

**PLANNING POLICY WORKING GROUP held at COUNCIL OFFICES
LONDON ROAD SAFFRON WALDEN on 23 AUGUST 2016 at 7.00pm**

Present: Councillor H Rolfe – Chairman
Councillors S Barker, A Dean, J Lodge, E Oliver and J Parry.

Officers in attendance: M Cox (Democratic Services Officer), R Fox (Planning Policy Team Leader), G Glenday (Assistant Director Planning) and S Wood (Planning and Housing Policy Manager).

PP16 APOLOGIES FOR ABSENCE AND DECLARATION OF INTERESTS

Apologies for absence were received from Councillors Davies, Loughlin and Mills.

Councillor Barker declared her interest as a member of ECC.

PP17 EMPLOYMENT LAND REVIEW

Simon Thurley and Dave Widger from consultants AECOM presented the Uttlesford Employment Land review update 2016. The study was a key part of the evidence base and this review assessed the quality and quantity of the existing supply of employment land and forecast the land and floorspace requirements to meet potential future demand. The presentation gave details of the approach taken, explained the difference between supply and demand and put forward recommendations to support employment growth.

Councillor Barker asked to what extent the scenarios had changed since the last report. She was advised that demand for employment space was broadly at the same level, although there was particular pressure for office space. The trend for a decrease in manufacturing and an increase in office employment was continuing.

Councillor Dean commented that housing should be jobs led, and asked if there was a geographical difference in the pressure for jobs, for example taking account of the influence of Cambridge. It was explained that this was a district wide study, which was in line with the requirement of the the Planning Policy guidance.

In answer to questions from Councillor Lodge, it was explained that the delay in receiving this report had been due to the need to clarify the relationship between jobs and housing growth. The call for sites information would be considered alongside the knowledge gained from the study and the emerging strategy would be brought to the meetings in October.

The report was NOTED as part of the Local Plan evidence base.

PP18 **MINUTES**

The minutes of the meetings held on 12 July and 19 July 2016 were signed by the Chairman as a correct record.

PP19 **BUSINESS ARISING**

(i) Minute PP12 – Project Plan

The Assistant Director Planning said a project manager had recently been appointed and work on the project plan was ongoing. A copy of the plan would be available at the next meeting.

Councillor Lodge mentioned a letter he had recently sent to the Leader of the Council, outlining his concerns about the Local Plan distribution strategy. It was agreed to attach a copy of the letter and the officers' reply to the minutes and include this as an item for the next meeting.

(ii) Minute PP13 – Duty to cooperate

Councillor Lodge asked if any duty to cooperate meetings had been held with South Cambs DC. Cllr Barker said that South Cambs proposed to deliver its own housing and was not looking for assistance from UDC. Meetings between the authorities would only be required if there was a proposal for a major development to the north of the district. However, officers were continuing to have discussions on cross boundary transport issues.

PP20 **THE CHESTERFORD NEIGHBOURHOOD PLAN – HISTORIC ENVIRONMENT ASSESSMENT AND LANDSCAPE ASSESSMENT**

The working group received two documents, the Historic Environment Assessment and Landscape Assessment, which had been commissioned by the Chesterfords Neighbourhood Plan Group to help inform the preparation of their Neighbourhood Plan. The group had asked the council to include the assessments in the evidence base documents for the Local Plan.

A letter from Bidwells, representing landowners within the Great Chesterford area was circulated at the meeting. This set out their comments on the assessment documents. There had been concern that the documents had not been subject to a public consultation process. Bidwells had also asked for it to be made clear that the assessments had been produced independently and therefore carried the same weight as representations received from a third party.

Councillor Dean expressed similar concerns, that the study had not been commissioned by the UDC and might therefore affect what should be a level playing field in determining site locations.

The Planning Policy Team Leader said the NPPF considered it good practise to take on board Neighbourhood Plan evidence. The council would also commission its own landscape work, so there would be an independent

reference point. Councillor Parry asked about the historic character assessments that had been carried out for a number of parishes in 2007. She was advised that these reports were still relevant, but the Chesterfords had wanted to commission additional studies as part of their Neighbourhood Plan.

