

Felsted Parish Council response to BDC consultation

Link: <http://www.braintree.gov.uk/consultlp>

Why a new Local Plan is required

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Felsted Parish Council understands the drivers for the production of Local Plans. They are by nature highly complex and require careful presentation if they are to be understood. The event at Great Sailing, to explain the Plan and this stage of the consultation, was woefully inadequate in the presentation of information and the level of knowledge and experience of those presenting it.

Furthermore, this document itself is bizarre in its approach, asking for comment on every phrase, leading to hundreds of 'questions'. There is no indication of their relative importance, reading as it does like a stream of consciousness, rather than a consultation document seeking opinion on key and specific areas.

Felsted Parish Council has therefore chosen to offer all comment regarding the proposed New Town to the West of Braintree against a single comment point. This does not indicate agreement/disagreement with any other points.

Whilst a document detailing 2 options for the proposed New Town to the west of Braintree is available on the Plan website, at the Gt Sailing meeting we were told to ignore this and comment only on the outline principle.

This only adds to the confusion over what is being consulted on and emphasises the poor and disorganised nature of this consultation. Given that the detail of these 2 options is on the website and they would have a significant impact on the Parish of Felsted were they implemented, we have decided to comment against some of their aspects alongside broader issues.

- **3.87 - Policy SP10: West of Braintree New Garden Community**

http://braintree-consult.limehouse.co.uk/portal/newlocalplan/draft_local_plan?pointId=s1462346815663#section-s1462346815663

“Object”

We do not believe that this site offers a viable location for a New Town.

Whilst a document detailing 2 options is available on the Plan website, at the Gt Sailing meeting we were told to ignore this and comment only on the outline principle. This is a bizarre situation that only emphasises the poor and disorganised nature of this consultation. Given that the detail of these options is on the website and they would have a significant impact on the Parish of Felsted, we have decided to comment against some of their aspects alongside broader aspects.

Whilst the siting of a large new development is perhaps attractive in decision making, the reality is that individual major new settlements are an unreliable way of providing housing. They cause major upset to the locality, overloading the existing physical and social infrastructures, and are generally delayed and deliver at slower than planned rates. This means that they do not reach a sustainable size for decades, which is often used as an excuse for delaying some of the infrastructure needed to make them a success, rather than a burden on nearby settlements and infrastructure. This has already been demonstrated by reports that the number of houses for this plan period is being reduced from 2500 to 1500.

Recognition that infrastructure limitations will significantly reduce the Plan period build rate for the New Town to 2500-1500 houses in Braintree, must make the ‘option 2’ of an additional 2500 houses in Uttlesford impossible to achieve.

There also appears to be no mention of how the MOD Wethersfield site, which is promoted as being available for 4850 houses in 2020, but for some reason is not included in the Local Plan process, would impact on this development.

There is no confidence that the District Council would be able to control the development and prevent it from becoming another 'Flich Green estate', with no facilities built for years. The financial interests and legal muscle of developers will always 'out lawyer' the desire of Councils to deliver their vision.

Calling a New Town of 13,000 houses a 'garden community' raises alarm bells that from the very top the process is all about marketing. Nowhere does it mention that the reality is the building of high volumes of housing, over grade 2 and 3 farmland, adjoining nearby, currently isolated, villages.

We make the following additional and specific points:

1. A key part of the 'West of Braintree' site has been identified for mineral extraction. In the 2 development options shown in the consultation package, the main access points for the development are across the mineral extraction area. Given the mineral extraction period of c15 years, this suggests that either the development will go ahead without improved road access, or it must be delayed beyond the mineral extraction period. In either scenario, the development is not viable for this plan period.

In addition, and in accordance with NPPF sec13, 143, land potentially suitable for mineral extraction must be protected from development. A report should be provided to show the mineral deposits across the whole of the proposed development area. If extractable minerals exist beyond the boundaries identified, then the development must not progress before the minerals have been extracted.

2. Boxted Wood is within their potential development area. As per NPPF sec 12, point 126, Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Boxted Wood and its surrounding area must be protected as an ancient woodland and its immediate environment.
3. Section 11 of the National Planning Policy Framework must be adhered to. Specifically section 112, 'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

The proposed development area includes a high proportion of Grade 2 and 3 agricultural land. This should be protected.

