

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

### **1. Matter 2: Presumption in Favour of Sustainable Development**

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. Housing Need and Location**

The Department of Communities and Local Government ('DCLG') published on 14th September 2017 in draft its Proposed formula for assessing housing need.

The indicative assessment of housing need in Braintree District based on proposed formula for 2016 to 2026 is 835 dwellings per annum.

This should be compared with the Current Local Assessment of Housing Need, based on the most recent publically available document. This is 716 dwellings per annum.

There is, therefore, a proposed increase of 119 dwellings per annum with the proposed formula.

**If** the draft revised indicative assessment of housing need in Braintree District were to be adopted, there would need to be 8,350 new homes in the District between 2016 and 2026. These would be spread across existing settlements, in particular the largest towns, and would not be concentrated on only one site. To do otherwise would go entirely against the long-established principles of town planning.

**If** the same draft revised indicative assessment of housing need were applied up to 2033, the end year of the Local Plan, there would need to be 14,195 new homes in the District, again spread across it.

### **3. Sustainable Development: BDC Brownfield Land**

The key issue for us is that BDC has taken up a Government initiative and BDC sees its role to use this to its advantage by securing funding.

In the short timescale available it made rapid decisions to choose the sites without any prior consideration of suitability and have gone way further than the local population needs without any consideration of local demographics to fit the funding requirements. All supporting reports were commissioned thereafter and there is no consideration of alternatives. We refer the Inspector to the report submitted by Shalford Parish Council that ask why not build on the southeast side of Braintree, especially as Essex County Council has just secured funding for a junction off Millennium Way.

The only reason against so doing is that it would be considered a town extension and not be eligible for funding support. However it would prove to be much more cost efficient in delivering housing in the right place, with connectivity, cycling access, employment, social facilities, recreational facilities including parks and a golf course to link with and provide mutual support.

The landowners have not shown any demonstrable commitment to Garden Communities at all – it is the District and Borough Councils who are doing all the legwork and getting the funding to pay for the commissioned reports for evidence. Everything is done in the wrong order. There was clearly time pressure to succeed with the funding grants.

As is demonstrated below, using BDC's own figures, BDC has an excess of housing land on offer to it- it was its choice to limit options. This has been met with considerable, well-founded local opposition.

BDC published its SHLAA 2016 in September 2017 for Brownfield land. This includes 'Andrewsfield' (also known as Saling Airfield) with potential for 7,500 new homes. Andrewsfield is by no stretch of the imagination 'brownfield'.

Excluding Andrewsfield, Potential Housing Yield from 110 brownfield sites put forward in the Call for Sites of 5,730 new homes.

This list of Brownfield sites was only produced and released AFTER BDC had decided that West of Braintree was its ideal location on which to build. The Chancellor of the Exchequer in his Budget Statement on 22nd November 2017 made clear that;

### **Planning should focus on**

- **Urban areas making the best use of brownfield land**
- **building high quality, high density homes around transport hubs.**
- **Permit more homes aimed towards first time buyers**

In respect of the last element, we note below the assumption in the Viability Assessment for the LPAs by Hyas Associates Ltd that its modelling assumed only 30% affordable homes, not the 40% required by current local planning policy.

The BDC SHLAA 2016 summarises the Agent's Comments about Andrewsfield at column AL. The LPA appears to have been swept away at the alluring prospect of development on it.

*Refer to previously submitted information on outstanding site attributes; **No land acquisition issues, potential to link to and improve currently limited A120 junction, significant gravel deposits, potential for rowing lakes and country park, potential development jointly with UDC on previously developed airfield and incorporating existing business units, potential linkage with housing proposals to west, realisable long term new settlement of sufficient size to be truly sustainable and intended/deliverable high level of affordable housing***

We have a number of comments on this:

**a. Land Ownership and Location**

It has been reported that BDC rejected certain brownfield sites much closer to the urban hub of Braintree (and therefore capable of supporting its facilities imperiled over the years because of numerous factors including reduced public expenditure, Freeport, changed patterns of retailing and shopping) because the multiplicity of ownerships made things 'complicated' – so much easier to deal with an individual landowner of a site of 910 hectares, with an estimated Potential Housing Yield (SHLAA column AS) of 7,500 new homes.

