



North Essex Authorities (NEAs) Section One Shared Strategic Plan

Community Engagement Statement

December 2019

1 A short summary of the issues

Introduction

- 1.1 In his Matters, Issues and Questions (ref: IED/019) the Inspector asked the NEAs to respond to the concerns raised by participants regarding community engagement. The NEAs believe that it has carried out the public consultation in a fair and consistent manner in line with the relevant guidance and each Local Authority Statement of Community Involvement (SCI), in addition the NEAs corresponded with the Inspector during the preparation phase of the consultation engagement.
- 1.2 The work which informed and resulted in the Technical Consultation was undertaken in response to the Inspector's comments in his letter of 8 June 2018. This further work is not a prescribed step covered by The Town and Country (Local Planning) (England) Regulations 2012. The NEAs have nevertheless followed their respective Statements of Community Involvement when consulting on that work and utilised the same processes and systems as used for their statutory Local Plan consultations to ensure there is a level of consistency amongst the consultations. The details of the public consultation carried out in August 2019 is detailed in the authority's Consultation Statement Addendums (EB006) and can be summarised as below:
- Consultation on the documents took place for a full 6 week period between the 19th August and 30th September 2019. Whilst there is no statutory requirement to do so, the Councils followed the Inspectors advice and included within the 6 week consultation period 4 clear weeks in September for the consultation.
 - A consultation website and consultation portal were set up where the consultation materials could be viewed and consultation responses inputted directly onto the system. Downloadable consultation forms were also available to be returned electronically or in hard copy.
 - Direct correspondence was issued to all stakeholders and members of the public who are on the Council's consultation list (i.e. those who had responded to the previous consultation or had asked to be kept informed)
 - Direct correspondence was issued to all statutory consultees
 - Notification leaflets were distributed to all households in Braintree and Colchester advising them of the consultation and how to respond.
 - Tendring produced press releases and notified residents through regular media channels
 - The consultation was advertised in the printed press, social media and on the local authority websites
 - Documents were available in hard copy at each Council offices and in other key locations across the Districts

Concerns raised by participants

- 1.3 The objectors concerns on community engagement focus on these broad themes:
- That the consultation was too technical and hard to understand
 - The online consultation portal was difficult to use.
 - During the consultation period there was little or no community engagement
 - It is inappropriate to hold a public consultation during the summer holidays.
- 1.4 Regarding these criticisms, the NEAs appreciate that a technical consultation can be difficult for members of the public to understand. However an evidence base consultation is inevitably going to be highly specialised and detailed, particularly on topics such as viability or sustainability appraisal. The NEAs took steps to make the material accessible to members. The NEAs summarised the purpose and content of the technical consultation through the Local Plan leaflet Summer 2019 (see EB006b) which included a description of each consultation document. This leaflet was mailed to all households in Braintree and Colchester to draw attention to this public consultation and to respond appropriately to the leafletting campaigns known to be undertaken by objectors in the Braintree and Colchester areas. It was accompanied by a full marketing campaign, including advertising through social media, press notices and advertising in each of the three authorities. For Tendring, which was not the subject of a leafletting campaign from objectors, leaflets were not distributed to households, but the consultation was promoted through the other channels above.

- 1.5 Due to the technical nature and substance of the consultation material, it did not lend itself to rounds of iterative engagement with members of the public. The six week public consultation from 19th August to 30th September 2019 was the most appropriate opportunity for public engagement to occur on the technical evidence production.
- 1.6 All participants were invited to comment using the link provided on consultation publicity materials (<https://braintree.objective.co.uk/portal/nea/s1tech/>). This led to the consultation portal landing page which set out the documents which were the subject of the consultation were set out in a single list. An extract showing the layout is provided at Appendix 1.
- 1.7 This page included at the top of the page a link to the inspector's examination note (IED/016). This note sets out the background to the public consultation. A summary of the background was also provided at the top of the page.
- 1.8 Guidance notes on how to use the system were available from the beginning of the consultation, and advised people to ring the office if there were any issues. During the consultation period, officers answered a number of queries over the phone and by email and also via social media, although the exact number has not been monitored. Downloadable consultation forms and responses via email and letter were also accepted. As a result there were a variety of mediums through which members of the public could respond.
- 1.9 Several comments were related to the perceived lack of engagement from the local authorities, the authorities have undertaken consultation in line with their respective SCIs throughout this process and do not accept that there has been no engagement. The Inspector stated in his letter IED/011 paragraph 28 "*I find no evidence that the NEAs failed to consult on the Plan in accordance with their Statements of Community Involvement, as required by section 19(3) of the 2004 Act*"
- 1.10 Some criticisms were levelled at the consultation period being held over the summer holidays. The technical consultation period ran for 6 weeks including the entirety of September, most of which is outside the holiday period.
- 1.11 The points raised by respondents are set out below;

