

04/09/17 15:47

## Comments

### Uttlesford District Council Regulation 18 Local Plan Consultation (12/07/17 to 04/09/17)

<b>Comment by</b>	SERCLE (Dr Peter Finlay)
<b>Comment ID</b>	DP2510
<b>Response Date</b>	04/09/17 14:55
<b>Consultation Point</b>	3.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Comment</b>	
<b>Do you support or object to this section of the Local Plan?</b>	Object

#### Please explain your objection and reasons here:

West of Braintree (Stebbing) Garden Community SP8Uttlesford District Council Local Plan Sept 2017

While the need for more housing is not in question, the amount in any particular location should remain an important consideration. Both UDC and BDC appear to be lacking in this respect by failing to interact adequately with the local community and failing to be sufficiently open about the due process. The impression created is one of inevitability rather than one of open discussion. The arguments promoted by the councils and the developers are both flawed and biased.

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<b>Comment by</b>	SERCLE (Dr Peter Finlay)
<b>Comment ID</b>	DP2513
<b>Response Date</b>	04/09/17 14:56
<b>Consultation Point</b>	1 Introduction ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

## Comment

**Do you support or object to this section of the Local Plan?** Object

### Please explain your objection and reasons here:

While the need for more housing is not in question, the amount in any particular location should remain an important consideration. Both UDC and BDC appear to be lacking in this respect by failing to interact adequately with the local community and failing to be sufficiently open about the due process. The impression created is one of inevitability rather than one of open discussion. The arguments promoted by the councils and the developers are both flawed and biased.

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**Comment by** SERCLE (Dr Peter Finlay)

**Comment ID** DP2516

**Response Date** 04/09/17 14:56

**Consultation Point** 1.1 Paragraph ([View](#))

**Status** Submitted

**Submission Type** Web

**Version** 0.1

## Comment

**Do you support or object to this section of the Local Plan?** Object

### Please explain your objection and reasons here:

Having inspected the proposals they do not seem to comply with the National Planning Policy Framework recommendations and in particular sections NPPF151 & NPPF155

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**Comment by** SERCLE (Dr Peter Finlay)

**Comment ID** DP2527

**Response Date** 04/09/17 14:59

**Consultation Point** 1.13 Paragraph ([View](#))

**Status** Submitted

**Submission Type** Web

**Version** 0.1

## Comment

**Do you support or object to this section of the Local Plan?** Object

**Please explain your objection and reasons here:**

The WoB development will undoubtedly have a detrimental impact on the surrounding villages including Great Saling, Bardfield Saling, Stebbing and Rayne while destroying the landscape setting for future generations.

In addition, the proposal would swallow some 2,500 acres of grade 2 versatile farmland and AECOM themselves acknowledge that "the scale of the development proposed will undoubtedly have a significant impact on the surrounding settlements ... and the nature of the area may be altered as part of the process" They also comment that the " Large scale development of the site would impact on the rural character of the small settlements surrounding the site"

The development is also adjacent to a conservation area accommodating many Grade-1 and Grade-2 listed buildings and as a consequence there is likely to be a serious erosion of heritage and historic assets. The ancient woodlands and hedgerows which comprise a significant part of the threatened area need to be protected and accommodated within such a proposal and no details of how this is to be fulfilled have been suggested or discussed.

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<b>Comment by</b>	SERCLE (Dr Peter Finlay)
<b>Comment ID</b>	DP2530
<b>Response Date</b>	04/09/17 14:59
<b>Consultation Point</b>	3.2 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Comment</b>	
<b>Do you support or object to this section of the Local Plan?</b>	Object

**Please explain your objection and reasons here:**

This type of title serves only to obfuscate the underlying proposals. The strategy appears to be one of packing as many dwellings into an area as possible with total disregard for how the population will be supported in just about every respect that can be considered.

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<b>Comment by</b>	SERCLE (Dr Peter Finlay)
<b>Comment ID</b>	DP2536
<b>Response Date</b>	04/09/17 15:03
<b>Consultation Point</b>	Policy H5 - Residential Development in Settlements without Development Limits ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Comment</b>	

**Do you support or object to this section of the Local Plan?** Object

**Please explain your objection and reasons here:**

The BDC/ NEGC justification for Garden Towns is prompted by the need to provide affordable and social housing. There is a belief that smaller sites are not viable due to Section 106 agreements on smaller sites, in that those with less than 10 homes are not required to comply and therefore provide social or affordable housing. The assertion is that building a 'Garden Town' is thus the only way of providing affordable housing. This is quite simply incorrect. TCPA have published a resource document for Councils detailing a variety of methods by which social and affordable housing in rural areas can be provided and this document specifically does not recommend a Garden Town as the solution.