Witham is the most sustainable location in Braintree District – on the main London Liverpool Street – Chelmsford – Colchester – Ipswich – Norwich railway line, on the A12 Trunk Road and with good facilities – the sensible places to consider for substantial further expansion. Apparent consideration of this by BDC? Not a lot.

**b. The A120**

The A120 – paragraphs 215, 216 and 219 in the Conclusions section to the Transport Assessment by Ringway Jacobs and Essex County Council on the Preferred Option state unambiguously;

In this respect, the Conclusions to the Preferred Option Highways and Transport Planning Assessment published by Ringway Jacobs and Essex County Council in March 2017 are of fundamental importance.

Paragraph 215 states:

*Essex Highways Transport Planning team have been commissioned by Essex County Council (ECC) and Braintree District Council (BDC) to assess the likely transport impact of the Local Plan preferred option and identify possible mitigation measures. BDC provided a list of sites to be modelled as their preferred option, including three variations in housing growth and associated employment at the 'Garden Communities'. In the low growth scenario approximately 12,000 homes and 7,500 jobs are forecast to be created by 2033, whereas approximately 16,000 homes and 9,500 jobs are forecast to be created by 2033 in the high growth scenario.*

Paragraph 217 states:

*21 key junctions were identified for more detailed assessment, including investigating the impact of possible improvements to the junctions to better accommodate growth in traffic. Without such mitigating measures only one of the junctions was shown to be able to accommodate 2033 forecast demand. It should be acknowledged however that 11 of the junctions are currently at capacity and are forecast to be over capacity in 2033 with background growth alone. Two of these junctions could be mitigated, although one of these relies on the implementation of an all movements junction at J24 on the A12. At a*

*further six junctions it was possible to recommend specific improvements that will alleviate future forecast demand. One of these is also dependent on the implementation of an all movements junction at J24 on the A12. A further two junctions are being studied by Highways England on the A120 for short term improvements prior to any possible new A120 route. There is also ongoing work to refine trip generation characteristics of the proposed 'Garden Communities'.*

Paragraph 219 states:

*It is clear that using conventional and accepted analysis of forecast trips, it will not be possible to accommodate the forecast vehicle trips on the network, despite even with significant junction improvements. In addition to infrastructure improvements, there will have to be significant interventions to reduce the demand for private car travel and improve public transport, cycling and walking provision and uptake.*

What the authors are saying, effectively, is:

*"It's stuffed now, it will be stuffed in the future, it doesn't matter if you stuff it even more.*

*We are not trying to make the network work. The best that we can do is to mitigate the effect of the proposed development in 2033.*

*We cannot provide the level of capacity that would mean people do not experience delays driving to/from work, school, college or wherever else in the morning/evening peaks".*

Deepening the gloomy prognosis, the Andrewsfield Garden Village Transport Assessment prepared by Capita and published June 2015 does not contain a 'Capacity Assessment'. Detailed Capacity Assessments are essential in order for the local highway and planning authorities to assess the traffic impact of a proposed development. Without a Capacity Assessment it is difficult, if not impossible, to know how Capita reached its conclusions. The LPA, which exhibits a marked lack of interest in detail, does not seem too concerned about this: it should be.

Property developers (understandably) do not want to commission the full work, including traffic Capacity Assessments, until a planning application is to be submitted. In the case of Andrewsfield, the Inspector needs to take this important consideration into account. What it means is that any conclusions reached in respect of traffic impacts at Andrewsfield will be suspect, more than possibly ruinously suspect.

#### **4. TCPA Core Principles for 'Garden Cities'**

The Town and Country Planning Association ('TCPA') published 'The art of building a garden city: Garden city standards for the 21st century' in July 2014. Three of the core principles of 'Garden Cities' are;

- ❖ **A wide range of local jobs in the Garden City within easy commuting distance of homes.**
- ❖ **Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.**
- ❖ **Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.**

The Parish Councils and SERCLE, although admiring vision and sensitive, realistic, well-considered developments of 'vision' into proper planning, are most doubtful that any of these three core principles will come about at WoB.