Respondent	Summary of Comment	Response
Marks Tey Parish Council, SA 147	A request is made for strong community engagement and support which has not happened. Apart from involvement in the SA scoping exercise no such engagement has taken place, the final indignation being finding out about the HIF bid and possible A12 route through Marks Tey via the press.	The HIF funding announcement and A12 J19-J25 widening fall under the authority of Highways England. The Councils were therefore not able to share any information with Marks Tey PC ahead of any formal announcement by them. The HIF bid is an Essex County Council proposal and similarly the NEAs could not share any information with Marks Tey PC ahead of a formal announcement.
Marks Tey Parish Council, SA 147	With Marks Tey proposed as an integral first part of the new Colchester/Braintree Borders Garden Community this lack of communication and the reduction of infrastructure provision must give grave concern whether any of the future proposals within the Local Plan will similarly have reduced levels of consultation or infrastructure provision.	A detailed programme of community engagement will be undertaken as part of the DPD process. This will include continued engagement with Parish Councils on a formal consultation basis and an informal engagement basis.
RICHARD AGGISS, SA 115	The lack of engagement, the failure of Essex County council, its individual councillors and BDC Local Councillors to	The authorities have undertaken consultation in line with their respective SCIs throughout this process and do not accept that there has been no engagement. The

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	<p>engage on to answer our Communities concerns about this plan unacceptable.</p> <p>There has been NO engagement. There has been no attempt to outline the grand plan for macro economic growth.</p>	<p>Inspector stated in his letter IED/011 paragraph 28 <i>"I find no evidence that the NEAs failed to consult on the Plan in accordance with their Statements of Community Involvement, as required by section 19(3) of the 2004 Act"</i></p>
<p>Coggeshall Parish Council, SA20</p>	<p>The portal contains a collection of documents with no navigation, no explanation and it seems designed to discourage responses.</p>	<p>The link provided on consultation publicity materials (https://braintree.objective.co.uk/portal/nea/s1tech/) led to the consultation portal landing page. The portal is run by Objective Online software who provide a large number of local authorities with Local Plan consultation portals. This is the same system used by the NEAs during the last round of consultation on the Local Plan and used by Braintree and Tendring throughout the Local Plan process.</p> <p>The documents which were the subject of the consultation were set out in a single list. An extract showing the layout is provided at Appendix 1.</p> <p>This page included at the top of the page a link to the inspector's examination note (IED/016). This note sets out the background to the public consultation. A summary of the background was also provided at the top of the page.</p> <p>The consultation portal includes a site tour video and help section to guide people through using the system. Contact details were provided for those who wished to seek advice from officers in the team and calls were received and dealt with.</p> <p>Downloadable consultation forms and responses via email and letter were also accepted as valid consultation methods.</p>
<p>Cause, SA129</p>	<p>Consultation portal. The consultation portal is impenetrable to anyone not aware of the intricacies of the NEGC project. The following quotes sum it up:</p> <p>Pat Marsden, "I have visited your [the council] web site with the intention of making a response. It is impossible. You cannot expect ordinary people or even highly educated people to wade their way through the technical and complex verbiage on this user unfriendly site." She added, "Therefore I am completely opposed to this amended version of Section 1 as I was for the original version. I mean they can't even get the consultations right. There is a choice</p>	<p>See above. The Technical Consultation was in respect of the specific documents which comprised the further evidence base work. Therefore responses were invited in relation to the individual documents, rather than generally on matters of principle.</p> <p>The NEAs note that notwithstanding the comments regarding the lack of a user friendly portal, a large number of responses (over 40%) were submitted online. The remaining were received by a mixture of email and post.</p>

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	<p>between a jolly colourful leaflet describing the benefits of the Local Plan which can only be described as misleading propaganda, combined with a ghastly and unfriendly consultation site which is almost impossible to follow. This is not in any meaningful sense of the word an appropriate consultation.”</p> <p>Penny Lang, “Consultation online: impenetrable, and unbelievably time-consuming to other than qualified planners I suspect. There really should be a user-friendly option. That there isn’t, a cynic might suggest, was a deliberate ploy to avoid too many objections... (this goes against GC principles where local cooperation is advocated). We are lucky to have Cause prepared to submit for us.”</p> <p>Graham Dalby, “I’ve just commented via the BDC portal, but it’s frustrating that all comments have to be separated out and applied to specific amendments/paragraphs within the document. I couldn’t see anywhere to post general comments (objections) to the proposals as a whole.”</p>	
RAYNE PARISH COUNCIL, SA223	<p>People using the online portal, (once they can find it, as we have had reports that even finding the consultation is difficult) are required to have a login before even writing a word. Users then must choose which document they are going to comment on. The online portal is just not user friendly.</p>	<p>See above. Users who have previously used the consultation system are able to use the same log in as previously.</p>
MISS Kim Waterhouse, SA220	<p>I found it virtually impossible to use the online planning portal to express my concerns and I believe it has been made as incomprehensible as possible in order to deter the public from responding. It is for this reason I am writing this letter. I am unable to scan and email the Response Form as provided to me.</p> <p>There has been virtually no consultation with members of the public over the Plan and I believe this is because the council is simply not interested in our opinion, despite the fact we will be the ones footing the bill for what amounts to a very badly prepared ‘day dream’ vision that is totally unsustainable and unachievable and will ruin the area in which I live forever. The Council has does absolutely nothing to explain their ‘day dream’ to the public – virtually no information has been provided at all.</p>	<p>See above</p>
Mr Neil Gilbranch, SA24	<p>As a result of the lack of engagement, other than a leaflet delivered to households which seeks to justify the decision to progress with</p>	<p>See above</p>

