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EXAMINATION OF THE NORTH ESSEX AUTHORITIES SECTION 1 PLAN

HEARING STATEMENT BY EDWARD GITTINS

The contents of this Hearing Statement are principally relevant to Matters 6, 7 & 8 in the Inspector's Matters, Issues and Questions

Foreword

1. I have been involved in Planning in Essex in various capacities for over 50 years in both the public and private sectors as summarised in the attached CV (Appendix ERG1). I am not instructed by any Clients or organisations and the views expressed in this Hearing Statement are therefore my own and are consistent with or relevant to the content of representations submitted at all previous iterations of the Plan. In dealing with Matters 6, 7 & 8 however, it is necessary to comment on the contents of the Issues and Options Reports for the three garden communities which, at the time of writing, are on consultation.

Submissions

2. Representations have been submitted by Edward Gittins & Associates relating to all three proposed garden communities but I now wish to elaborate on the process by which garden community sites were chosen and to comment on the promotion process following the publication of an Issues & Options Document for each proposed garden community. My concerns lead to a proposal that the 7,500 dwellings earmarked for delivery via the garden communities during the Plan period should be reallocated – leaving the garden communities to be promoted via their own DPD process to focus on post- 2033 growth.

The Process of Site Selection

3. The Colchester Issues and Options Consultation Document (January 2015) put forward 6 Growth Strategy Options – all of which included ‘a separate sustainable settlement’ (see

page 40). At that critical stage of the Plan-making process, alternative strategies which excluded a separate sustainable settlement had apparently already been discarded. There were, however, other reasonable strategic options which were never put forward and tested via public consultation. Whilst there is no requirement for local authorities to consider and test every conceivable strategy, a reasonable choice of options might be expected especially as the inclusion of garden communities as a recurring option represented a radical change from past growth strategies.

4. Options that did not feature in those on offer include focusing strategic growth on a ring of satellite dormitory villages surrounding Colchester which would fit well with the promotion of improved local public transport links to a major hub. Another related to the inclusion of smaller garden communities of up to 4,000 dwellings which could be developed during the Plan period, two of which were already being advanced at Langham and Frating (Tendring Central) but were rejected by Colchester and Tendring Councils respectively in favour of much larger garden community schemes. I therefore remain concerned that the choice of options has not only been unduly restricted but contrived in favour of large scale garden communities at the expense of other realistic alternative strategies.
5. The choice of location of the garden communities has also been arbitrary. The Colchester Braintree Borders scheme would involve a new town with an ultimate population of 55,000 being located almost conjoined with the suburban western edge of Colchester (ie: Stanway and Copford) – creating a large and almost continuous urban sprawl along the A12 and A120 corridors to the edge of the historic settlement of Coggeshall. This new town is unlikely to be self-contained but due to its proximity to Colchester, is likely to rely heavily on Colchester for many of its higher tier services.
6. The Tendring Colchester Borders garden community will breach the natural defensible limit to growth formed by the Salary Brook Valley and will create extensive urban sprawl pouring into open countryside. As discussed shortly, there are realistic and arguably more sustainable options involving the promotion of growth of the required scale being directed to key villages and to urban edge sites especially on the less sensitive northern and immediate western flanks of Colchester and/or in the form of much smaller garden communities.

7. With regard to the West of Braintree garden community, I refer shortly to particular concerns about shoe-horning a new settlement between existing line of settlements along the western section of the A120 corridor.

Issues and Options Reports

8. The timing of the publication and consultation on the Issues and Options Reports for the three garden communities suggests that the level of information in the public domain prior to this point has been inadequate to establish the principle of such developments. It is deeply worrying, therefore, that the Local Authorities have proceeded so far in their support for the principle of garden communities in advance of these Issues and Options documents - normally a necessary stage in the process before support for the principle is established.
9. Other matters of concern arise from the additional detail now being provided, particularly the concept plans - albeit they are non-binding and illustrative. The Current Development Concept Option (Section5) for the Colchester Braintree Borders garden community is presumptive of an as yet unknown commitment to an off-line route of the A12 at Marks Tey (in effect a new Marks Tey bypass), and the as yet undecided line of a future link between the A120 and A12. With regard to the latter, the latest and most optimistic forecast of the Deputy Leader of the County Council who is delegated to select the preferred route from 4 remaining options is that whichever route is selected it will not open until 2026. Additional to this link, a local link between the A120 and A12 is proposed in order to open up the housing land to deliver 2,500 dwellings by 2033. This local link, it is noted, must post-date the delivery of the major trunk road schemes and itself requires costly infrastructure in the form of new junctions on both the A12 and A120 as well as a railway crossing. In the face of such huge uncertainty as to alignment, funding and programming, the ability to deliver 2,500 houses within the Plan period must be in serious doubt.
10. With regard to the Tendring Colchester Border garden community, I consider the natural physical limit to Colchester's growth formed by the Salary Brook valley and incursion into the Tendring plateau should only be countenanced as a last resort. There are much less sensitive sites on the northern and western flanks of Colchester. There are also further serious issues relating to the near-coalescence of settlements and major traffic implications

in providing a link from the A120 into the already congested Hythe and eastern approaches with only a single river crossing.