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**Comment by** SERCLE (Dr Peter Finlay)

**Comment ID** DP2537

**Response Date** 04/09/17 15:06

**Consultation Point** 5 Employment ([View](#))

**Status** Submitted

**Submission Type** Web

**Version** 0.1

**Comment**

**Do you support or object to this section of the Local Plan?** Object

**Please explain your objection and reasons here:**

Naturally, retail providers have an interest in supporting new housing but this plan conflicts with AECOM's concerns that no large single Town Centre be provided as part of WoB, since this could have a detrimental impact on the sustainability and vigorous activity of Braintree town centre and may well affect its viability. In addition, AECOM acknowledge that "...a development of this scale could have the potential to act as a competitor location and thus impact the resilience of established centres, especially Braintree Town Centre".

BDC themselves have suggested that the level of new retail provision for the new settlement should be limited. They also question "whether it would be appropriate for retail provision in the proposed neighbourhood centres to be restricted to just a supermarket and small convenience shops for a settlement of this size. This is an important point which seems to have been ignored.

It is evident that WoB cannot not be self-sustaining given that it has limited employment opportunities, making it a dormitory settlement reliant on commuting. Again, AECOM acknowledge that "the proposed settlement performs relatively poorly against the criteria ('criteria' being a self-contained settlement) which extols sustainable access to local jobs in the wider area";

The major employer in the area is Stansted but WoB has no direct access to Stansted other than by road. In fact, the owner of Stansted, MAG, has previously made representations to BDC objecting to this proposal and expressed their concerns about the inevitable increase in traffic and the adverse impact on Junction 8 of the M11.

The AECOM naive aspiration is to achieve one new job per one new dwelling. However, even AECOM acknowledge that this "employment scenario is quite ambitious and the achievability depends on many different factors, some of which are too difficult to influence". There is no real evidence presented that

this employment target can be met. BDC's assumption that 25% of the community will work from home is completely unrealistic, unfounded and there is no evidence to substantiate that whatsoever.

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<b>Comment by</b>	SERCLE (Dr Peter Finlay)
<b>Comment ID</b>	DP2558
<b>Response Date</b>	04/09/17 15:40
<b>Consultation Point</b>	6.10 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Comment</b>	
<b>Do you support or object to this section of the Local Plan?</b>	Object

**Please explain your objection and reasons here:**

Clearly, retail providers have an interest in supporting new housing but this conflicts with AECOM's concerns that no large single Town Centre be provided as part of WoB since this could have a detrimental impact on the sustainability and vigorous activity of Braintree town centre and may well affect its viability. In addition, AECOM acknowledge that "...a development of this scale could have the potential to act as a competitor location and thus impact the resilience of established centres, especially Braintree Town Centre".

BDC themselves have suggested that the level of new retail provision for the new settlement should be limited. They also question "whether it would be appropriate for retail provision in the proposed neighbourhood centres to be restricted to just a supermarket and small convenience shops for a settlement of this size. This is an important point which seems to have been ignored.

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<b>Comment by</b>	SERCLE (Dr Peter Finlay)
<b>Comment ID</b>	DP2561
<b>Response Date</b>	04/09/17 15:41
<b>Consultation Point</b>	7 Transport ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Comment</b>	
<b>Do you support or object to this section of the Local Plan?</b>	Object

**Please explain your objection and reasons here:**

As it stands, it is forecast that numerous junctions in and around Braintree will be over capacity by 2032 so clearly the local road network is wholly unsuitable for a development of this size: In fact, BDC's own Infrastructure Delivery Plan states "Much of the road urban road network in Braintree District is over capacity in the morning and evening peaks";

The site is currently served by tertiary roads and small rural lanes; these provide limited connectivity to the site from the north and south. Initially the proposal was to create a new junction off the A120 to serve the new settlement. However this proposal is now on hold for an unspecified period due to Tarmac recently being granted planning consent for a new quarry on the front part of the proposed settlement site that adjoins the A120. It is unclear at this stage when CRH/Tarmac intends to commence extraction. The proposal is to now access the first phase of the settlement off the minor B1256 road. This road junction has not been tested by Jacobs, the County or BDC and it is likely that it will be wholly inappropriate to serve the proposed settlement site, particularly bearing in mind its proximity to the Mineral Extraction site entrance;

WoB is totally reliant on the A120. AECOM themselves acknowledge that "current congestion issues on the A120 mean connectivity along this route to the east is likely to be constrained now and in the future without the proposed A120 improvement scheme". In addition, WoB could actually harm the A131 Chelmsford route (which is already over capacity) as well as Junction 8 of the M11.

It should be noted that currently, there is no funding guarantee that these highway improvements will be forthcoming.

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<b>Comment by</b>	SERCLE (Dr Peter Finlay)
<b>Comment ID</b>	DP2564
<b>Response Date</b>	04/09/17 15:44
<b>Consultation Point</b>	8 Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Comment</b>	
<b>Do you support or object to this section of the Local Plan?</b>	Object

**Please explain your objection and reasons here:**

The Braintree Infrastructure Delivery Plan (May 2017) makes mention of the utilities requirements but does not cost them. AECOM acknowledge that "to achieve a development of this size will require significant enabling infrastructure which does not currently exist on the site".