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	the original Garden Community Strategic sites, it has become more difficult to find information in order to make comments on this latest consultation.	
Mr John Lindsay, Sa183	Furthermore, the way in which this consultation and previous consultations have been carried out is highly inaccessible to the public. The portal contains a collection of documents, with no navigation, no explanation and it seems designed to discourage responses.	See above
Matthew O'Connell, SA267	Beyond the ASA Methodology Scoping consultation, in relation to which the points raised were for the most part dismissed, there has been no constructive engagement with local communities throughout this stage of the plan, and it will - we believe - be clear to the Inspector that the plan lacks acceptance derived locally.	See above
Mark East	There is a choice between a jolly colourful leaflet describing the benefits of the Local Plan which can only be described as misleading propaganda, combined with a ghastly and unfriendly consultation site which is almost impossible to follow. This is not in any meaningful sense of the word an appropriate consultation.	See above
Matthew O'Connell, SA267	There were no community engagement sessions during the Plan technical consultation period. In relation to WOB, the community feeling of the inadequacy of this approach was such that the Salings Parish Council, supported by a number of unpaid volunteers, set up and staffed an ongoing engagement centre in Great Saling ("WOB Library"), which was very well attended and which as a result of widespread requests also became mobile to various other villages.	See above
Coggeshall Parish Council, SA20	In addition, CPC wish to formally comment on the promotional campaign that has been started by NEGC Ltd during the official consultation period.	NEGC Ltd undertook some engagement on the Garden Communities more generally in October and November 2019 which included a number of public exhibitions, invitee workshops and interviews with individual stakeholders. That engagement was undertaken by NEGC Ltd in its capacity as site promoter, and not the local authorities.
Cause, SA129	NEGC LTD planned extra engagement, autumn 2019. NEGC Ltd has announced, as we write responses to the NEA's consultation, that they propose an additional engagement programme from October. Therefore, before the ink is dry on this one, and certainly before Examination of the Further Evidence, NEGC Ltd wishes to seek input into the design of three unpopular new towns as yet not found sound. Any reasonable observer would surely conclude	Colchester Borough Council has already responded to comments raised by CAUSE regarding the NEGC Ltd consultation directly. As noted previously, the NEAs and NEGC Ltd have separate and distinct roles. The NEAs are the local planning authorities with statutory plan-making powers. The engagement work referred to was undertaken by NEGC Ltd as a potential deliverer of the garden communities and is

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	that this demonstrates pre-determination. Certainly it is a waste of tax-payers' money and extremely confusing to residents. It does not lend one to believe that any, let alone 'conscientious' consideration, will be given to what respondents say in the current consultation.	not part of any Local Plan consultation process.
Matthew O'Connell, SA267	There has been an announcement that NEGC Ltd, an entity funded by the Councils, would be holding engagement sessions, but that these would be after the Plan Consultation period.	See above
Cllr Nick Unsworth, SA269	It was abundantly clear during these events {note refers to sessions organised by a private group} that:- a. There was significant confusion regarding the consultation b. The portal provided by BDC was too complicated c. There was little of no engagement from BDC d. There was little or no engagement from the NEA or NEGC during the consultation	a. see above b. see above c. see above d. The NEA set out above the steps they took to publicise the technical consultation and consider that these were appropriate. NEGC are not the local planning authority and therefore would not be involved in the formal consultation.
Cause, SA129	Nothing could be further from the truth about the behaviour of the NEA's, and we set out reasons below. In the year since letter IED011, a multitude of concerns have been raised with the authorities. A consultation about the methodology to be used for the SA was held, as was a workshop, but nothing substantive was changed, and everyone following the process has been convinced that the result was predetermined.	The Councils have approached the construction of the evidence base with a suitably open mind. The Inspectors letter noted IED/014 paragraph 6 that the approach taken by the NEAs; " <i>indicates that the NEAs are approaching the necessary further work on the SA and the evidence base with an appropriately open mind and without preconceptions as to the outcome</i> "
Cause, SA129	In north Essex, communities are similarly confused by the endless rounds of consultation, particularly given the need to engage with four district councils (Braintree, Colchester, Tendring & Uttlesford), two Examinations, and to some extent Essex County Council, with the added complication of North Essex Garden Communities Ltd. We note that, inexplicably, NEGC Ltd wishes to run its own 'engagement', before the ink is dry on the NEA's consultation.	The NEAs have carried out the necessary consultation on the Local Plan including three rounds of public consultation on the Local Plan and a further public consultation on the SA methodology and evidence base required by the Planning Inspector. Uttlesford District Council are preparing their own separate Local Plan and are required to undertake a similar process. The statutorily prescribed plan-making process entails several rounds of consultation.
Cause, SA129	CAUSE was aware that the NEA's consultation would be impenetrable, technical and off-putting (and we note that the NEA's decided not to host drop-in events precisely because the consultation is technical!). We have indeed received many comments that the council portal is 'impossible' and 'technical'.	We appreciate that a technical document can be difficult to understand however it is the nature of an evidence base consultation to be specialised. The NEAs have summarised the purpose and content of the technical consultation through the Local Plan leaflet Summer 2019 which was mailed to households in Braintree and Colchester and contact details were available for any stakeholder or member of the public who

