



# Shalford Parish Council

Parish Clerk:

Cathryn Carlisle

Herkstead Green Bungalow, Cornish Hall End, Braintree, CM7 4HH

Tel: 01440 731964 [shalford.pc@outlook.com](mailto:shalford.pc@outlook.com) [www.essexinfo.net/shalford](http://www.essexinfo.net/shalford)

Open letter to all members of BDC Planning Sub-Committee

Dear Councillors

We are writing to you representing the Parish Councils of Felsted, Rayne, Stebbing, Great Saling, Great Bardfield, Bardfield Saling and Shalford regarding the BDC Local Plan new settlement selection process.

We believe that the area identified as “West of Braintree” offers a high risk option for selection as the location of a new settlement. Below are some of the material risks associated with this proposal that we believe makes it unsuitable, unsustainable or undeliverable and as such could be found unsound by Planning Inspectors.

Our concerns, which have been strengthened by the Kerslake Report, the Government White Paper on Housing, the A120 new route consultation (and can be found in detail below) can be summarised as follows:

- **Transport Infrastructure –** The site is remote and situated amongst small country roads. Given the final, estimated population could be in excess of 30,000, substantial investment in road infrastructure will be required which will include Government funding which is by no means guaranteed. The site is remote from any viable rail station that could provide a good commuter service and has only limited bus service.
- **Community engagement and social cohesion –** To date both UDC and BDC have failed to carry out any meaningful engagement with local residents and the proposal has very little support.
- **Mineral Extraction –** The local residents are now faced with a significant mineral extraction area within the proposed site. This quarry will compound the issues for building a huge housing estate in the same area.
- **Noise Pollution –** The area already has significant issues with aircraft noise. The building of housing under a flight path will breach garden city principles. Further pollution (air and light) will be introduced with this proposed housing estate. This will have a material impact on the identified sensitive ecologies that exist in the region.
- **Utilities –** The proposed 30,000 population would overwhelm the current utilities. This is especially true for the supply of water and the treatment of waste water.
- **Conservation –** The region has a high concentration of wildlife, cultural and heritage assets that would be impacted. Included are 5 ancient woodlands that are being promoted by the government to have increased legal status in line with AONB and SSSI sites.
- **Community Assets –** The loss of Andrewsfield, a popular local community asset and also a non-scheduled monument to allied airmen from WWII, would impact an increasingly rare asset for the local residents.
- **Funding Risk –** Kerslake recommends that an equity or developer partner is found to share the financial risk which means that BDC will lose overall control of the



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**development process. There is an anomaly between the LDV suggestion of 25% affordable housing and BDCs objective of 40% which must question the financial viability model.**

- **Alternative Sites – BDC have not published a Brownfield site register so it has not been demonstrated that the “Brownfield first” policy has been adopted. The 2 proposed junctions for the new A120 Braintree/A12 link road are to the south and East of Braintree which makes South/East of Braintree a more favourable location for housing development.**

## 1. Transport Infrastructure

Kerslake recognises that significant investment in road and rail infrastructure will be required. New junction to take traffic onto the A120 will be essential to prevent the current B1256 becoming overloaded, creating congestion and pollution. While there are proposals for improvements to the A120 between Braintree and the A12 and at junction 8 on the M11, there has been no traffic report undertaken for the increase in traffic on the A120 between Braintree and junction 8 of the M11 which will be exacerbated by the ongoing and proposed housing developments on the A120 corridor in Uttlesford.

Although the proposed development envisages one job per household within the development, and so reduced commutes, this will not preclude excessive traffic coming onto local roads, for the following reasons:

- Those jobs cannot legally be reserved for residents
- Current norm is to have at least two working adults per household
- The jobs will not be created from day one
- Reality tells us that the higher paid jobs needed by house purchasers will come from existing centres (Stansted, London, Cambridge), not newly created local jobs.

Once on the A120, existing exit routes to the south, via the A131 towards Chelmsford, for rail links to London, are already overloaded and cannot take additional road traffic. This is without any of the 2000 additional houses proposed for Great Leighs within the Chelmsford Local Plan. Access to the Braintree rail station is also severely hampered by traffic and offers a very poor commuter service to London (only 1 train per hour). Consequently transport by private car to work will be the only option many of the new residents have.