The Chairman said the group was only noting the studies, similar to other Neighbourhood Plan documents. The letter from Bidwells would be kept on file and the Neighbourhood Plan itself would be subject to independent examination.

The working group NOTED the documents to be included in the Local Plan evidence base.

PP21

BRAINTREE LOCAL PLAN

The working group considered the proposed response to the Braintree Local Plan preferred options consultation. The document set out Braintree's emerging position in broad terms; there would be more detail in the local plan consultation document in December, The Council had submitted a holding response prior to discussion by this group and approval by Cabinet.

Mr Nick Buhenko-Smith spoke to the meeting on behalf of SERCLE (Stop the Erosion of Rural Communities in Essex). The group's main concern was the proposed new town, west of Braintree and the presumption that some of this development could be provided across the district boundary with Uttlesford. He questioned UDC's opinion on this point. A full copy of the statement is attached to these minutes.

In reply, the Chairman said that other authorities would not influence UDC's development decisions. However, Uttlesford had to provide 4600 new houses and it was a cross party Council decision that the development strategy would include the start of a new settlement. As UDC had few brownfield sites, it was inevitable that rural sites in the district would be developed. Members had not discussed specific locations, but any decisions on the recommended sites would be evidence based.

Councillor Dean said he was uncomfortable with the response to the consultation as it could be seen to be giving the amber light to this development. There was no caveat to say the council had not yet started to determine the site locations. He thought the response should be amended to reflect this and would speak to officers about the phraseology of the letter before it was referred to Cabinet.

The Assistant Director said the response only acknowledged Braintree's position. Officers were not yet in a position to recommend where the housing would be distributed across the district. In terms of the single settlement site, all options were still being considered.

Councillor Barker said that at a recent Duty to Cooperate meeting, officers from Braintree DC had confirmed that the 'west of Braintree' development would still be viable as a stand-alone option.

The working Group AGREED to note the proposed response and recommend that the Cabinet comment on the Braintree District Council preferred options document as set out in the appendix to the report

PP22 LOCAL PLAN CHAPTERS

The working group received three of the draft chapters for inclusion in the new Local Plan: Environmental Protection, Development in the Countryside, and the Historic Environment and Natural Environment. A further member workshop had been arranged for 31 August to discuss the development management policies. Councillor Lodge had a number of questions, but said he would raise these at the workshop.

PP23 LOCAL PLAN TIMETABLE

The Assistant Director Planning said he had recently met with DCLG to discuss the proposed project plan/timetable for the Local Plan. It was clear from that meeting that there was no flexibility with the deadline and UDC had to submit its Local Plan by the end of March 2017, to avoid the risk of Government intervention. He suggested the following timetable of meetings to the end of the year, which although tight, was achievable and the only way to meet the submission deadline.

In answer to Members questions, it was confirmed that the Transport Study would be sent to the working group members as soon as it was available. The Gypsy and Traveller plan would also form part of the documentation.

7 September	Member workshop
13 September	PPWG
September	Public exhibitions in Dunmow, Saffron Walden and Stansted
11 October	PPWG Workshop
25 October	PPWG
26 October	Cabinet
31 October	Scrutiny?
1 November	Full Council
2 November	Start of Reg 19 consultation

The meeting ended at 8.30pm

ACTION POINTS

PP19 Project Plan	To provide a copy of the project plan for the next meeting To attach Cllr Lodge's letter and officers' response to the minutes and include this as an agenda item for the next meeting.
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Minute PP19 – Letter from Councillor Lodge and Officer’s reply

Dear Howard

Planning Policy Working Group

Following the June and July Workshop, PPWG, Cabinet and Full Council decisions to adopt a Hybrid Strategy including a New Settlement, Officers have suggested a Distribution Strategy without evidence or serious analysis.

I am surprised then that this Strategy has since been distributed to towns and villages as an apparently finalised plan at this stage in the Local Plan preparation process. As you will be well aware, many of the key Evidence Studies are uncompleted, and indeed some of the key documents, such as the overall Transport Assessments, are at a very early stage of preparation. You will equally be well aware that no evidence has been put before the Planning Policy Working Group to justify any housing distribution strategy, nor have any alternative strategies been produced or considered by the PPWG.