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		wished to discuss the consultation with officers.
Cause, SA129	<p>The NPPF 2012, in paragraph 155, says, <i>“Early and meaningful engagement and collaboration...is essential.”</i>, and that Local Plans should, <i>“as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area.”</i></p> <p>There has been nothing meaningful or collaborative about the process of creating the Section 1 Plan over the past five years, nor does it reflect a collective vision. Worse, members of the public have been treated with contempt, time and time again, at council meetings, and legitimate concerns ignored. Never are points raised in consultation responses addressed.</p>	See the response to SA/115 above on the findings of the Inspector on the Local Plan process.
Cause, SA129	Laughably, the council leaflet to all households listed the number of responses to consultations, but made no reference to what those respondents said. Here’s how the Essex County Standard summed up one of those consultations, on November 4, 2016: 1,884 object.	It would be impossible to properly summarise responses from all consultees in a short public facing leaflet. However links to the consultation portal where all responses were set out in full for anyone to read remain online.
Cause, SA129	The NEGCs are, of course, being proposed as ‘garden communities’. TCPA garden city principles require community engagement, as do the NEGC principles, under Principle 7 ‘Community Engagement’. For residents of north Essex, engagement has meant obfuscation, deflection, refusal to address issues, ‘stakeholder’ meetings in which people are told to ignore whether they like a proposal or not and put 20,000 houses on a map, inaccurate (housing numbers at West Tey presented as 1,150 homes) or missing information (half a map, redacted documents, missing documents). The list is endless. Residents know that their opinion does not matter. In fact, we have often been told that our opinions do not count because we will be dead when the new towns are built.	The NEAs recognise that that community engagement is a TCPA garden city principle. If the Garden Communities are to be taken forward a detailed programme of engagement, consultation and community involvement are proposed as part of the DPD process to ensure that members of the public can meaningfully input into the DPD preparation.
Cause, SA129	<p>Lack of information on alternatives. The council leaflet (Appendix 2 below) delivered to all households in Braintree & Tendring does not present alternatives in a clear and unbiased manner. A brief look at the conclusions of some of the previous high court cases where this was tested shows that the presentation of alternatives does matter:</p> <p>1. Heard v Broadland: Examine reasonable alternatives in same depth as preferred option; Test whether what may start out as</p>	The leaflet sent to all households in Braintree (as appended to the CAUSE response) was intended to be a factual summary of the work undertaken to date and the current contents of the Local Plan. It was not intended to present alternative scenarios to growth. The reasonable alternatives were tested as part of the Additional Sustainability Appraisal, upon which members of the public were invited to comment.

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	<p>preferred should still end up as preferred after a fair & public analysis of what the authority regarded as reasonable alternatives</p> <p>2. Moseley v Haringey: Consultation leaflet did not recognise there were other options. Readers presented with an assumption; Product of consultation must be conscientiously taken into account</p> <p>3. Save Historic Newmarket: Article 5 Directive: accurate picture of what reasonable alternatives there are and why not considered to be best option. Not possible for consultees to know from report what were reasons for rejecting any alternatives or to know why the increase in residential development made no difference.</p> <p>4. Medway v SOS: fairness requires that interested persons be consulted not only upon preferred option but also upon arguable yet discarded alternative options</p> <p>5. Greenpeace v Secretary for Trade & Industry: Consultation process was procedurally flawed & therefore decision unlawful. Consultees not given enough information to make an intelligent response. Aarhus Convention – improved public participation = better decisions / improved accountability & transparency to strengthen public support for decisions.</p>	
Cause, SA129	<p>Further evidence consultation once again rushed out over the summer. Only six weeks, requests for extension refused. Community groups have, in that short space of time, had to read, analyse and absorb 2,000 pages of highly technical and complicated evidence; arrange local engagement programmes to fill the gap where the authorities are not engaging, and write complex and lengthy consultation responses. THREE NEW TOWNS should merit far greater time for consideration and response.</p>	<p>The consultation period was held for a full 6 week period - the same time as for a regulation 19 consultation.</p> <p>Additionally it should be noted that the documents were published as early as June as part of the various approval processes for the individual authorities.</p>
Cause, SA129	<p>Over 1500 residents asked CAUSE to represent them in these submissions and at the Hearings in 2018.</p> <ul style="list-style-type: none"> • 8,500 people signed a petition saying no to West Tey; • 85 people volunteered to deliver 25,000 leaflets for CAUSE summer 	<p>The political situation is noted. The three local authorities all made decisions to continue with the Local Plan.</p>

