ensuring the viability of town centres.**

Paragraph 23. Recognise town centres at the heart of the communities.

Where town centres are in decline LPA's should plan positively for their future to encourage economic activity.

It is important that need for retail, leisure, office and other main town centre uses are met in full.

Again, WoB fails to meet this requirement:

- There is a need for retail to support the new housing but this conflicts AECOM's concerns that no large single Town Centre be provided as part of WoB as this could detrimentally impact on the vitality/viability of Braintree town centre – further impacting on its resilience. AECOM acknowledge that “a development of this scale could have the potential to act as a competitor location and thus impact the resilience of established centres, especially Braintree Town Centre”. It has been suggested by BDC that the level of new retail provision for the new settlement should be limited. However AECOM question “whether it would be appropriate for retail provision in the proposed neighbourhood centres to be restricted to just a supermarket and small convenience shops for a settlement of this size. By comparison they refer to Saffron Walden which has only approximately 56,500 homes and yet has a thriving town centre offering a wide range of convenience and comparable shops” (All within easy access of the homes);
- WOB is not self-sustaining - it has limited employment opportunities resulting in reliance on commuting. AECOM acknowledge that “the proposed settlement performs relatively poorer against the criteria (criteria being a self-contained settlement) which extols sustainable access to local jobs in the wider area”;
- WOB has a risk of becoming a dormitory settlement;
- The major employer in the area is Stansted – WOB has no direct link with Stansted other than by road. The owner of Stansted, MAG, has previously made representations to BDC objecting to this proposal and expressing their concerns about the reliance on car and the adverse impact on Junction 8 of the M 11;
- Braintree, along with some of its near neighbours, is already an exporter of labour, despite historic investments such as Skyline120;
- AECOM aspiration is to achieve one new job per one new dwelling. However AECOM acknowledge that this “employment scenario is quite ambitious and their achievability depends on many different factors, some of which are too difficult to influence”. There is no evidence what so ever that this target can be met;
- BDC's assumption that 25% of the community will work from home is completely unrealistic, unfounded and there is no evidence what so ever to support this scenario.

LANDSCAPE AND ENVIRONMENT - Conserving and enhancing the natural environment.

Paragraph 109. Protect and enhance valued landscapes.

Prevent new development from contributing to unacceptable levels of soil, air, water or noise pollution.

Paragraph 111. Planning policies should encourage the effective use of land by re-using land that has previously been developed (brownfield land).

BDC have yet to formally issue the list of brownfield sites within the District. This is very disappointing given where we are with the emerging Local Plan and it is difficult therefore to meaningfully comment on whether BDC has met its planning obligation to encourage the effective use of land by re-using land that has previously been developed. We do know however that BDC have been offered and have turned down 400 other sites for development of which approximately 100 were brownfield sites.

The BDC/ NEGC argument for a Garden Towns is heavily based around provision of affordable and social housing stating that smaller sites are not viable due to Section 106 agreements on smaller sites with less than 10 homes are not required to comply and provide social or affordable housing. The argument is taken that building a 'Garden Town' is then the only way of providing affordable housing. This is quite simply incorrect. TCPA have published a resource document for Councils detailing a variety of methods by which social and affordable housing in rural areas can be provided and yet this document does not recommend a Garden Town as the solution.

We also know that in March 2016 The Ministry of Defence listed the Wethersfield RAF base as one of 10 sites to meet the target of 160,000 new homes in the UK by 2020. Wethersfield is located less than 10 kilometres from Braintree it has the potential to provide land for up to 4,850 homes. The site will be transferred to the Homes and Communities Agency by 2020 for disposal. The Homes and Community Agency will work closely with the Local Planning Authority and other interested parties to consider the best possible future use for the site. Wethersfield is a true Brownfield site and will be available in 2020 and yet it has not been included or mentioned in the emerging Local Plan. This is a major failing on BDC's part and unlike WoB/Andrewsfield it has infrastructure already in place and it is closer to the Cambridge Science Park where housing demand is even greater.

Paragraph 112 LPA's should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary LPA's should seek to reuse areas of poorer quality land in preference to that of a higher quality.

Paragraph 118. Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats including ancient woodlands and the loss of aged or veteran trees.