Comment

I assume the reference here is to the letter of July 27th sent to all town and parish councils. The letter is not in any way prescriptive and makes it clear that officers are only suggesting the potential distribution of housing between towns/villages and new settlement(s) and not specifying any specific housing target for individual towns and villages. The fact that we are asking for suggestions for sites from town and parish councils shows that nothing is finalised.

The letter is clear that “the Council has yet to make a decision as to where these sites should be allocated” it continues “to provide some context, at this stage officers are considering that

The two towns of Saffron Walden and Great Dunmow could provide sites to deliver between 600 - 750 dwellings each.

There are 7 key villages, one of which is in the Green Belt, which could provide between 30-70 dwellings each.

There are 19 Type A villages some of which are in or on the edge of the Green Belt and some have no suitable sites submitted. Officers consider that the remaining Type A villages could provide between 10-20 dwellings each.”

Furthermore, “parishes must be aware that there has to be some flexibility in the distribution of these dwellings across the towns and villages” and finally “Your comments will be taken into account in the preparation of the Local Plan which will be subject to consultation and governance at UDC before finally being the subject of an independent examination.” None of this can possibly be construed as predetermining housing distribution across the District.

All very interesting, but the numbers are clearly highly indicative, and there is no evidence base to support them. Why have UDC put these numbers forward if they are totally theoretical? Of course it shows that UDC have made their conclusions now – and the letter says that is where officers currently are thinking.

There will be a full inclusive discussion and debate of all potential allocations and the new settlement at PPWG, Cabinet and Council. When? And why was this not done before these numbers were put out to the public. He doesn’t address the point at all about PPWG having been completely ignored in this process

As you will be well aware since the failure of the last draft Uttlesford Local Plan, all Local Plans need to satisfy the requirements of the NPPF and in particular be evidence-based and be the best option when considered against the reasonable alternatives. The last draft Local Plan failed because it was not evidence-led, but politically driven, there was no highways evidence to justify the proposal for large-scale housing at Elsenham, there was no evidence that acceptable highways proposals could make further building in Saffron Walden sustainable, and there was no proper audit trail to demonstrate that the spatial strategy was the best when compared against the reasonable alternatives. I would refer you to, for example, paragraphs 2.27, 3.6 and 3.10-3.12.

Comment

The new Plan will be evidence based. But it's clear that it won't be as these numbers have been put out without waiting for the evidence. There is a transportation study nearing completion. A sustainability appraisal was undertaken at issues and options stage – but that SA didn't consider any of these options - and further SA/SEA work has been commissioned – what work has been commissioned and when? What are the terms of reference? What alternative scenarios are being considered for the SA and how were they chosen? Why was the PPWG not consulted before any of this was considered? before decisions are made about the policies and proposals to be included in the draft Plan. Whilst the Inspector raised concerns about the transport implications of the Elsenham proposals he felt that there was a highways solution that could facilitate development at Saffron Walden. So this is here effectively confirming that we have predetermined that development will be in SW. This is completely improper. At this stage, UDC should be looking at the evidence to determine the most sustainable allocation overall; instead, it's clear from this it has been decided that SW will be developed, and is just looking for justification

You had assured the Council that a proper, open and transparent process, which would accord with the NPPF requirements, would be followed this time. Instead we appear to be repeating our mistakes. There is a large amount of evidence outstanding, no alternative spatial strategies have been considered except in the very broadest terms, of whether or not a new settlement should be included, and no comparative sustainability assessments have been produced.

Comment

The principle of a new settlement was considered and agreed by PPWG, Cabinet and Full Council on the basis of a full report. Five potential distribution options were also considered in open public forum. This doesn't answer the question. The 5 alternatives were incredibly broad, and there has been no discussion of the alternatives within Option 5 (ie new settlement and some development elsewhere)

Yet despite all of this, UDC has managed to produce a draft Spatial Strategy setting out in very clear detail its proposed housing distribution, the split between new settlement and existing settlement allocations, and even the detailed split between existing allocations. I would repeat that no evidence has been produced to the PPWG to support any of the allocations proposed in the July 27th draft strategy.