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	<p>2019, across a huge area of north Essex.</p> <ul style="list-style-type: none"> • Feedback from the leafleting team was that those who are aware of the new towns oppose them nearly universally and that a significant number of people are still unaware of the proposals. • CAUSE has held numerous public meetings since 2015, including during the summer 2019 consultation. There is widespread opposition to the NEGCs. • The local election results in May 2019 were driven by garden communities. In the area between Braintree & Coggeshall, where there are five 'garden communities' proposed there is now not a single councillor who supports the garden communities. <p>25 parish councils and groups supported a motion proposed by Braintree's Green & Independent Group on 1 August to revert to Inspector's Option 1, allowing Section 2 to proceed to Examination. It is likely that many more would have signed but debate about the NEGC's was rushed through over the summer and many parish councils were unable to respond in time. See letter in Appendix 3.</p>	
<p>Cause, SA129</p>	<p>NEA promotional website & flyers, MIPIM UK. In Autumn 2018, just as the authorities were supposedly looking at alternatives for long term strategic growth following IED011, they simultaneously produced a promotional website and accompanying flyers, to support their attendance at MIPIM UK:</p> <ul style="list-style-type: none"> <input type="checkbox"/> "North Essex Opportunity partners comprise Essex, Colchester, Braintree, Tendring and Uttlesford Councils who are all uniting at the MIPIM Event together with North Essex Garden Communities Ltd..." <input type="checkbox"/> Potential investors learn that, "Five distinct and highly desirable new garden communities will be created." The accompanying map shows the same three NEA sites being promoted to investors as a 'done deal'. <p>Any reasonable member of the public or business viewing the North Essex Opportunity website would be left with the impression, as were we, that the</p>	<p>Officers producing the SA and the appointed independent SA consultants were not involved in the MIPIM event which was promoting the potential growth set out in the Local Plan. It was made quite clear to anyone attending the event that these were Local Plan proposals</p>

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	authorities are not approaching the process of reviewing alternatives with an open mind.	
Mrs S Osborne, SA231	I found this consultation very difficult to navigate. I will be sending in 2 emails as part of my response.	This response was acceptable and officers were able to carryout the back office tasks to integrate the response into Objective.
Caroline and Louise Ratcliff of Saling Grove, SA250	We would also question the effectiveness of the consultation process for the most recent documents. We went to the Braintree Library at the start of the public consultation and found the shelf of BDC consultation documents, unmanned, confusing and impenetrable to local people. Public awareness of the issues and consequences of this scale of house building has been almost non-existent with no effort from NEA to go and engage with the local communities.	The documents were placed on deposit at Braintree Library in accordance with the SCI. Contact details were provided for members of the public to speak directly with planning officers.
THE SALINGS PARISH COUNCIL, SA233	Community engagement during this phase has been so poor that SPC and local people have been compelled to set up its own engagement programme (WOB Library; www.woblibrary.com).	All documents available for consultation together with guidance notes from the Inspector on the purpose of the examination were published on the consultation website and were available at various deposit points across the North Essex area.
RAYNE PARISH COUNCIL, SA223	The Parish Council has been horrified in how the District Council have approached the consultation of the new documentation. Yes, they have probably legally covered what they need to do, by having the documentation on their website and having it on a shelf in the local library and leaflet dropping to households across the district. But do people actually know what the consultation is about. Do they know what they need to do?	We have summarised the purpose and content of the technical consultation through the Local Plan leaflet Summer 2019 which was mailed to all households in Braintree and Colchester. The Inspector published a guidance note on the consultation which was also published and circulated directly to all those on the consultation mailing lists and available on the website.
RAYNE PARISH COUNCIL, SA223	The actual process of filling in a response, either by paper or online, to the consultation is difficult, complicated and will put many people off commenting. The District Council will talk about the 'silent majority' that are in favour of such developments, which will be wrong as it will be down to people being put off by such processes.	We appreciate that technical consultation is by its nature specialised. The NEAs have summarised the purpose and content of the technical consultation through the Local Plan leaflet Summer 2019 which was mailed to households. It is worth noting that the overall number of responses received was 1,001. A very substantial number for a technical consultation.
RAYNE PARISH COUNCIL, SA223	We were disappointed that the District Council would not be carrying out any roadshows to aid the public, and have even stated that there will be no public engagement events due to the documentation being too technical, so we, along with other Parishes, have worked tirelessly to notify and help as many residents as possible to understand what is happening and give them an understanding on how they can respond. It is wrong that we must do this.	The latest consultation was on a series of technical documents on behalf of the Inspector and as such and in line with other similar consultations (for example the recent UDC additional consultation) no formal engagement events were organised. Documents were available to read at various deposit point and any member of the public was able to ring or email the NEAs for advice or discussion.

