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EXAMINATION OF NORTH ESSEX AUTHORITIES SECTION 1 PLAN

HEARING STATEMENT BY EDWARD GITTINS

The contents of this Hearing Statement are principally relevant to Matters 1 & 2 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 the content of representations submitted at all previous iterations of the Plan.

Submissions

2. This Hearing Statement focuses on the Plan's Vision for the Strategic Area, the Strategic Objectives, and Sustainable Development.
3. My related but separate second Hearing Statement principally relates to Matters 6, 7 and 8 in the Inspector's Matters, Issues and Questions focusing on the proposed strategic developments themselves and, in particular, the garden communities: here, I comment on the implications of the current Issues and Options Consultation and challenge the notion that the proposed garden communities have been adequately demonstrated to represent the most sustainable or environmentally acceptable strategic options.
4. On a positive note, I suggest that an opportunity should be provided to reallocate the 7,500 dwellings envisaged to be delivered by garden communities within the Plan period and that longer term (ie: post 2033) strategic growth should be evaluated through a separate DPD process.

5. Combined, the two Hearing Statements conclude that there are fundamental flaws in the strategic content of the Plan which require amendment if the Plan is to be held to be sound.

Vision for the Strategic Area

6. A long term plan has to be built on solid foundations. In addition to the need to allocate land for future growth in the form of sustainable development, it must also seek to provide solutions to the factors which have led past development - a great deal of which takes the form of planned development - being regarded as insufficiently sustainable. Daunting though the scale of future needs is, it still represents only a relatively small increase compared to the existing number of houses, jobs and travel movements. Thus, a simple review of the main reasons why past and especially more recent planned development has for the most part been insufficiently sustainable would probably identify the following key points:

- The need to commute to work and the undue scale and distance of such movements. The resident workforces of Tendring and particularly Braintree rely hugely on employment beyond their District Boundaries making them some of the least self-contained Districts in employment terms not only in Essex but in England.
- The promotion of a housing growth strategy out of kilter with complementary employment growth initiatives – itself contributing to high out-commuting levels by public and private transport modes.
- The unduly heavy reliance on private rather than public transport. There has been long term under investment in maintaining and improving public transport as an alternative to the motor car. Colchester, for example, has only recently opened its first park and ride - whilst rural bus services in particular continue to decline.
- The mismatch between the scale of housing growth and especially that within the last 10 years on the one hand - and associated investment in community infrastructure and services on the other. Pressures on the Hospital and other Health Services in Colchester and elsewhere are particularly acute.

- The failure to deliver sufficient numbers of affordable homes and to reduce numbers on the Housing Registers. This failure is an important contributor to the under supply of housing to meet national and local needs as well as having negative consequences for social well-being and social mobility.
- The rigid approach to determining what constitutes sustainable development – with villages, for example, being deprived of reasonable growth on the grounds they are too remote and unsustainable – thereby contributing to them becoming even less sustainable.

7. If there is a measure of agreement that some or all of the above factors should be addressed in a sustainable development strategy, the following questions need then to be asked:

How much appreciation of the above fundamental issues is found in the proposed Vision and consequent Strategic Objectives?

Will the proposed garden communities:

a) be more self-contained in terms of employment or will they significantly add to the level of out-commuting?

b) decrease pressures on more distant community services?

c) deliver the envisaged housing capacity and jobs within and beyond the Plan period?

8. The first step in answering the above questions is to focus on the Vision for the Strategic Area – Matter 1: Question 9 in the Inspector’s Matters, Issues and Questions.

9. In my view, the Vision for the Strategic Area is deficient in the following ways:-

- a) It not only shows inadequate appreciation of the need to address the factors identified above which have led to existing development being insufficiently sustainable, but also fails to indicate how this can be ameliorated alongside sustainable future growth.

- b) Given that only 7,500 dwellings are expected to be built within the garden communities in the Plan period, (only 17.15 % of the 43,720 dwellings required in North Essex during the Plan period), the role of garden communities in delivering pre-2033 sustainable development will be relatively limited - yet the lion's share of the Vision for the Strategic Area's text is devoted to garden communities.
- c) It is fixated on post-2033 growth and fails to provide adequate vision for the 36,220 dwellings (82.85%) to be provided pre-2033 outside the garden communities.
- d) There is insufficient recognition of the role of employment creation in the delivery of a sustainable development strategy - and in particular the need to bring homes and jobs closer together for existing and future development;
- e) It is silent on the future of the countryside which will remain the most extensive geographical area and also silent on the future role of rural settlements.

Strategic Objectives

10. I do not regard the strategic objectives as set out in paragraph 1.31 to be strategic objectives at all: rather, they are a set of general aims that would apply to any Local Plan. Strategic objectives should, inter alia, reflect how proposed strategic developments will stem from, and integrate with, national and regional initiatives and policies in order to secure specified strategic benefits within the Plan area. Here, then, is the place to identify strategic influences within the fields of, for example, housing distribution and provision, transportation, the economy and other major infrastructure projects. At the very least, I would expect to see mention of the M11-A12 link, A12 improvements, Cross Rail, the Haven Gateway, and Stansted Airport and how these projects will influence the future direction of growth and the future prosperity of North Essex.
11. Whilst some of these initiatives are flagged up in paragraph 1.58 *et seq*, these generators of change and economic dynamism hardly feature in the Plan as key strategic factors influencing change and growth.

12. The Plan and its policies are not therefore based on a sound appreciation of strategic considerations and is essentially devoid of strategic objectives.

Sustainable Development - Policy SP1

13. Throughout the formative stages of this Plan I have advocated the need for a clear practical definition of what constitutes sustainable development so that this can be adhered to by planning authorities and developers. In order to secure sustainable development, my own thought is that the overarching aims should be:

- *To make each District and every Settlement as self-contained and self-sufficient as appropriate and possible especially in terms of access to employment, education, health and other community facilities and services;*
- *To exploit opportunities for growth and change that enable existing and future development to be served and accessed by public transport and encourage the use of non-motorised travel; and*
- *To minimise the harmful impacts of change on the environment.*

14. Reducing the need for motorised trips, and reducing the distance or frequency of motorised trips, would probably make the greatest possible contribution to achieving sustainable development and have the least possible effect on climate change.

Conclusion

15. The Vision for the Strategic Area and the Strategic Objectives do not provide an adequate framework for the Section 1 Plan, whilst amendments are suggested to Policy SP1 to clarify the meaning of “sustainable development”.



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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.