

## Publication Draft Local Plan - Section 1

<b>Event Name</b>	Publication Draft Local Plan - Section 1
<b>Comment by</b>	Shalford Parish Council (Mrs Cathryn Carlisle)
<b>Comment ID</b>	517
<b>Response Date</b>	28/07/17 12:10
<b>Consultation Point</b>	Policy SP 10 West of Braintree Garden Community ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.4
<b>Do you consider the Local Plan is legally compliant?</b>	No
<b>Does it comply with the Duty to Co-operate?</b>	No
<b>Do you consider the Local Plan is Sound?</b>	No
<b>Please specify on what grounds you do not consider the Local Plan is sound</b>	<ul style="list-style-type: none"> <li>. Positively Prepared</li> <li>. Justified</li> <li>. Effective</li> <li>. Consistant with National Policy</li> </ul>

### Please enter your full representation here

Shalford Parish Council wishes to object most strongly to the proposed West of Braintree Garden Community development. In addition to our submission to the Braintree District Council's Local Plan Sub-Committee as part of the Joint Parish Councils Group we would ask you to consider the following points which we believe demonstrate that the proposal does not follow National Planning Policy Framework and some aspects of the Garden City principles and objectives and as such is not suitable, sustainable or viable and therefore makes it unsound.

We also fully support the objection submission made by the campaign group SERCLE.

#### 1. Local engagement and duty to co-operate.

There has been no meaningful engagement with the local community and all the local Parish Councils have written to BDC objecting to the proposals and asking that they rethink their planning approach.

The proposed site ajoins Uttlesford District Council who have also proposed a new settlement in that area. However Uttlesford is not part of the Garden Settlement Group (BDC, Colchester and Tendring) and there has not been any collaboration between BDC and Uttlesford to produce a joint strategy for any aspect (including infrastructure) for the area.

#### 2. Transport Infrastructure

The proposed site has no direct public transport system connecting it to the major employment areas in Essex and London. A rail connection is not viable so commuters will be reliant on private car or buses which will overload and already congested road system and put an unacceptable burden on existing country roads.

AECOM acknowledge that the site has the potential to become a commuter town and that significant investment in transport infrastructure will be required. This would be needed prior to any development to accommodate construction traffic.

### 3. Employment and Commerce

AECOM acknowledges that the site offers limited synergy with the established settlement and the local commercial and employment centres and with the increased local traffic and presence of retail on the site it will add to the existing decline of Braintree Town centre.

### 4. Natural Environment

The NPPF requires that new developments should conserve and enhance the natural and historic environment. The proposed development site is in a “dark area” with ancient woodlands, historic sites and natural wildlife habitats that will be severely impacted if the development goes ahead. The majority of it is also on good quality agricultural land. There has been no case presented that justifies this damage to and loss of the natural environment.

### 5. Alternative Strategy

BDC have failed to adequately evaluate an alternative strategy of dispersed development and brownfield site development. They have not published a Brownfield site register and completely ignored the MOD site in Wethersfield which is listed as one of their sites that will be made available for development by 2020.

A far greater area of land was submitted in the “call for sites” than was required by BDC. However they have evaluated this in a piecemeal approach with no consideration of how a dispersed development strategy could work.

In conclusion we believe that the West of Braintree proposed development will have a severe impact on our rural village through increased traffic and destruction of the natural environment that surrounds us.

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.

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

BDC failed in its duty to cooperate

BDC failed to fully assess the infrastructure needs and impact

BDC failed to adequately assess the effect on commerce and employment BDC failed to adequately assess the effect on the natural environment

BDC failed to consider an alternative strategy including publishing a Brownfield site register and have shown predetermination throughout the whole Local Plan process.

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

**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

**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