Quite apart from the lack of compliance with the NPPF, the issue of the July 27th draft strategy raises serious concerns about the way that the Planning Policy Working Group, which is in theory the UDC body charged with overseeing the preparation of the draft Local Plan, has been completely side-lined. Nothing in the July 27th document, beyond the proposal to consider the inclusion of at least one new settlement in the spatial strategy, has been put before the PPWG previously, nor have any alternatives been analysed.

Comment

See observations above. There will be a workshop and exhibitions in September to consider issues further. That's too late! The question has been ignored, and is just saying that there will be a public workshop once all has been decided

In terms of the outstanding evidence to support any Local Plan, I would note that much, if not the majority of supporting evidence has still not been received. In particular:

- There is no Air Quality study for the district, and no updated study in relation to the unlawful pollution levels in Saffron Walden. As you will be aware, the last study was produced in 2013, and predicted that air pollution levels would remain above legal limits and that the proposed housing allocations to Saffron Walden would worsen pollution, as indeed would ECC's proposed highway "improvements". That study noted that further work would be necessary. As far as I am aware, none has been carried out, and I have not even seen draft Terms of Reference for such a study being tabled at the PPWG. Given the AQMA covering the whole of central Saffron Walden and the increased pollution levels predicted by every new development, including those already approved by UDC, a concrete plan to reduce air pollution must be an absolute pre-requisite to any housing allocation in Saffron Walden. Yet the July 27th distribution proposes 600-750 new dwellings in Saffron Walden, without any air quality assessment whatsoever;

Comment

Up to date information on the current state of air quality in Uttlesford was published in June 2016 (2016 Air quality annual status report). It shows an improving picture, including in the AQMA in Saffron Walden. A further air quality assessment will be commissioned once site allocations begin to be identified. This will assess whether mitigation strategies are necessary to inform any plan policy requirements. The letter of July 27th does not "propose" new dwellings in Saffron Walden for the reasons set out in the first comment. Yes it does, it clearly states that officers are currently considering those allocations. The UDC proposals are the wrong way round. The AQA should be part of the evidence base to decide what is the most sustainable option. Instead, as last time, UDC are going to decide where to build and then use the AQA to mitigate

- There is no Employment Land Review. The PPWG has had no update on the status of the draft Review, and has seen no drafts of it. Nor is there any employment strategy, even in draft. As you know, paragraph 158 of the NPPF requires that the strategies for employment, housing and other uses in Local Plans are integrated. It should therefore be impossible to have a housing distribution strategy without first having an employment review and an employment strategy developed in tandem, and fully integrated with it;

Comment

The findings of the Employment Land Review will be presented to PPWG on 23 August. The Local Plan will align housing and employment strategies. So why have the officers already decided the allocation before this is done?

- There is no Infrastructure Assessment or Plan. As far as I am aware, there has been no consideration whatsoever of necessary or desirable infrastructure in connection with any new Local Plan. Nor was there any proper infrastructure plan with the failed draft Local Plan, so we have nothing even as a starting point;

Comment

Work has already been undertaken by Essex County Council to assess the infrastructure requirements of major development proposals. A full Infrastructure Development Plan has been commissioned that will build on this work, assess the infrastructure requirements of the proposals in the Plan and ensure that allocations are deliverable. When was it commissioned? What are its terms of reference and why were they not first presented to the PPWG? Again, this is too late – the Infrastructure Plan should inform the decision as to which allocations are most sustainable, not just be used once the allocation decision has been made

- There is no Highways Assessment and no Transport Assessment, and no comparative study of the respective transport merits of particular potential allocation sites. A Transport Assessment has been commissioned, but I understand that it has a very early stage, and that ECC Highways are still gathering the underlying evidence to be able to prepare modelling. Given that the 2013 draft Local Plan failed in part because of the impossibility of installing robust transport links for the proposed allocations in Elsenham and Saffron Walden, I find it surprising that UDC should again be putting forward a spatial strategy without transport evidence;

