

Comments

Publication Draft Local Plan - Section 1 (16/06/17 to 28/07/17)

Comment by	Stebbing Parish Council (Mr Greg King)
Comment ID	144
Response Date	27/07/17 12:32
Consultation Point	Policy SP 10 West of Braintree Garden Community (View)
Status	Processed
Submission Type	Web
Version	0.2
Do you consider the Local Plan is legally compliant?	No
Does it comply with the Duty to Co-operate?	No
Do you consider the Local Plan is Sound?	No
Please specify on what grounds you do not consider the Local Plan is sound	<ul style="list-style-type: none"> . Positively Prepared . Justified . Effective . Consistant with National Policy

Please enter your full representation here

Objections to “West of Braintree” in the Braintree Local Plan

Firstly we wish to state that “West of Braintree” is, in facr, the village of Stebbing. You could have presented this as the “West Braintree” settlement, but psychologically the wording suggests to your residents that the development is not IN Braintree. Uttlesford District Council in a similar vein called their development “East of Stebbing” – which is Braintree. Stebbing is angry at this duplicity. It is neither fair nor honest to either districts’ residents.

Stebbing Parish Council objects most strongly to the “West of Braintree” settlement which forms a major part of the Braintree Local Plan. The Plan is not sound in planning terms nor is it in accordance with the National Planning Policy Framework. We argue that the Duty to Cooperate has not been thorough and that it does not comply with Garden City principles.

Duty to Cooperate.

Braintree, Colchester, Uttlesford and East Hertfordshire have surely made a catastrophic error in that all districts have concentrated a large if not major proportion of their housing requirement in the A120 corridor. The A120 is already severely congested, most particularly in the sections from Bishop’s Stortford/Stansted through to the Galleys Corner and Marks Farm roundabouts and on to Marks Tey

in Colchester. The congestion experienced at most of these points exists throughout the day and not just during rush hours. We hold that the duty to cooperate should have concluded that development should have been more equally divided between the A10, A11, M11 and A13 corridors. It is felt that 4,000 house in total for Dunmow and Takeley, 12,000 for Braintree and Uttlesford and 10,000 at the Eastons all pouring traffic into a 5 mile section of the A120 corridor is completely impracticable. This is in addition to two major gravel extraction sites, both on the same 5 mile stretch of road, one actually on the "West of Braintree" settlement site. We feel that scant attention has been given to the needs of the current inhabitants of this area who already suffer from the congestion caused by the additional housing which has been completed. This ill-conceived plan in this section of the A120 has very few adequate north-south routes within easy distance. The proposed development is in Northwest Essex, whereas Braintree should be planning to build in Mid Essex to take advantage of opportunities provided by the City of Chelmsford and the larger towns to the south. Regarding the D.T.C., Braintree has worked formally in relationship with Colchester and Tendring; it has not done this with Uttlesford even though it is building up to our village border and proposing part of its infrastructure in Uttlesford. Uttlesford in its Regulation 18 Consultation has put forward housing at Andrewsfield and Boxted Wood as part of the "West of Braintree" settlement. There is no real evidence in the D.T.C. of any collaborative planning strategy or master planning vision from the two districts for this joint venture. We are concerned that this could result in a disjointed and dysfunctional planning strategy for the area. This is not acceptable.

Soundness.

According to N.P.P.F. para. 151, the Local Plan must be prepared with the objective of contributing to the achievement of sustainable development.

We would argue that the plan is not sustainable and therefore not sound. It would be many years before major infrastructure benefits were felt. The area is remote from any main centre. Neither Dunmow nor Braintree has any real shopping centres in the sense that many people regard as their weekend leisure activity. People will drive to Westfield, or to Chelmsford and take the train. Freeport has limited shopping opportunities. All shopping locally involves car use. Accessibility to doctors surgeries and hospitals involves travelling some distance, in the case of hospitals, great distances. If current C.C.G. proposals come to fruition it could involve travelling dangerously long distances for acute patients. Primary Schools locally are full and are already having to agree to 30 plus class sizes contrary to government advice. In our village a resident in social housing had to be moved to the local town because without a car she could not access basic services for her baby. Experience has shown that for many years occupants of the development could be reliant on the current local services, many of which are already overstretched.

Some years ago Colchester build a development near the Town Railway Station within walking distance of the town centre. It did not provide parking for certain categories of housing. The result was parking chaos and bad neighbourliness and a completely car dominated environment with yellow lines necessary for access for services. Limited car usage will not happen unless the Government legislates to that effect – an unlikely outcome. Rural buses, largely because of their infrequency, indirect routes and expensive fares, run empty for most of the time. People will not abandon the car; it has become part of the expression of identity. We therefore consider the development far too aspirational in terms of car and public transport usage.

Braintree Railway Station has a tiny car park and, as you would expect, no spare capacity. It is in the middle of a congested town, and it is an hour-long journey to London, with frequent stops. Commuters in this area travel to London via the faster routes, from Stansted, Bishop's Stortford and Chelmsford, or drive to the outlying tube stations such as Epping which offer a much cheaper route into London. It is very highly questionable whether evidence provided in The Plan will support a sustainable development of this size in this location with regard to travel.

