

IF YOU WERE GOING TO BUILD A NEW TOWN, YOU WOULDN'T START HERE

1. Matter 1, Questions 5 and 10

This Statement has been prepared on behalf of the six Parish Councils identified below and SERCLE (Stop Erosion of Rural Communities in Local Essex). It supplements responses made by the individual bodies to the consultations on the draft Braintree Local Plan in August 2016 and July 2017 in respect of the 'Garden Community' proposed for West of Braintree ('WoB').

2. Root of Objection

The three LPAs have brought shame on the planning process by proposing 'garden settlements' without thorough and proper analysis of how new homes could be provided in a more sustainable way in more sustainable locations. This leads unequivocally to the conclusion that this has all been driven by the potential for access to the much greater sums of public money that building a standalone 'garden community' offers to the LPAs versus using brownfield sites located close to existing towns.

There are two individuals responsible for the egregious folly of 'West of Braintree' – the Leader of Braintree District Council and the owner of much of the land set aside for it. The latter responded to BDC's 'Call for Sites' in a way that any landowner might – putting forward his land for residential development: positive responses such as his are not always met with positive responses on the part of LPAs, particularly if, as in his case, the great majority of the land in question was undeveloped land in the countryside.

The Braintree Chronicle (on the 30th November 2015) has attributed to the Leader of the Council that he;

said: ***The Council must save £3.34million by 2020***

vowed: **to build thousands of homes** to offset having to make more than £3 million of savings by 2020

warned: *"tough decisions" will need to be made in light of a reduction in government funding, but explained providing more homes will bolster council coffers.*

said: *"Building more houses will increase our tax base as we will receive more funds from things like new homes bonuses and council tax."*

Financial considerations alone should not and should never be the root of plan-making. In our view, the National Planning Policy Framework ('NPPF') at paragraph 14 emphasising the importance of 'sustainable development' gives us lay people a good insight into the necessarily more complex, objective process that should be the root of plan-making;

At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.

For **plan-making** this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet *objectively assessed needs*, with *sufficient flexibility to adapt to rapid change*, unless:

— any *adverse impacts* of doing so would *significantly and demonstrably outweigh the benefits*, when *assessed against the policies in this Framework* taken as a whole; or

— specific policies in this Framework indicate development should be restricted.

Public money is vital to the creation of expanded or new settlements, yet, in this instance, there is none, or very little.

The assessments made by and on behalf of the 3 LPAs have not been properly costed and tiny and highly unrealistic contingencies have been built in. What if, as is the norm for most public building projects of recent times, costs go higher? See for example, Crossrail, the Olympic Stadium, the Millennium Garden Bridge (scrapped at a cost of £50m to the public).

So, if it all were to go wrong, precious and attractive countryside, valuable productive, agricultural land and the small settlements within and adjacent will be lost or spoiled in the folly of building new homes (with ludicrously optimistic assumptions being made about how jobs, public transport and physical and social infrastructure will come along at the same time).

3. Process

PRINCIPLE 7 - COMMUNITY ENGAGEMENT

THE GARDEN COMMUNITIES ARE A LOCALLY-LED INITIATIVE, AND THEIR DEVELOPMENT WILL BE SHAPED THROUGH ENGAGING EXISTING COMMUNITIES AND EMERGING NEW COMMUNITIES; RESIDENTS WILL BE EMPOWERED TO CONTRIBUTE TO SHAPING THE FUTURE OF NORTH ESSEX.

Despite these words from the North Essex Garden Communities Charter published in June 2016, numerous intelligent people have complained to us that they have been unable

to follow what the LPAs are doing or proposing and worry that 'Issues and Options' are underway when the principles have not been established or agreed.

In respect of Andrewsfield, BDC has repeatedly said that it is not looking at the detail, it is just an area of search etc. It chose the site then commissioned the reports i.e. it is a flawed process. This alone represents an unsound Plan.

A local plan process that moves quickly and soundly is a desirable thing; but it cannot, ever, be rushed or be confusing to the public.

The very fact that this key stage is being carried out either side of the Christmas and New Year period, when the majority of people have far too many important and everyday things to occupy them rather than worry about hugely significant things that affect their futures and the future of the place in which they live, says a lot. Normally developers and planning consultants are careful to avoid submitting planning applications that might prove contentious or controversial before Christmas, lest they be accused of trying to pull a fast one on the concerned public. The same ought to apply to the timing of important stages of the local-plan making process.

The 3 LPAs ought to be ashamed at selecting as the venue for the Examination a football stadium accessible only by car and 27 miles and 35 minutes' drive in off-peak conditions from Great Saling and the other affected villages and hamlets and with capacity to seat only 60 members of the public. It cannot have been difficult to find an accessible town centre facility with more seating? The importance of public participation in planning, something I was brought up on, seems to have gone right out the window in this instance.

The process so far has been non-consultative and confusing with the majority of existing local residents' opinions being totally ignored and, setting aside its negligible emphasis on genuinely sustainable town planning, it has been profoundly undemocratic.

4. Core Provisions of the NPPF

These are well-known and it is unnecessary to repeat them. However, the clear exhortations of paragraph 155, resonate with the six Parish Councils and those they represent and with SERCLE because the LPA in their collective view ignored them;

Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

5. TCPA

The TCPA published the first 'Garden city standards for the 21st century: Practical Guides for Creating Successful New Communities' in draft on the 17th November 2017. Guide 1 is about 'locating and consenting new 'garden communities'' (submitted now for

addition to the Evidence Base). This contains numerous **Recommendations**. The following are highly relevant to West of Braintree. We comment briefly on whether or not we consider that the LPA has adhered to them in the formulation of its proposals as they are for West of Braintree.

Organisational Approach (section 3.2)

The local authority should clearly set out in the Local Plan or a supporting document the proposed process for assessing the need for and locations of new 'Garden Communities', including how local people will be involved. NOT DONE

Local councillors should play a proactive role in explaining the process and communicating to local residents and investors both the long-term vision and the multiple benefits of investing in large-scale development. NOT DONE

Locational Criteria (section 3.3)

Authorities should consider the full range of growth solutions, using a sound evidence base to ensure that the right long-term approach is taken and avoiding any temptation to 'bolt on' housing estates to existing towns and villages where a more sustainable long-term option is available. NOT DONE

Processes of identifying locations for new 'Garden Communities' should consider how places are connected physically (i.e. by rail and road), economically (i.e. through economic and travel-to-work patterns) and socially (i.e. through the provision of services between settlements) as a key indication of likely success and to maximise opportunities to facilitate low-carbon lifestyles. NOT DONE

Resource use within environmental limits, the achievement of social

justice, and positive impacts on biodiversity and assets of ecological, landscape, historical and climate resilience value should be used as key assessment criteria in SEA/SA and other site assessment processes.
NOT DONE

Where sites are put forward by the private sector, authorities should require the proponent to demonstrate how the sites meet these criteria. NOT DONE

The conclusions of the Parish Councils and SERCLE in respect of these Recommendations alone, and it is acknowledged that they are in draft and by a non-government organisation, albeit one with tremendous influence over the practice and development of town and country planning in this country and overseas, is that the Local Plan is seriously flawed and unsound.

on behalf of;

Bardfield Saling Parish Meeting

Felsted Parish Council

Great Bardfield Parish Council

Great Saling Parish Council

Rayne Parish Council

Shalford Parish Council

SERCLE (Stop Erosion of Rural Communities in Local Essex)