Comment

The Council has commissioned its own Transport Study which has undertaken an in depth analysis of various strategic development scenarios and strategic site allocations. When was it commissioned? What are its terms of reference and why were they not first presented to the PPWG? Its findings will be presented to the Member Workshop on 7 September and then PPWG on 13 September. Again, this is much too late – it should be part of the evidence base

- There is no updated Retail Study;

Comment

There is an updated retail study. We have preliminary findings and will present the final report to PPWG. Again - When was it commissioned? What are its terms of reference and why were they not first presented to the PPWG? How have the 27 July numbers been arrived at when it hasn't been completed?

- There is no updated Water Cycle Study. It is vital that such a study is available to feed into the plan and that it is robust. The previous Water Cycle Study was seriously flawed in that the Stage 1 outline study effectively dismissed various options but the more detailed Stage 2 study then included them as possibilities. Not only was that process nonsensical but it was effectively over-ridden by subsequent more detailed technical assessments which made the study meaningless. I have seen nothing new however for this draft Local Plan;

Comment

An updated Water Cycle study has been commissioned. It will be complete before the Plan is published. Again - When was it commissioned? What are its terms of reference and why were they not first presented to the PPWG? The new draft Local Plan preparation has been informed by the previous study. But that is out of date; this confirms that the new Plan isn't being informed by the updated study, but by the old one, in breach of the NPPF requirement to use up to date evidence

- There is no education strategy. As you know, education strategy has failed the district for the last 5 years, and the policy of encouraging distributed relatively small-scale development has exacerbated the lack of school places, and resulted in more and more restrictive catchment / priority admission areas, and increased the distances needed to travel to schools. The 27 June draft spatial strategy is not in any way that I am aware, integrated with any education strategy. The changes to s.106, prohibiting pooling from more than 5 developments, has meant an immediate drop in education contributions from developers. The current failure to plan for a CIL-based approach

would mean that any spatial strategy with significant amounts of distributed housing, as apparently currently favoured, would result in ever-increasing shortages of education contributions;

Comment

We have liaised closely with the County Council's Infrastructure Delivery Department throughout the preparation of the Plan. We have consulted with them on all potential site allocations to ascertain if there are any school capacity issues. That is not an education strategy. Where are the results of this and the ECC advice? Why has it never been put before the PPWG

- There are no Sustainability Assessments at all on any proposed spatial strategies. Indeed there are not even any reasonable alternatives to the 27 June draft spatial strategy on which to prepare a Sustainability Assessment.

Comment

See observations above relating to sustainability appraisals. Doesn't answer the question. What are the alternative strategies being considered?

I am sure that there is other outstanding evidence which I have missed. I also can't find amongst the documents previously submitted to the PPWG a comprehensive list of the studies which have been or are being prepared in connection with the Local Plan drafting.

In terms of the lack of alternative strategies, you should be well aware that paragraph 182 of the NPPF requires that "the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence". I have discussed above the lack of proportionate evidence. In terms of the July 27th distribution strategy being the most appropriate strategy, no reasonable alternatives have ever been considered by the PPWG, and nor as far as I am aware have they been considered by anyone else.

appropriate strategy, no reasonable alternatives have ever been considered by the PPWG, and nor as far as I am aware have they been considered by anyone else.

The presentation from Mr Fox of 12 July 2016 set out the need for UDC to plan for 12,500 new homes to be built in the period 2011 – 2033, of which some 2,468 have been built. That leaves just over 10,000 new homes to be built in the period from now to 2033. As the presentation states, 850 will be windfall allocations, 4,600 have already been given planning permission and roughly 4,600 remain to be allocated. All of the sites already allocated are in or adjacent to existing settlements, and I assume that substantially all of the windfall sites will be also. The July 27th draft strategy proposes an allocation of 2,800 new homes to one new settlement, and the remaining 1,800 new homes to existing settlements. Of the 10,000 new homes to be built in the period to 2033, UDC is therefore proposing that 7,200 are in existing settlements and 2,800 in a new settlement.