N.P.P.F. Paras 29/30/34/35/36 are all concerned with promoting sustainable transport modes; these requirements are not positively met. Outside the proposed area there is a lack of cycle and pedestrian infrastructure. There is no direct route to London, Cambridge or Chelmsford. The development will be reliant on car usage and long before proposed interventions, residents will have become habituated to the convenience of car usage. A.E.C.O.M. accept this as a challenge. There are no rail connections and poor public transport. Travel to main centres will involve long uncomfortable bus journeys. The site is currently served by rural roads and lanes. These add to the tranquillity of the area and we are concerned that they will be used as "rat runs" to avoid already congested major roads. We seem to have cyclical recessions which lead to the withdrawal of plans for infrastructure development and we

have serious concerns that this could become a huge housing estate remote from major services and reliant upon the car. A.E.C.O.M. has huge aspirations for public transport, but there is little evidence to suggest that this will come about. The current mode split for Braintree is 75% private car and only 12% public transport usage. A.E.C.O.M. do frankly admit that the “settlement location has the potential to be used as a residential base to commute to existing centres of employment.” We contend that this is the main reason most of the projected 22,500 people will wish to relocate there.

In terms of sustainability Braintree/A.E.C.O.M. reasoning seems confused. On the one hand they see this development providing for all of its occupants’ needs: On the other hand they do not seem to wish to detrimentally affect the viability of Braintree town centre. A.E.C.O.M. acknowledge that “a development of this size could have the potential to act as a competitor location and thus impact the resilience of established centres, especially Braintree Town Centre.” It would surely be better to enlarge Braintree town to enable it to sustain a dying town centre rather than build a competitor settlement nearby.

“West of Braintree” will not be self-sustaining. A.E.C.O.M. acknowledges that “the proposed settlement performs relatively poorly against the criteria (the criteria being ‘a self-contained settlement’) which extol sustainable access to local jobs in the wider area”: One should not be able to choose which N.P.P.F. bits one likes and which not. “West of Braintree” settlement could well be reliant on commuting and therefore in danger of becoming another dormitory town.

The major employer in the area, Manchester Airports Group at Stansted, has previously made representations to Braintree objecting to the proposal and expressing concern about the reliance on car usage and the adverse impact this would have on J8 of the M11. A.E.C.O.M.’s report is full of aspirational terms and assumptions which it admits to being ambitious, challenging and possibly detrimental. Stebbing Parish Council would require more certainty buying a lawn-mower than Braintree seem to have for a new town.

We see now evidence why the best and most versatile Grade 2 agricultural farmland is being developed before brownfield land in Braintree. This is contrary to the N.P.P.F. and is foolhardy. The land in this area is generally perceived as flat so that views of a very attractive area of countryside are available from all vantage points, but especially from Stebbing Green over to the Boxted Wood area. In terms of biodiversity Stebbing is very concerned at the effect 12,000 homes will have on the countryside. The area around Boxted Wood, Stebbing Green and Gt. Saling is home to a very large herd of fallow deer. Their area is already restricted by the fencing which protects the A120 and, along with badgers, they are a common sight. Increased traffic has increased the number of dead animals on the local roads. These animals constitute a danger to motorists as well as to themselves. We fear for Boxted Wood when it eventually becomes part of the new town. This ancient woodland is not “A Landscape Effect” as described by Galliard, it is the home of many mammals, insects, birds and butterflies, it is a living environment and will not survive the pressure of 22,500 people many of whom will choose to have dogs. The NPPF protects biodiversity this development cannot and does not.

Most villages in Essex have their own character and identity: Stebbing is no exception. It has strong Community Cohesion caused to some extent by the fact that it is remote in many ways from any large town. This has caused us to be perhaps more caring of people in need who live in the village. A Galliard consultant commented upon this some years ago and asked how Community Cohesion could be achieved in the new community, as if it were a design feature that could be installed. We are fearful that this huge settlement will change our village, with its community shop and many societies, into a suburb of a large town.

N.P.P.F. Paras 118, 123, 125, 126, 132.

Ancient Woodland at Boxted Wood is not adequately protected. The night sky in this area is relatively dark and light pollution will equal the “glow” from Stansted Airport. Development at Andrewsfield Airfield is in one of Braintree’s options for W.O.B. This is an active facility and a heritage asset. It is visited by American Airmen who served there in the 2nd World War. It trains pilots. It forms part of the area’s leisure facilities, with many people travelling there to fly. The development will impact on the surrounding villages of Great Saling, Bardfield Saling and Stebbing and change the landscape forever.

AECOM acknowledge the “the scale of the development proposals will undoubtedly have a significant impact on the surrounding settlements” they further state “Large scale development of the site would impact on the rural character of the small settlements surrounding the site”.

The site is located in a “minerals safeguarding area”, and, given that permissions have already been allowed for extraction, this will surely allow piecemeal development.

N.P.P.F. Para. 112. The proposal results in the loss of 2,500 acres of the most versatile grade 2 agricultural land. The N.P.P.F. seeks to protect this if poorer land is available. Braintree has much brownfield land which it chooses not to develop.

If your representation is more than 100 words please provide a summary here

Stebbing Parish Council asserts that the Braintree Local Plan is NOT sound in planning terms. The Duty to Cooperate has not been sufficiently fulfilled with particular regard to Uttlesford. It is premature with regard to Mineral Safeguarding. It is not sustainable in regard to the N.P.P.F.

Please specify the changes needed to be made to make the Plan sound/legally compliant

We have no suggestions to make the plan work and would suggest that Braintree reconsider the plan before its submission to the inspector.

Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Do you wish to participate in the oral part of the examination? Yes

Please outline why you consider this to be necessary

We fear that this development could irrevocably change our village

Did you raise the matter that is the subject of your representation with the LPA earlier in the process of the preparation of the plan? Yes

which stage?

- . Issues and Scoping
- . Preferred Options

Do you wish to be notified:

- . When the document is submitted for independent examination
- . When the inspectors report is published
- . When the document is adopted