Paragraph 123. LPA's should identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

Paragraph 125. ***Planning policies should limit the impact of light pollution on intrinsically dark landscapes.***

Paragraph 126. **LPA's should set out in the local plan a positive strategy for the conservation and enjoyment of the historic environment including heritage assets.**

Paragraph 132. **When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation.**

The WoB plans fails to address these provisions:

- Ancient woodlands and hedgerows exist and need to be protected and incorporated within any scheme - details of how this can be achieved are still to be issued;
- WoB will impact on the character and amenity of surrounding villages including Great Saling, Bardfield Saling, Stebbing and Rayne and change the landscape setting forever;

- The site is located in the minerals safeguarding area. This will limit the scope of development in the short term, as has been demonstrated by the recent planning consent granted to Tarmac for a new quarry on part of the proposed site, sterilising its housing development and highway potential in the short/medium term. It will restrict access points and result in a noise and environmental Protection zone - BDC have still to demonstrate how they will overcome these issues within the local plan period. It is not clear at this stage when Tarmac intends to commence gravel extraction at the site;

- The proposal would result in the loss of 2,500 acres of grade 2 versatile farmland. AECOM acknowledge that "the scale of the development proposed will undoubtedly have a significant impact on the surrounding settlements ... and the nature of the area may be altered as part of the process" They go on to state " Large scale development of the site would impact on the rural character of the small settlements surrounding the site"

- The site is adjacent to a conservation area with many listed buildings and could have a detrimental impact on heritage assets.

UTILITIES

AECOM acknowledge that "to achieve a development of this size will require significant enabling infrastructure which does not currently exist on the site". The Braintree Infrastructure Delivery Plan (May 2017) makes mention of the utilities requirements but does not cost them:

- Both Pods Brook and River Ter are already failing to meet the water framework directive target of good ecological status and the WOB site is to be considered a risk of further deterioration in water quality;

- The use of SUDS is limited due to the existence of London clay;

- A new 11 KV underground cable will be needed to serve WOB causing significant disruption. A new primary substation will be needed which will be very costly and it not clear from BDC's Infrastructure plan how it would be funded - U.K. Power Networks would not be permitted under its license conditions to invest ahead of a speculative development such as this;

- A new recycling water plant will be needed. This will be very costly and depends upon Anglian Water including it in their infrastructure plan for the next Asset Management Plan which runs from 2021-25. If AWS does not include it, development will be delayed with associated financing costs to the LDV or the costs will need to be directly borne by the LDV, increasing the financial burden;

- Possible flood risk at Pods Brook channel need to be overcome;

Facilitating the sustainable use of materials.

Paragraph 143. In preparing local plans, LPAs should define Mineral Safeguarding Areas and set out policies to encourage the prior extraction of minerals.

We know that Tarmac have identified minerals on a large part of the proposed settlement site which in effect has sterilised this part of the proposed settlement from being developed for housing in this next plan period. Are BDC confident that no other parts of the proposed settlement site have minerals that need safeguarding?

In summary, there are a multitude of factors from both a financial and a planning perspective which need to be addressed before West of Braintree can realistically be seen as a viable or sustainable contributor of housing over the plan period. Whilst the need for more housing is not in doubt, the proposed location with its lack of existing infrastructure and absence of any compelling characteristics which would attract employers, developers or residents, makes the likelihood of it delivering any meaningful number of houses before 2033 very low.

The lack of a realistic land purchase and funding strategy also makes WoB, along with the other Garden Settlements, a hugely risky gamble with taxpayer's money. Even the most successful New Towns such as Milton Keynes have been proven not to be profitable in the long term. Essex County Council and Braintree District Council simply cannot afford to support an ill-conceived and incredibly risky enterprise such as this.

If your representation is more than 100 words please provide a summary here

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Please specify the changes needed to be made to make the Plan sound/legally compliant

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Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Do you wish to participate in the oral part of the examination? Yes

Please outline why you consider this to be necessary

There will undoubtedly be attempts to discredit or refute this representation and it is therefore appropriate for us to be present in order to uphold and provide justification for our assertions.

Did you raise the matter that is the subject of your representation with the LPA earlier in the process of the preparation of the plan? Yes

which stage?

. Issues and Scoping

Do you wish to be notified:

- . When the document is submitted for independent examination
- . When the inspectors report is published
- . When the document is adopted