

North Essex Local Authorities Joint Strategic (Section 1) Plan CPRE Essex Hearing Statements

Matter 6

The Proposed New Garden Communities - General Issues Policy SP7, SP8, SP9, SP10

Q.4 It is evident that the locations for the proposed garden communities and associated green buffers are not adequately or accurately identified on the Policies Maps because they appear only as “areas of search” in the Joint Strategic (Section 1) Plan. As a result we have a situation where the Plan seeking to justify the **principle** of a garden community at three locations is being Examined after the deadline for responses to public consultation on the Issues and Options for the Development Plan Documents - ie providing the Conceptual Framework (potential layouts within firmed-up boundaries). Comments on the **detail** are thereby sought in advance of the independent Inspector considering the previously expressed concerns of CPRE and other bodies over Section 1 of the strategy. All logic suggests that the more detailed consultation should only follow on from the Section 1 Plan being given the green light and found “sound” by the Inspector and/or Secretary of State.

Q.5, 6 and 7 We do not believe that the infrastructure requirements of the proposed garden communities have been adequately identified and costed and that this major flaw means that, for SP9 in particular, there are just too many project unknowns. For transport infrastructure alone in relation to SP9, these include the route and timing of the A120 dualling; route and timing of the A12 widening; upgrades to GEML; location of a new station on the GEML; relocation of the Sudbury branch line; and, the variety of mass rapid transit options under consideration (with massive early cost ranges). With such uncertainties, there is little evidence to suggest that the infrastructure requirements will come forward within the necessary timescales thereby rendering the GC proposal to be immature. Also, given that the funding source and responsible body for delivering these infrastructure improvements (eg Highways England and Network Rail) will be reliant on the Government’s future fiscal policy and post-Brexit impacts on the national economy, the decisions will be largely outside of the control of the Local Development Vehicle. As a result, the promise of infrastructure-led development to ensure the success of the garden community cannot be assured and that, both in terms of financial viability and practical deliverability, this proposal is fundamentally unsound.

Matter 7

Policy SP2 - Spatial Strategy for North Essex

Q.5 We firmly believe that the policy should refer to the need to avoid the coalescence of settlements, as this is a very real threat. Not only are the residents of many rural communities highly concerned about the erosion and loss of their existing distinctive character, but they also fear the prospect of becoming swamped by a larger new settlement. Coalescence needs to be avoided in order to maintain the integrity of the social fabric of existing communities and their unique sense of place in the surrounding landscape.

As a result of the the garden community proposals in North Essex, there is the very real prospect of a coalescence of settlements to create urban sprawl stretching from Wivenhoe to Bishops Stortford. When current proposals by Uttlesford District Council for new garden communities - including 10k homes to the west of Great Dunmow - are added to those being put forward in Tendring, Colchester and Braintree, this amounts to a total of 53k homes situated along the A120 in four new settlements. Given the existing levels of traffic on this road and the degree of congestion already experienced in particular locations, this would amount to a massive increase of vehicles using the road locally as new residents travel to the key employment hubs of Essex University/Knowledge Gateway, Colchester town centre, Freeport Braintree and Stansted Airport. In addition, there will be an increase in the problem of “rat-running” through rural settlements located to the north and south of the A120, with the attendant issues of road safety and residential amenity loss.

West of Braintree, the integrity of existing settlements, such as, Rayne and Stebbing is under great threat from the proximity of the proposals for large scale developments on their borders, while the Colchester/Braintree Border GC proposal would lead to the virtual merging of Marks Tey with Feering and the historic market town of Coggeshall.

We favour a form of development which minimises environmental impact, avoids the need to develop greenfield land and supports the underlying principle of reducing the need to travel. Rather than following an approach which would lead to urbanisation of open countryside, we would wish to see more support for a “brownfield first” policy, minimising the loss of top quality agricultural land and the coalescence of existing settlements. In this respect, the NPPF should be upheld and major housing development should take place first on land of poorer quality and in more sustainable locations before greenfield land of higher quality is developed.

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The CPRE has calculated that, right now, there is enough brownfield land to build 1.4 million new homes in England without having to sacrifice valued landscapes, build on high grade agricultural land and damage the integrity and sense of place of villages and other rural settlements. The local authorities should be encouraging development and developers away from greenfield locations to places where it will do most good in terms of regeneration, sustainability, reducing the need to travel and providing a better balance between the location of new homes and centres of employment. Matching housing locations with economic activities is a much more inherently sustainable approach and we would wish to see more support for a “brownfield first” in the Plan. Paragraph 17 of the NPPF requires councils to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)”. Whilst both Colchester and Braintree have a good track record of developing brownfield land, it is clear that more could be done to develop brownfield sites before large scale garden communities are the required solution to meeting housing need. Colchester's brownfield register excludes rural and village sites and is therefore not comprehensive; whilst in Braintree, there is no formal brownfield register, but previously used land is listed in the SHLAA. MOD land at Middlewick Ranges should be included on Colchester's register and although the MOD site at Wethersfield in Braintree District has the potential for housing, it has not been included in the SHLAA for assessment.