This was demonstrated through planning application UTT/16/0287/OP Land to the South of Braintree Road, Felsted, outline application for up to 55 dwellings. Permission was refused on 28 July 2016. Reasons stated included:

“The site is identified as being grades 2 and 3a under the Agricultural Land Classification and is therefore defined as being ‘best and most versatile agricultural land’. The proposed development for the erection of up to 55 dwelling units would result in a disproportional loss of this best and most versatile agricultural land contrary to policy ENV5 of the Uttlesford District Local Plan as Adopted (2005) and the National Planning Policy Framework.”

4. The development proposal includes A120 road junction changes to improve access and guide traffic towards the East and West. When the A120 was built, the junction closest to Felsted was limited in access to prevent Felsted from becoming a southbound ‘rat run’. The proposed changes will deliver exactly what was carefully prevented in the road’s design.

The A1417 will be the only direct southbound route from this development and will take drivers straight into Felsted. Felsted is a Parish of fewer than 1,000 houses at a low density in c15 square miles. Building a development of up to 13,000 houses adjoining (and potentially partially within) the Parish will change and damage forever the unique character of Felsted and its centre, protected as a Conservation Area and already suffering from traffic congestion. This congestion is at least partially the result of the village layout, being a traditional crossroads, where all traffic flows through the centre. This has already been impacted by the development of Oakwood Park and will be massively impacted by this New Town development, with traffic looking for routes through the area.

The assessment process must maintain realism in reviewing routes residents will take to reach key transport hubs. , to ensure that historic sites and villages are not ‘set up’ to become rat runs from any new

housing area, as people seek to avoid rush hour congestion on recognised main routes.

5. Whatever is said regarding the potential for new employment, the reality of housing in this area is that it will attract those who commute. This will involve either driving around or through Braintree to reach the train station, using roads which are already at a standstill during rush hour, or alternatively using the mainline (and planned new) Chelmsford station. London commuters already cause high levels of traffic heading into Chelmsford, again using roads which are already heavily congested. Should the Chelmsford Local Plan proposal to add 2500 houses to great Leighs be approved then, even with a planned bypass to the new train station, the route into Chelmsford will be blocked. The alternative Chelmsford route to avoid part of this congestion would be to use a route through Felsted, which would again turn the village into a commuter 'rat run'.

Small villages to the north of the development will face similar traffic problems, blighting their communities.

6. The development includes a significant area within Uttlesford and would require close cooperation between Uttlesford and Braintree. Compared to the collaborative work clearly already underway with Councils to the East of Braintree, there is no indication of any collaborative work with Uttlesford. With the plans now over a year apart in their timescales, it is not possible to deliver aligned plans to make this area viable for collaborative development.
7. There are significant questions to answer regarding utilities. Water supplies are a particular concern. Felsted already suffers from low water pressure, a problem which contributed to the loss of a school building to fire in 2012. Stansted airport takes its water from London due to poor local supplies. Where would supplies for 13,000 houses come from?
8. The search area for this New Town includes Gransmore Green in the Parish of Felsted. If adopted, this would ultimately join the Parish of Felsted with Rayne and beyond to Braintree.

A development of this size adjoining, and potentially reaching into the Parish, would be in direct conflict with the emerging Felsted Neighbourhood Plan. (website: <http://www.felstednp.org.uk/>).

This goes against accepted wisdom to avoid ribbon development and the strong views of the emerging Felsted Neighbourhood Plan to maintain the individuality and separation of villages

9. The council should also consider the Felsted Parish plan (link: <http://www.felsted-pc.gov.uk/parish-council/parish-plan/>). This has been adopted by Uttlesford District Council. This is very much a live document. It includes an action section covering Housing and Development (page 17) referencing a core principle of the Plan on page 10, that 'The feeling that the parish should remain a group of hamlets in open countryside was emphatically endorsed...'

- 10.**The site is located in an area overflowed by Stansted airport runway 4 Clacton route. The reference documents used to show numbers of flights are old and do not show the new levels, which have more than doubled following the change in flightpath usage in Feb 2016.

- 11.**In 2014, an outline planning application for an area south of the A120 towards Flich Green (ref UTT/14/2756/OP), and broadly aligned with the Uttlesford option area of the proposed New Town, was rejected on a number of factors, including coalescence. The reasons for this rejection remain valid and should be considered in any planning proposal.