Furthermore at a recent Chelmsford plan presentation it was said that they have not yet, but will, complete a transport survey that looks at the combined impact of housing from UDC/BDC and Chelmsford's Gt Leighs 1000+ houses on the A131 area. It is expected that a new North Bypass will be required to take traffic from Gt Leighs to the new train station at Springfield. This will cost £270m and is currently unfunded. They said that they would be



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looking to UDC/BDC West of Braintree to make a significant contribution to the cost as a part of the West of Braintree development and the anticipated resulting traffic using the A131 into Chelmsford. Also if the Great Leighs development does not go ahead they will still be looking to UDC/BDC to fund the bypass as part of the West of Braintree project.

There are no plans to improve any other roads in the development area. This development will overload small village roads and protected lanes which are already over used, in a continual state of poor repair, are constantly eroded by heavy goods vehicles, subject to flooding and have lacked any significant investment from ECC Highways. Nearby villages are already rat runs. Indeed a recent speed and volume survey conducted by Essex Highways on the unclassified road between Great Saling and Shalford showed 2000 vehicles a day passing through, presumably to the employment areas of Cambridge, Haverhill and Sudbury .

There will therefore need to be clear proposals to protect the local environment, before the West of Braintree option can be taken forward.

This proposal fails against a key aspect of the TCPA Garden City principles that, ‘New Garden Cities should be located only where there are existing rapid public transport links to major cities, or where real plans are already in place for its provision.’

Finally on transport, it is highly likely that the cost of providing the required infrastructure will make the West of Braintree Development unviable.

## 2. Community engagement and social cohesion

A key requirement of TCPA Garden City principles is the establishment of community engagement. It is clear from the representations made to Parish Councils, the existence of the SERCLE community protest group and the responses to the first public consultation that the development of “West of Braintree” is seen by the community as a retrograde step and will be resisted at every opportunity. Indeed in the consultation 80% of the respondents objected to the proposal and only 4% supported it and that was made up of the land owner, the developer and County Council departments.

Furthermore, the first AECOM work shop at Braintree Town Hall was a great disappointment to those Parish representatives who attended, for several reasons:

- Firstly it was ill timed as it gave the impression that BDC had already made up its mind.
- Secondly it was stated that although the housing capacity was 14,000, the development could be anything from 2,500 upwards, which made it impossible for constructive criticism to be made.



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- Thirdly many of the questions asked on the agenda had been clearly answered by respondents to the public consultation, giving the impression that the consultation had either not been read or was being ignored.

At the second AECOM work shop in March an analysis of the public consultation was presented but nothing in the development options presented went far enough to mitigate the sever impact that the development would have on the natural environment or surrounding villages.

There are many examples of poor social cohesion within new developments, exacerbated where the development does not offer younger residents easy access to established, local, social facilities and networks. The “West of Braintree” site is remote from existing towns and the established social facilities they offer.

### **3. Mineral extraction**

In the BDC consultation plans, the main A120 access for the new settlement is across an area designated for mineral extraction. Given the mineral extraction period of c15 years, this suggests that either the development will go ahead without this A120 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. We understand that investigations have detected further reserves across the area identified for housing. This leaves significant areas across the remainder of the site at high risk as being rejected for housing in favour of mineral extraction.

### **4. Noise pollution**

The site is located in an area overflowed by Stansted airport runway 4 Clacton route. The reference documents used by BDC 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 introduced in Feb 2016. Noise complaints to Stansted have increased 10 fold when compared to the same period last year. This does not bode well for the prospect of quiet living for potential residents and is against a key principle of ‘TCPA garden city’ development, being to deliver ‘healthy communities’.



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## 5. Utilities

At a recent presentation to Felsted Parish, Affinity Water, who cover the Andrewsfield area, reported that they had no future plans to increase water supply, and in fact expected the water available to them to reduce by 2040. They forecast a shortfall of 170 million litres of water a day by 2040.

Stebbing is considered an arid zone. Felsted is already suffering from low water pressure, which resulted in the loss of an important school building to fire in 2012. Ray Skinner, Essex County Fire and Rescue said: "We have been hampered throughout this incident by a poor water supply."