I have never seen any justification for this strategy, and I am not aware that one even exists. I have equally never seen any reasonable alternatives to this draft strategy, and again am not even aware that any exist. To give just a few obvious alternative scenarios:

- Why are 72% of new homes being allocated to existing settlements and 28% to a new settlement? Why not for example 50% to each, or some other proportions? Where is the comparative sustainability assessment of the alternatives?
- It is proposed that only 2,800 new homes are allocated to a new settlement in the next 17 years. UDC has consistently said that the absolute minimum housing allocation for a new settlement would be 3,000 new homes, at least in part to justify a new secondary school, and probably 4,000-

5,000. Why has UDC's approach changed suddenly, and where is the evidence to support it? Why does the new settlement option include a 2,800 allocation? Why not 3,000 or 3,500 or 4,000 or indeed any other number?

- Is there only one proposed new settlement? Previous proposals have suggested that a sustainable alternative would be to have 2 new settlements, for example one in the north of Uttlesford and one in the south, which could then be expanded in the next Plan period. Yet this does not appear even to have been considered?
- What drives the extremely blunt allocations between the larger towns and the smaller villages? They are very different from what was considered sustainable in the 2013 draft Local Plan, for no obvious reason?

Comment

See above observations regarding the distribution strategy. The potential 2,800 figure for a new settlement purely relates to the lifetime of the Plan. New settlements could continue to grow beyond that period to create the critical mass necessary to deliver the requisite physical and social infrastructure. No decision has been taken about how many new settlements there will be. Members will consider this in September/October.

Again, the questions effectively ignored – why have the officers put the numbers they have into the 27 July letter and not any others? If nothing has been determined, what is the basis for the SAs? They must consider potential scenarios, and the NPPF requires a comparative sustainability analysis of all the reasonable options, so has this yet been commissioned, and what options are being considered?

Clearly I could come up with other perfectly reasonable alternative scenarios. My aim is not to give an exhaustive list but to demonstrate that no such alternatives have ever been considered by the PPWG, no comparative sustainability work has ever been published, and as far as I am aware no alternatives have even been prepared. If I am wrong in any of this, I should be grateful if the Planning Team would provide the documents to me as a matter of urgency; I have copied Mr Fox into this letter, and would ask him to provide me with any such documents, or confirmation that no such analysis has yet been performed. If any such analysis has been prepared, please also provide the associated assessments of related impacts on, for example, education, health and transport impact and employment strategy.

Comment

See above observations. Completely ignores the question. Where is the analysis of other options

As I said at the start, I am disappointed that we have got to this position. I am writing to you now in good time before the next PPWG meeting, and ask that that meeting should as a matter of urgency:

- Consider the issues I have raised. I request that this letter be tabled as a formal agenda item, and that consideration of all the above issues be a major part of the meeting;
- Be given a detailed list of the evidence base which will support the Local Plan, with a description of which documents already exist, what evidence is still to be prepared, and the dates on which such evidence is expected to be received;

Comment

This can be provided for you. So why hasn't it already, and why has the PPWG been completely side-stepped?

- Be provided with a list of reasonable alternative spatial strategy scenarios, a detailed assessment of each, and details of which will be the subject of comparative sustainability assessments, and why, and the timescale for their production;

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Comment

See above observations. This doesn't address this question, as we've said repeatedly above

- I have repeatedly asked for a CIL timetable, consistently this has been delayed and at the last meeting the PPWG referred to historic UDC policy to retain a s.106 approach. Given that s.106 has been made consistently less attractive as the Government seeks to push councils to adopting CIL, and given that the NPPF specifically requires that where practicable (and in our case it presumably is), a CIL costing be prepared in conjunction with the draft Plan. I would have assumed that at least an outline CIL costing would have been an essential part of each alternative spatial strategy, so we can see what associated level of infrastructure could be provided. As we are all too well aware, the current spatial strategy has resulted in very little new infrastructure, and changes to s.106 have made the position worse;
- An explanation of how and why the July 27th was arrived at, and particularly why it was issued in the absence of so much supporting evidence;

Comment

See above commentary relating to July 27th letter. The above commentary gives no information on how the 27 July allocation was arrived at, what alternatives were considered and why it was arrived at in the absence of the evidence base

- An explanation as to why the PPWG appears to have been completely side-lined in relation to the draft spatial strategy.

