

## Address to PPWG 6 April 2017

I want to raise the apparent pre-determination by this Council of a spatial strategy long before the evidence base had been assembled, and the continued absence of the required Comparative Sustainability Assessment or prior consideration of any reasonable alternative spatial strategies as required by the NPPF.

The same issue arose with the draft Plan which was rejected in 2014 largely because the spatial strategy was politically driven, exemplified by the determination to push the Elsenham new settlement despite the contrary evidence. This Council appears to be adopting a similar approach of trying to fit the evidence to support a pre-determined strategy. In 2014 also the inspector was very sceptical about the Comparative Sustainability Process but did not need to decide the point.

The issue is compounded by the opacity of the Local Plan process. Virtually no significant decisions ever come to this Group and it is difficult to find evidence for decisions which are taken privately elsewhere. For a long time Cllr Lodge has been trying to get proper scrutiny of the Plan process by this Group, but with very limited success. Cllr Lodge has written at length asking for a number of key issues to be addressed at today's meeting, but the chair has refused to allow that letter or those issues to be discussed, which is why I wished to speak.

In June 2016 UDC published its preferred spatial strategy, proposing significant building in Saffron Walden and Dunmow, new settlements and limited other development. Most of the required evidence base was outstanding at that point and no explanation was ever given as to where that strategy came from or what reasonable alternatives were considered. Saffron Walden Town Council asked for an explanation 6 months ago and is still waiting.

Since then, no reasonable alternative spatial strategies have been proposed for discussion or presented to this Group. Nor has there been any Comparative Sustainability Assessment work and, looking at the Work Plans tabled for this meeting, nor is any intended – a comparison is proposed between the new settlements, but no Comparison of reasonable alternative strategies is even contemplated. This despite clear NPPF and PAS guidance. And we are now only a few months away from the draft Plan.

In the meantime:

- The Highways Assessment and the Water Cycle Study have been commissioned on the basis of the June 2016 preferred option, not on an open basis;
- Cllr Rolfe has announced to South Cambs his personal vision for a greater Saffron Walden;
- Work continues on trying to find a mitigation strategy for Saffron Walden development without any prior work to see whether such development is sustainable, and without the Council even assessing air quality or the impact on the historic environment of Saffron Walden of continued development;
- Most recently, in the current minutes, at PP42, Cllr Barker refers to a need for 4300 new homes in new settlements "if other allocations were met", so she certainly appears to have pre-decided on certain other allocations. I was not aware that any allocations had been decided

I urge you to change tack, adopt a transparent spatial strategy process which follows the evidence and avoid the risk of another Plan rejection.