The emergency access road, which would be the only access in the event that the Blake End junction was blocked, is Pod's Lane. This is AECOM's preferred option. However, Pod's Lane is a single track road with limited passing points and multiple blind corners and is also a Protected Lane. Local Policy ADM 54 determines that "Any proposals that would adversely affect the physical appearance of these protected lanes, or give rise to a material increase in the amount of traffic using them will not be permitted". It is difficult to imagine that WoB would not increase traffic on Pod's Lane.

In an assessment of the 150 protected lanes undertaken by Braintree DC in 2013[1], only one lane attracted a higher score than Pod's Lane, reinforcing its value to the district on all the factors measured.

Pods Lane is also referred to in the WoB plan by AECOM as a "Quietway" intended to encourage leisure uses such as walking and cycling. It is included in the Feasibility Assessment with a £300,000

investment. These two uses cannot possibly be compatible – Fire Service Vehicles, Ambulances, bikes and pedestrians cannot safely share road space on a single track road. This suggests that the authors of the report have not properly surveyed the site - a sign at the southern end of Pods Lane states that the road is not suitable for heavy vehicles, which must surely include Fire Engines. It should also be noted that the possible flood risk at Pods Brook channel need to be overcome;

This cannot be seriously considered as a viable option and there do not appear to be any viable alternatives provided in the plan.

**Water** Both Pods Brook and River Ter are already failing to meet the water framework directive target of good ecological status and the WoB site is to be considered a risk of further deterioration in water quality;

**Electricity** A new 11 Kv underground cable will be needed to serve WoB causing significant disruption. A new primary substation will be needed which will be very costly and it not clear from BDC's Infrastructure plan how it would be funded - U.K. Power Networks would not be permitted under its license conditions to invest ahead of a speculative development such as this.

**Waste Treatment** A new recycling water plant will be needed. This will be very costly and depends upon Anglian Water including it in their infrastructure plan for the next Asset Management Plan which runs from 2021-25. If AWS does not include it, development will be delayed with associated financing costs to the LDV or the costs will need to be directly borne by the LDV, increasing the financial burden.

[1] Braintree DC and Essex CC - *Braintree Protected Lanes Assessments April 2013*

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**Comment by** SERCLE (Dr Peter Finlay)

**Comment ID** DP2568

**Response Date** 04/09/17 15:46

**Consultation Point** 10 Environment ([View](#))

**Status** Submitted

**Submission Type** Web

**Version** 0.1

**Comment**

**Do you support or object to this section of the Local Plan?** Object

**Please explain your objection and reasons here:**

Clearly, any increase in population will inevitably result in an increase in reliance on private vehicles with a consequential increase in risk of CO2 emissions. In addition, there will also be the extra burden imposed by all the support vehicles feeding into the sustenance of the increased community. There will also be an impact on the unique character of the currently 'dark area' which will be harmed by the light pollution created.

There is no overriding case being presented to override the unnecessary and unsustainable loss of natural environment to many rare species of fauna and wildlife including Crested Newts, as well as the detrimental impact on the historic setting. This runs contrary to NPPF Sections 11 (Conserving and enhancing the natural environment) and 12 (Conserving and enhancing the historic environment).

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**Comment by** SERCLE (Dr Peter Finlay)

**Comment ID** DP2572

<b>Response Date</b>	04/09/17 15:46
<b>Consultation Point</b>	13 Non Residential Allocations ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Comment</b>	
<b>Do you support or object to this section of the Local Plan?</b>	Object

**Please explain your objection and reasons here:**

According to the developers when queried at an 'Open Display' on the subject of additional hospital facilities being required for such a vast increase in population, the responsibility would seem to sit firmly on the shoulders of the NHS to provide the service. Given the current financial constraints affecting all aspects of health provision, the likelihood of such investment is optimistic if not fantasy.

Anecdotally, waiting times for ambulances to discharge their patients at Chelmsford and Colchester may already be up to 6 hours. Surely, it cannot be permissible to create life-threatening situations by disregarding basic requirements.

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<b>Comment by</b>	SERCLE (Dr Peter Finlay)
<b>Comment ID</b>	DP2576
<b>Response Date</b>	04/09/17 15:47
<b>Consultation Point</b>	12 Residential Site Allocations ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Comment</b>	
<b>Do you support or object to this section of the Local Plan?</b>	Object

**Please explain your objection and reasons here:**

In March 2016 The Ministry of Defence listed the Wethersfield RAF base as one of 10 sites to meet the target of 160,000 new homes in the UK by 2020. The site will be transferred to the Homes and Communities Agency by 2020 for disposal and they will then work closely with the Local Planning Authority and other interested parties to consider the best possible future use for the site. Wethersfield is located less than 10 kilometres from Braintree, has the potential to provide land for up to 4,850 homes and in contrast to the WoB location has existing infrastructure. It is also closer to Cambridge Science Park where there is actually a measurable need for housing. In addition, the Wethersfield site is a true Brownfield site yet it has not been included or mentioned in the emerging Local Plan. This is clearly a major failing on the part of BDC.