Comment

The PPWG have been engaged fully to date in considering the evidence base and adopting a preferred distribution strategy. They haven't been involved in any of the reports above; they have had no evidence which would justify the 27 July allocation and they have seen no alternatives; they weren't consulted at all on the 27 July allocation. The Group will have a key role in contributing to the decision on specific site allocations and the location of a new settlement(s). ie they won't be involved at all on the spatial strategy

Throughout the functioning of the current PPWG we have struggled to get a sensible work plan and scope of work through to the final production of the Plan. With the current timetable we are in serious danger of failing to follow due process and hence give cause for the Inspector to fail our plan again. I feel that even though we are under pressure from government to deliver an early Plan, we now need to seriously consider delaying the timetable until we can be assured of that proper process. I would like to request this also as an item at the next PPWG.

Comment

At present we are on track to comply with the timetable set out in the Local Development Scheme. There are no reasons to deviate from it at this stage. Recent advice from Communities and Local Government is that we should continue with our current timetable, otherwise we risk being "blacklisted", put into special measures or have a plan imposed on us. It is therefore my view that although extremely challenging the current local plan timetable must be adhered to. The current timetable can only be adhered to if decisions are taken before the necessary evidence-base is compiled, which is what is happening

Minute PP21 - Braintree Local Plan – Statement by Mr Nick Buhaenko-Smith



Thank you for allowing me to speak at this session.

As an introduction, my name is Nick Buhaenko-Smith and I am resident of Uttlesford. I am also here as a representative of SERCLE (Stop the Erosion of Rural Communities in Essex).

To provide some background, SERCLE was established in summer 2016 and continues to steadily grow with support from residents from several parishes, on both sides of the UDC/BDC boundary.

Its primary objective is the opposition to BDC's presumption that a new town **WILL** be built at the "West of Braintree". One that crosses the district boundary into Uttlesford.

Even at this early stage, as an indication of our resolve and commitment, you may want to review the responses of residents in relation to this new town in BDC's local plan consultation.

Beyond those responses, SERCLE have also identified significant issues in BDC's commitment to this new town in areas such as non-adherence to UK and Local planning policies, and the principles of the TCPA.

It with these developing arguments and many others we have identified, along with support from external organisations, that SERCLE will seek to show this development is both inappropriate and unsustainable.

However, it with regard to BDC's presumptive attitude that I ask UDC for their opinions on the following 4 points:

- BDC are promoting this site as a certainty and have proposed a total number of houses of 13,000 with a significant portion in Uttlesford. Has BDC any grounds to make these claims on UDC's behalf?

www.facebook.com/sercle.org

- In the planning policy meeting dated 25th May 2016, the leader of the BDC stated with respect to the two proposed new towns in the Braintree district, and I quote:

"In respect to the two sites, I will be particularly interested in the one coming forward for West Braintree because the largest employer in the district is Stansted, and whether we like it or not, Stansted airport is not going to decrease, it isn't going to shrink, it's going to grow in size and it's going to become more and more a major employer for this part of the country, and wouldn't it make sense to developing housing to close to one of the major airports in this country. So I think it is well worth looking at West Essex."

- I, and maybe the council also infers from this quote, that BDC may be looking to meet it's housing requirements with this site but expecting Stansted to meet the employment requirements?
- Also given the proximity of the site to the UDC border and BDC expecting employment to head west, initially along the B1256, what is UDC's opinion to BDC shifting it's transport issues onto this council?
- Finally, if the council is aware of these issues and have been discussing with BDC why is there no publically available documents nor virtually no mention in any planning meetings? Given the statements from the council after the rejection of the last plan, surely the transparency on the topic of "duty to cooperate" is essential?