The TCPA published a blog on the 17th November 2017 *calling on the Chancellor to be brave and bold in the Budget, setting out a commitment to genuine garden cities that:*

- ***have local support;***
- ***provide affordable homes for all;***
- ***are in sustainable locations, well served with public transport;***
- *ensure the highest-quality design standards on everything from accessibility to climate change;*
- ***provide for work and a vibrant social and cultural life close to people's homes;***  
*and*
- ***provide for the sharing of development values for the long-term stewardship of community facilities and green spaces.***

*The TCPA has long advocated the standards necessary to build genuine garden cities and is publishing two new guides today which set out the criteria for how new communities should be located and how they can be financed. A key lesson from the past is that success depends on national and local government doing its homework on the right locations. Garden cities can't be produced like rabbit out of a hat; they require quality and an expert process of site selection, with space for real community engagement about the benefits of scale growth.*

The blog is at: <https://www.tcpa.org.uk/Blog/the-budget-is-the-real-test-of-governments-commitment-to-quality>

None of the text in **bold** above applies to West of Braintree.

## **5. Absence of any Factor needed to create a new Settlement West of Braintree**

### **a. Preamble**

WoB features none of the attributes that have led to the creation of settlements in the past, such as a good supply of water (see below c. Adequate Drainage and Sewerage) or a location with good access (by any means of transport).

No New Town or Expanded /Overflow Town or Garden City in the United Kingdom has ever been pursued without there being, or there being programmed or planned, a railway station.

### **b. Railway Stations**

There are three railway stations at various distances from WoB (using the CM6 3TH postcode);

- i. Braintree: branch line terminus, hourly service to Witham via Braintree (Freeport) and Cressing: 11.5km / 7.1 miles – 13 minutes off-peak drive
- ii. Witham: mainline railway station; 21.2km / 13.2 miles – 21 minutes off-peak drive
- iii. Stansted Airport: 20.6km / 12.8 miles – 21 minutes off-peak drive

The six Parish Councils and SERCLE support initiatives to increase the use of public transport and for people to walk and cycle, reducing the need to sue the car. However, all these railway stations are too far away to be of regular use by people living in the area now, let alone a new town at WoB. For any public body to believe that they have realistic and economical potential as the basis for an ambitious new public transport system featuring rapid transit buses linking them to WoB with no programmed funding at a time of continued austerity is fantastical and delusional.

We note that Network Rail has made no contribution to the plan-making process. As the body that controls railways in this country, this is a significant and troubling absence.

In respect of Braintree railway station, the route of the railway east of Braintree is single track, limited to hourly service and the topic of decades of prevarication about the 'Cressing Loop' that could ease capacity issues to improve the current service from its terminus in Braintree.

There has been reference to Stansted being a transport hub – it is nothing of the sort - a hub is centrally-positioned (as with the hub of a wheel), whereas the railway station serving the airport is a terminus.

Manchester Airports Group, which owns Stansted Airport is on record as saying that it does not want commuters using the railway station which is there to serve the airport alone. The £3.50 charge simply to drop people off at the Airport Terminal would deter all but the most determined and well-off commuter in any event.

There are very limited public transport bus services to Stansted Airport.

The option to extend the railway east of Stansted Airport (as originally envisaged by the architects) was compromised early on as further airport buildings including Radisson Hotel were built.

There is no record of Network Rail ever considering filling the gap in the network between Braintree and Stansted Airport. This is not in itself surprising. What is more surprising is that this section of rail infrastructure could have been a genuine catalyst for Braintree regeneration as Stansted was developed and grew and yet seems to be a blind spot for the County's planners. This all adds to what we as local people regard as a massive credibility gap on the parts of BDC and ECC regarding the integrity of the WoB proposals.

The original Braintree to Bishops Stortford railway line alignment, axed as part of Beeching line closures in the last 1960s, now accommodates sections of Essex County Council's Flich Way Country Park, underneath the B1256 Dunmow Bypass or is lost under farmland.