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RAYNE PARISH COUNCIL, SA223	It should be the responsibility of the District Council to ensure the 'Silent Majority' is heard and understand what is required.	A full marketing campaign, including advertising through social media, press notices and advertising was undertaken. In addition a special edition of the Council's magazine, "Contact" was sent to every household in Braintree and Colchester Please see the Consultation Statement addendums EB006a for further details.
Cllr Mrs J C Beavis, SA235	There has been no public engagement with the residents of this district on a human level. The residents of this district has been ignored and prevented from being allowed a face to face opportunity with the planning professionals at Braintree District Council. Residents have been told that the evidence is too technical. This is a nonsense and a Complete lack of understanding about the intelligence of the residents of this district. The Statement of Community Involvement and the Duty to Cooperate has been disregarded.	Officers were available to help residents at the Council offices throughout the consultation period and over the phone. Each NEA Statement of Community Involvement has been compiled with. The Duty to Co-operate does not relate to residents.
CPRE, SA228	The better solution is to allow the district-level (Section 2) Local Plans to proceed and to take stock about the longer term, in a process that involves true engagement with local residents, rather than imposing unnecessary and unpopular large-scale new settlements in greenfield locations.	Issues and Options and draft Local Plan consultations were held during the production of the plan giving residents a chance to engage the NEAs on spatial strategy. It would be counter-productive to revisit the overall strategy again and again.
Mrs Diane Greenwood, SA206	I should also like to register my opinion that Braintree District Council seems to have gone out of its way to make it difficult for people to engage and comment. From different email addresses given out by BDC to send your response to; the lack of public engagement by BDC to help explain and highlight the issues involved (no "roadshows this time round from BDC, just a couple of folders on a shelf at Braintree Library); to the very great difficulty of filling in the response form online. Many friends and neighbours have commented that it was very difficult to register their response (or even make one) and that it was very off putting. Some even went so far as to say that they felt it was a deliberate ploy to discourage people from engaging with the consultation. The process is indeed very difficult and BDC have made no effort to help people to make their feelings known.	Our publications have consistently used the email address localplan@braintree.gov.uk during the consultation. All email addresses were monitored by officers and no responses are believed to have been missed. All emailed and written responses received during the consultation period have all been accepted. The online consultation portal Objective has been used by Braintree and Tendring Councils since the beginning of the Local Plan process in 2015 and by all the NEAs for the SA methodology consultation and consultation on Issues and Options DPDs for the Garden Communities.
Mrs Susan Baugh, SA188	Despite this both BDC and UDC have effectively only taken into account the developers'/landowners' statements in future use of the airfield, despite community engagement being a key prerequisite as part of the development of a Garden Community.	All evidence received during previous consultations was considered when making a decision regarding the future use of the airfield.

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Linda Palmer, SA185	<p>Objection on grounds of lack of information from the Council including non-engagement with residents.</p> <p>The display in the Library had little information available. A leaflet and a report with no one on hand to answer questions.</p>	A full consultation programme was implemented as described in the Consultation Statement (Eb006)
Linda Palmer, SA185	When meeting two of the Conservative Councillors at a local meeting, they failed to respond to questions, rather reading out a prepared statement. Their refusal to reply and provide the information requested showed no will to engage with residents nor providing the information requested. It appears that Braintree District Council would prefer residents to be ignorant of the Application and not object to it.	We are not able to comment on the specific circumstances outlined in the response but officers from all the NEAs were available to ask questions via phone or email if required.
Cllr Mrs J C Beavis, SA235	I demand a full explanation from Braintree District Council regarding this shambolic consultation which indeed started during the holiday period when many residents are in holiday or planning for schools, colleges or universities.	<p>The consultation period was held during a similar period for the regulation 19 publication draft Local Plan.</p> <p>The consultation period ran for 6 weeks including the entirety of September, most of which is outside the holiday period.</p>
Shalford Parish Council, SA103	Fourthly there has been lack of public engagement by BDC for the current consultation as no local events have been arranged by them, the consultation has taken place during the summer when many people are on holiday and the consultation portal is exceedingly difficult to use. It has been left up to Local Councils such as The Salings to set up their own drop in centre to inform residents of BDC's proposals.	See above
Mr Keith Quinton, AM121	The whole of the consultation. Lack of public engagement and insufficient time allowed to read and understand the mass of documentation produced. Totally unacceptable. Consultation period also at the wrong time of year as many people taking holidays during August/September.	See above
Mr Chris Osborne, SA180	Poor community engagement.....I didn't know about these plans.	A full marketing campaign, including advertising through social media, press notices and advertising was undertaken. In addition a special edition of the Council's magazine, the Local Plan leaflet was sent to every household in the district. Please see the Consultation Statement addendums EB006a for further details.
Wivenhoe Town Council, SA125	The above [SA] methodology is baffling to all but a small group of people. We have never understood why it was so complicated and conclude it would discourage the public to engage with the process. We also question how an evidence base can be assumed.	We appreciate that technical consultation is by its nature specialised. The NEAs have summarised the purpose and content of the technical consultation through the Local Plan leaflet Summer 2019 which was mailed to households.