Building a new settlement to the north of Felsted, alongside Stebbing and using the same water source, must be considered a high risk to fire safety and must be the subject of a full safety review before any decisions are made that assume this critically low pressure supply can be spread to even more houses in the area.

There is insufficient waste water treatment capacity in the area as indicated by a recent UDC WCS study which stated that a new sewage treatment works would be required if their section of the West of Braintree development was to go ahead. It must be pointed out that this assessment was for the number of houses up to the end of the current Local Plan period and did not take into account the requirements for a housing estate of 30,000+ residents.

## 6. Conservation

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, Rumley Wood, Golden Grove, Cannon Wood and Mouslin Wood, which are all impacted by the proposals, must be protected as ancient woodlands. Indeed, the recent Government White Paper proposes that their protection status be raised to that of SSSIs and Areas of Outstanding Natural Beauty. Protection of their delicate ecology also requires protection of the land beyond their direct boundaries and against light pollution. The area is identified as one of the few in Essex where skies are dark enough to view the stars and light pollution will harm wildlife such as bats and owls. Without a full study of the potential impact on these and other protected species (such as Red Kites which have been seen nesting in the area), this must be considered a high risk to its likely approval for development. Furthermore there are many unprotected wild life species in the area and the proposed development will cause destruction of their habitat. For example there are many herds of deer in the area. These are seen more frequently because the fencing of large parts of the A120 has restricted their travel patterns. This will be exacerbated by the proposed development.



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As far as the heritage assets of the area are concerned these have been covered in great detail in some of the submissions made in responses to the consultation and rather than reiterate them in this letter we would refer you to them and state that we fully endorse the concerns raised.

BDC would also be required to address the Amber/Red rated risks highlighted by AECOM in their report for the development of “West of Braintree” with respect to heritage along with those raised in the consultation and in this letter.

The area to the south of the proposed development also has a high flood risk. A full study must be carried out regarding the additional flood risk to this area from ‘paving over’ Andrewsfield, before it can be taken forward.

The site would also be required to ensure that contaminated run-off and flood water did not affect the River Ter SSSI site to the south of Great Leighs.

The proposed development area also includes a high proportion of Grade 2 agricultural land. 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.’

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: “...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.”

There are however, brownfield sites available for consideration, including the MOD Wethersfield site, which is promoted as being available for 4850 houses in 2020, but for some reason is not included in the BDC Plan process.

## 7. Community Assets

Andrewsfield, which will be lost if the proposed development goes ahead, is a unique community asset. It is far from being the private light aircraft facility with a café as recorded in a recent BDC communication. It is part of the UK’s national airport infrastructure. Pilots and flying instructors are trained there and it offers a consultancy service to other airfields both in the UK and abroad. It is also a well used meeting point for local people, walkers, cyclist and tourists providing a bar and restaurant facilities.



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In summary, we again repeat that we believe that there are as yet unquantified and unconsidered, significant risks associated with the selection of “West of Braintree” as the location for a new settlement, this is not sustainable.

We have also identified a number of areas where the “West of Braintree” proposal fails completely against NPPF and TCPA Garden City Principles.

Finally we believe that BDC have not fully considered all the available options brought forward in the “Call for Sites” and have instead opted for “New Settlements” to meet their housing land supply needs. Reliance on New Settlements is a high risk option to satisfy the 5 year housing demand for BDC. History demonstrates that new settlements are rarely delivered on time or to anticipated numbers. It would therefore be wrong of BDC to not have 5 year housing demand numbers covered from smaller developments.

We therefore believe it unsafe and a high risk to Plan rejection to take “West of Braintree” forward into the preferred option process for the BDC Local Plan.

Yours faithfully

*Colin Golding*

Colin Golding

Chairman Shalford Parish Council

On behalf of:

Felsted Parish Council

Stebbing Parish Council

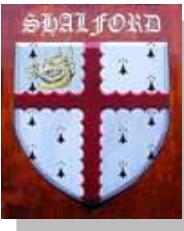
Great Saling Parish Council

Shalford Parish Council

Rayne Parish Council

Great Bardfield Parish Council

Bardfield Saling



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