### **c. Adequate Drainage and Sewerage**

Dean McBride, who has developed considerable expertise in community sewerage infrastructure, has closely examined the North Essex Sewerage Infrastructure for the proposed Garden Communities, particularly in respect of West of Braintree.

The crux of the problem with West of Braintree in drainage and sewerage terms is quite simply: It is not sustainable, the area has too many constraints to meet the NPPF guidelines. His conclusion is that in respect of this single, important infrastructural point, it is extraordinary that it has been brought forward for housing.

The local sewerage works at Rayne and Braintree are not sustainable. The Braintree District Council Water Cycle Study, published March 2017 states that significant reinforcement of the network of water recycling centres ('WRCs) is required to provide for the additional growth at the West of Colchester Garden Community and may be required for the West of Braintree Garden Community. The WRCs at Braintree, Bocking, Coggeshall and White Notley will require improvements to ensure that the increased waste water flow discharged does not impact on the quality of the receiving watercourses and their associated ecological sites.

Even if a complete new sewerage works is built for WoB even that wastewater still has to be pumped to another sewerage works (at Bocking, 6km / 3.7 miles away) and from there (and with its own treated wastewater) will have to be discharged somewhere upstream.

The two local rivers, Pods Brook and the Ter, are too small to discharge treated wastewater. Nevertheless, the North Essex Garden Communities Integrated Water Management Strategy Stage 1 Report from August 2017 notes that if the new WRC discharges into the river Ter, it is assumed that it would discharge into the upper reaches of the catchment. This option would require approximately 1.3 km of new pipeline and a new pumping station.

There is confusion in the documentation about Bocking Sewerage Works: on one hand it could take sewerage from the WoB development at the beginning and then in another instance it could do take sewerage only up to 2032.

The drainage ditches and other water areas will flood because the density of the clay soil, and in one part of Saling the clay is 10 metres deep, makes using soakaways impractical, leading to excess run-off.

Therefore, the run-off from all the *circa* 9,000- 10,000 new homes will need to discharge into sewers, the majority of them new. Typically, the run-off from perhaps 70% - 80% of homes would discharge into sewers.

The LPA indicates that overhead electrical power lines may have to be used if it is not possible to lay pipes in clay. This further diminishes claims that WoB is sustainable.

The density of clay varies across the area but in the village of Great Saling and Bardfield Saling most people are on the septic systems. Homes with mains drainage are confined to a few 'Grove Villas'.

The alternatives considered included building a 'supersize' sewerage works for the three 'garden communities' to drain to. If that was the case, a super sewer would have to be built for WoB to connect to it (as it would have to bypass the Bocking Sewerage Works), bearing in mind the local rivers used for the dispersal of the treated wastewater would have to be greater in size as not to harm the environmental standards for that much treated wastewater returning to the river system and be more central for all 3 'garden communities' to attach to.

Dean McBride has written that, as an outsider who knew what he was looking for he had found that the information available to the general public to be quite invisible. It took him 3 weeks to obtain constructive information. The general public should have been given information on the state and capacity of the sewerage system in the Braintree 'Infrastructure Delivery Plan' under the section 'Utilities', but it was missing only talking about future 'garden communities'.

Having read the Braintree IDP. Mr McBride challenged BDC that the IDP was not fit as evidence for the BDC Local Plan; the response was 'yes it is'. However, that must be read it in conjunction with the Water Cycle Study produced by Anglian Water and the Integrated Water Management Strategy Stage 1. It is highly unreasonable for the LPA to expect the general public to do that before making informed comments as consultees on the Local Plan.

What WoB does feature though (aside from the rural landscape described briefly above) are;

- i. Grade 3 agricultural land which is of good to moderate quality and important to enabling the United Kingdom to produce more of its food.
- ii. Ancient Woodland – Boxted Wood
- iii. Heritage landscape – Humphrey Repton Garden

The latter two have been scarcely acknowledged by BDC in its plan-making.

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)**