Respondent	Summary of Comment	Response
Mr & Mrs Jonathan Roberts, SA65	- the planning portal is too complicated and difficult to use - due to the volume and technical nature of the documents, most of us 'lay people' have required them to be summarised by those less determined to obfuscate - we approached responding via any channels at all with hesitation as this may provide weight to the argument that Braintree District Council have fulfilled their obligations and engaged the public seeking their views - this cannot be seen to be the case as BDC have not engaged in ANY public consultation events. The burden of informing the public has been borne exclusively by residents and campaign groups.	See above
Mr Neil Gilbranch, SA24	Adding to this, the format of this so called "Technical consultation" makes it even more difficult to make objective comments due to the scope and scale of the various documents presented for comment.	See above
Mike Lambert, SA119	Finally, the process for deciding which strategies are to be considered, and which sites should be included, appears to have been left to the NEAs with no further scope for consultation. This does not accord with the Inspector's wish to see full and proper engagement. There should have been a further stage of public consultation before the Councils determined what alternative strategies the ASA would assess.	The NEAs are the plan making authority and is thus responsible for setting the direction of strategic growth. The Check and Challenge workshop for the additional SA included an afternoon session where participant's views on the spatial strategy were taken on-board. A full public consultation on the final SA was part of the Technical S1 Consultation.
Mrs Anne Aggiss, SA64	I find the lack of engagement of the councils and our Local Councillors unwillingness to engage on to answer our Communities concerns about this plan unacceptable. There has been NO engagement. When asked about their mandate we were told by the leader of the council who is our county councillor "it's out of his hands! " So what exactly does that mean ? So have the decisions already been made with out proper engagement with the communities that will be effected?	It would be highly unusual for Local or County members to get directly involved in public consultations – this is not a requirement of the SCI and had never been undertaken in previous consultations.
Shalford Parish Council, SA103	...cannot see any evidence that the work done in the afternoon has been taken into account in developing a methodology for this SA work and it is disappointing that there has been no other public engagement to help with this SA.	Significantly more public engagement was carried out for the Additional SA than one would typically expect for any SA. This included a consultation on the Methodology Scoping Statement, a series of drop-in sessions, a check and challenge workshop and the distribution of site information proformas.
Mr Bill Marshall, SA68	The Public Consultation Process has not taken place in Tendring. Requests to TDC officers (from W07 Aug19) of the details of the six week PubCon were not forthcoming until M16 Sept19.	Publicity was undertaken across the North Essex area for the consultation. In Tendring this included a press release which was published in the Clacton and Frinton Daily Gazette, EADT and Harwich and Manningtree Standard. A copy of this was also provided to the programme officer.

Respondent	Summary of Comment	Response
	In the Clacton & Frinton Gazette the TDC Council Leader has ALWAYS promoted (good) news about the GCs: funding; HIFs; infrastructure; RTS etc - for the PubCon there has been no news - so how can the local residents be expected to participate in the PubCon.	
Luanne Still, SA155	There has been very little information and public consultation. In addition there was a very late submission to the planning process which i find very suspicious and underhand.	<p>The NEAs have summarised the purpose and content of the technical consultation through the Local Plan leaflet Summer 2019 which was mailed to households.</p> <p>The NEAs have to consider all reasonable alternatives to the growth strategy and it considered the Kings Dene submission on that basis which was only put forward by the landowner at a late stage. The NEAs did this in the interests of transparency.</p>
Mr Peter Hill, SA159	I hope this document will be part of a meaningful public consultation process to ensure that this new community is developed in a properly thought through way. The early plans I saw from consultants appointed by Colchester Borough Council a couple of years ago were appalling. They clearly had not been given a well-considered brief to help define the principles required to achieve a new community but instead what was proposed was more urban sprawl which so characterises most of Colchester and with any focal point in the scheme.	A programme of community engagement in accordance with the SCI will be undertaken as part of the DPD process. This will include continued public engagement.
Mrs Sarah Tassell, SA212	The shocking lack of information and public consultation, and the late submission to the planning process makes this development very suspicious and underhand, and the thoughts of the local community is clearly not important to the developers.	<p>The NEAs have summarised the purpose and content of the technical consultation through the Local Plan leaflet Summer 2019 which was mailed to households.</p> <p>See above</p>
Mr Mark Taylor, SA272	Lack of information and public consultation. Late submission to the planning process.	<p>The NEAs have summarised the purpose and content of the technical consultation through the Local Plan leaflet Summer 2019 which was mailed to households.</p> <p>The NEAs decided to accept the Kings Dene submission as would be objectively prudent when reconsidering all reasonable alternatives at the method scoping stage of the SA.</p>
Mrs Lydia Taylor, SA273	Lack of information and public consultation. Late submission to the planning process.	See above
Mr Philip Robinson CBE, AM45	Community and stakeholder empowerment in the design and delivery should be stated to include existing homeowners within the site from the outset (Note that there has been no specific engagement with this important set of stakeholders to date - a major failure in the consultation	Landowners will be included as part of the wide range of consultation and engagement in DPDs going forward.