11. With regard to the West of Braintree garden community, it is unclear as to the degree of collaboration that has taken place to promote this edge of District cross-border scheme or how this integrates with the separate emerging Uttlesford Local Plan which contains proposals for additional garden communities at Great Easton and Great Chesterford. This site is considered to have few natural attributes to justify its allocation as there is already an established and well-spaced 'beads on a necklace' settlement pattern along the A120 corridor, namely Bishops Stortford, Takeley, Great Dunmow, Rayne and Braintree.
12. My final point of concern relates to the administrative arrangements for delivering the garden communities and issues of viability. The current NEGC Ltd. is possibly to be replaced by a Development Corporation (see Issues and Options: Theme 3: Delivery) and this could radically alter the perspective of private promoters and landowners. Whilst the whole viability of garden communities relies on capturing land value, the additional powers available to Development Corporations could result in much higher levels of capture and intervention. That said, irrespective of the management and planning administration arrangements for the garden communities, there remains considerable doubt that the up front and subsequent investment in infrastructure can be borne by a combination of land value capture and public and private sector investments. The scale of these investments to meet the essential infrastructure costs will radically effect the level of residual land value and currently casts doubt on the viability and hence deliverability of the schemes.

Conclusions

13. Faced with the uncertainties and concerns identified in both my Hearing Statements, I consider it is vital to take stock of the situation now before irrevocable decisions are made which will have profound implications for the future of North Essex. That said, I am fully supportive of the level of housing provision being proposed and of garden communities in principle and accept that growth can only be absorbed in North Essex through the release of extensive tracts of greenfield land.

14. I do not accept, however, that large scale garden communities have been shown to represent acceptable or necessarily the most sustainable form of delivering future housing, employment and other land use requirements. Garden communities are voracious in terms of the loss of countryside, causing extensive planning blight over a much longer period than more standard forms of development, whilst I harbour serious doubts they will be sufficiently self-contained and ultimately will perpetuate and exacerbate the already unsustainable characteristics of existing towns and villages in North Essex. There are also massive uncertainties surrounding the programming of trunk road improvement schemes and the ability to afford and deliver such large scale garden communities as and when envisaged. These uncertainties suggest to me that it is highly speculative to imagine they can deliver 7,500 dwellings by 2033.
15. I consider a great deal more work and consultation is required before committing finally to specific large scale garden community schemes but that if they are to remain active projects, the focus of such schemes should instead be to provide for longer term growth after 2033. I therefore advocate that any further work on garden communities should be in the form of a separately prepared DPD or DPDs. This approach would, however, require the need to find sites or general areas to accommodate 7,500 dwellings. This need not, in my view, significantly affect the timescale for adoption of the Local Plans as all three Districts are still to deal separately with their Section 2 Plans whilst the evidence base contains many sites which could be speedily revisited. Work on amendments to the Joint Strategic Plan, which could involve the identification of other strategic policies and sites, could take place contemporaneously with further work relating to the consideration of non-strategic policies and sites in the Section 2 Plans.
16. I therefore respectfully request that active consideration be given to the grounds cited above for regarding the Joint Strategic Plan as being unsound. I nevertheless wonder that, if there is support for a review of the inclusion of large scale garden communities in the Plan at this stage, an opportunity might be given to the three Councils to reconsider their position in relation to the garden community schemes - or at least the elements which envisage 7,500 dwellings being delivered by 2033. A moratorium would provide an opportunity for them to come forward with proposed key amendments to their Joint Strategic Plan – with the Examination possibly being adjourned and reconvened as soon as possible to enable this to happen.

A handwritten signature in black ink, appearing to read "Edward Gittins", enclosed in a light gray rectangular box.

Edward Gittins

Chartered Town Planner

December 2017

Appendix ERG1

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PRACTICE NOTE

EDWARD ROBERT GITTINS BA (Hons). Dip. TP. FRTPI is a Chartered Town Planner and Director of Edward Gittins & Associates, a firm of Planning & Development Consultants based at Cavendish near Sudbury.

Born and educated in Wales, he went on to obtain a BA Honours Degree in Geography from the University of Liverpool, a Postgraduate Certificate in Education from the University of London, and a Postgraduate Diploma in Town Planning from the Regent Street Polytechnic, London. He was elected a Fellow of the Royal Town Planning Institute in 1986.

He founded his Planning Consultancy in 1991 and specialises in Housing Site Identification, Development Potential Surveys and Environmental Assessment, Planning Appeal and Enforcement cases, Planning Applications, and Development Plan and Policy matters. The client base ranges from nationally-known volume builders to small firms, organisations, and private individuals.

He was first employed in the Planning Department of Essex County Council before taking up a Lectureship in Rural & Natural Resource Planning at the Polytechnic of the South Bank, London. He rejoined Essex County Council as Head of the North East Essex Local Plans Section. He was then appointed Head of Local Plans for Colchester Borough Council and oversaw the production of the first Colchester Borough Local Plan and Colchester Central Area Local Plan. He appeared for the Council at Local Plan and major Appeal Inquiries, promoted the production of Development & Design Briefs, and was active in the work of the Planning Department in conservation projects, particularly in the Dedham Vale AONB and the Roman River Valley Countryside Conservation Area.

He has been active in Environmental Education and is a former Chairman of the influential RTPI Accreditation Panel which accredits all recognised planning courses in the UK, Eire, Malaysia and Hong Kong. He also formerly served as External Examiner for the Postgraduate Courses at the University of Nottingham. He is Honorary Consultant Planner to the Inland Waterways Association and a former member of its Restoration Committee. He is also Honorary Planning Advisor to the Essex Playing Fields Association, a Friend of the Montgomery Canal, and a Member of the Wrexham Supporters' Trust.