Respondent	Summary of Comment	Response
Matthew O'Connell, SA267	process!!) There were no community engagement sessions during the period in which the new evidence was being prepared in order that community perspectives could be incorporated into decision-making.	Due to the nature of the technical consultation materials it was considered that the topics did not lend themselves to on-going community engagement.
Matthew O'Connell, SA267	BDC had two Local Plan sub-committee meetings to consider the new evidence. After the first meeting the Council received numerous complaints that questions or views posed during the public speaking session were entirely ignored.	Members and officer responded to issues raised during public question time at the beginning of LPSC meetings though debate and discussion when considering the relevant item of the report.
Matthew O'Connell, SA267	The District Councillor for The Salings and Rayne voted in favour of submission of the new evidence (and therefore to resume examination of the plan) despite numerous petitions to him setting out a quantitatively-evidenced, virtually unanimous opposition in the ward to the site selection of WOB, and indeed many concerns expressed about aspects of the evidence, especially Rapid Transit. He cited the re-election of Conservative councillors and a 'silent majority' as evidence of local acceptance and support of the Plan, despite the overwhelming quantitative evidence provided to him	The political actions of individual Councillors cannot be commented on.
Matthew O'Connell, SA267	BDC delivered and distributed (via email and social media) informational material regarding the Local Plan. In a number of cases the bias and outright misrepresentation inherent in this material was very concerning, and we believe this may have corrupted the public consultation process. One key example being a Braintree Media Release on 18 September.	BDC communication on the Local Plan was written with sincere reference to the published factual information. BDC consider that that statements made during the consultation are a fair representation of the issues.

Appendix 1 – screenshots of consultation portal

<https://braintree.objective.co.uk/portal/nea/s1tech/> Technical section 1 Landing Page

(please note this screenshot was taken following the closure of the consultation period).

[Consultation](#) > [North Essex Authorities](#) > **Technical Section 1 Examination Consultation 2019**

Technical Section 1 Examination Consultation 2019 - now closed. Responses have all been processed and forwarded to the Inspector.










Braintree District Council, Colchester Borough Council and Tendring District Council (the North Essex Authorities) have prepared a shared strategic Section 1 of their Local Plans in order to comprehensively plan for the future of North Essex. This shared section contains a commitment to meet the sub-region's housing, jobs and infrastructure requirements through the planning and delivery of three new Garden Communities at Colchester Braintree Borders, Tendring Colchester Borders and West of Braintree.

The North Essex Authorities' Section 1 was submitted to the Secretary of State in October 2017 and an Examination in Public was carried out at the beginning of 2018. Following the appointed Planning Inspector's post-hearing session findings ([see 8 June letter](#)) the Authorities have been working on a revised evidence base, an Additional Sustainability Appraisal and suggested amendments to Section 1 to address the issues raised by the Inspector.

The additional work has been approved by elected members at the three authorities. The evidence has now been subject to public consultation. Responses have been forwarded to the Inspector ahead of further hearing sessions.

The Inspector has published an Explanatory note ([IED/016](#)) which confirms how the consultation fits into the rest of the examination.

Please be aware that it is important that we have contact details for all our consultees. To make a comment you will need to Login/Register (see above). Please note that if you are on our consultation database you will already have an account.

Show Consultations for:	Technical Section 1 Examination Consultation 2019	 RSS	
<input type="button" value="List View"/>	<input type="button" value="Date View"/>		
Consultation	Start	End	Status
<input type="checkbox"/> Additional Sustainability Appraisal (SA)	16/08/19 09:00	30/09/19 17:00	 closed
<input type="checkbox"/> Habitats Regulation Assessment North Essex Authorities Strategic S1 Local Plan	16/08/19 09:00	30/09/19 17:00	 closed
<input type="checkbox"/> Modal Share Strategy for the North Essex Garden Communities	16/08/19 09:00	30/09/19 17:00	 closed
<input type="checkbox"/> NE Garden Communities: Infrastructure Planning, Phasing and Delivery	16/08/19 09:00	30/09/19 17:00	 closed
<input type="checkbox"/> North Essex Authorities Infrastructure Order of Costs Estimate	16/08/19 09:00	30/09/19 17:00	 closed
<input type="checkbox"/> North Essex Authorities: Build Out Rates at the Garden Communities	16/08/19 09:00	30/09/19 17:00	 closed
<input type="checkbox"/> North Essex Authorities: Delivery Mechanisms Position Statement	16/08/19 09:00	30/09/19 17:00	 closed
<input type="checkbox"/> North Essex Authorities: Section 1 Viability Assessment	16/08/19 09:00	30/09/19 17:00	 closed