The proposed garden communities, without further supporting evidence, appear to be an attempt to allocate land based on availability - rather than considering sustainable, deliverable development according to the requirements of the NPPF - and even with the creation of green buffers, this has led to the threat of coalescence on a significant scale.

Matter 8

The Proposed New Garden Communities - Specific Issues

Policy SP 8 - Tendring/Colchester Borders Garden Community

Q.23 CPRE supports the view that master-planned urban extensions, which make use of and build upon the existing infrastructure, are more sustainable and more viable than large new stand-alone settlements. This GC proposal benefits from and supports the growth of the University, the Knowledge Gateway (one of Colchester's three Strategic Economic Areas) and the town centre. There are, therefore, realistic prospects of local employment for residents of a new community. As a result, whilst the principle of development in this location is considered justified and effective, it is important that the associated Development Plan Document should ensure that built development is carefully positioned to ensure that the Salary Brook valley and adjoining woodlands (including Churn Wood) are safeguarded. As a result of the local topography, and to respect the amenity of the existing residents of Greenstead and Longridge Park, there should be a substantive 1.5km wide undeveloped green buffer between the existing housing and any new development. This area should ideally be dedicated as a 'Country Park' for its future protection together with the amenity provision it affords the occupants of the new homes and the existing residents of Colchester's eastern urban fringe.

Policy SP 9 - Colchester/Braintree Borders Garden Community

Q.25 In contrast to SP8, we do not believe that this GC is capable of delivering a total of 15k-24k dwellings located, as it is, far from any existing strategic employment zone and major retail/service centre. As a new and stand-alone community, it offers none of the benefits of existing employment which the east Colchester urban extension offers. It is not a Strategic Economic Area, there is no focus for employment and the level of start-ups and home-working has not grown appreciably in recent years. Whilst land will be allocated locally for employment in the Development Plan Document, there is no assurance that this will be taken up by businesses or provide sufficient local employment opportunities - especially in higher value activities. As a result, it is likely that residents of a new garden community would be attracted to seek and find work in the established employment hubs, which will require travel by car on the A12 or A120 or by train to London. The community will likely become a commuter dormitory settlement in the open countryside and the location would run counter to the important NPPF principle of reducing the need to travel.

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We therefore consider that this garden community is not deliverable. In particular, the essential advance highway and rail capacity improvements are far from certain. Given the current level of congestion and overcrowding, these are essential requirements and need to be in place before development commences.

Q.28 We suggest that Policy SP9 needs to give much clearer guidance about the intended relationship between Marks Tey and all existing settlements located in the area of search and not just Little Tey. CPRE supports bottom up growth generated through the neighbourhood planning process. New housing development is more likely to be accepted where local residents are involved in the process rather than having it imposed. The emerging Neighbourhood Plan for Marks Tey is suggesting that, in planning terms, it might be a wiser approach to grow Marks Tey for the benefit of local people rather than creating a stand-alone dormitory settlement at a distance from the centres of employment. Responses to the village questionnaire support this incremental approach.

Policy SP 10 - West of Braintree Garden Community

Q.30 We do not believe that a new settlement in open countryside to the west of Braintree is capable of delivering of 7k-10k dwellings in a sustainable way. Nor is it the right solution to meeting housing need. Such a large development would result in a substantial amount of harm to the natural environment (ie loss of valuable countryside, damage to the landscape, woodland and wildlife habitats) as well as the significant loss of high grade agricultural land. The quality of agricultural land is an important consideration to be taken into account in allocating land for development - not least given that it is a finite resource. This is crucial for the longer term issue of local food production and food security to meet a growing demand from an ever increasing population. In this respect, it is considered that the Plan is undermined by the fact that the proposed development of this (and the other proposed GCs) would result in the loss of large areas of high quality and versatile agricultural land - ie Grade 2 of the Agricultural Land Classification.

A major report by Essex CC in 2010 - the Historic Environment Characterisation Project - points out the significance of the historic landscape in the area of search. In particular, this identifies the heritage of villages such as Great Saling, which itself developed into a small nucleated village between the Hall and the Grove, both of which are Registered Gardens.

“The historic settlement pattern comprises greens and dispersed halls and farms many of which are listed. The roads are twisting and occasionally partially sunken. The fieldscape is largely comprised of irregular fields (these are probably of medieval origin and some maybe even older), interspersed by the occasional common field which had been enclosed by the late medieval or early post-medieval period. There are areas of surviving enclosed meadow pasture along the valley of the Pods Brook. There are a number of ancient woodlands.”

Rather, than destroy such natural assets (and high quality farmland), there is scope for further significant growth focussed on land in and directly adjacent to Braintree. In its response to the consultation on the Published Draft Local Plan, CPRE and other key settlements in the District proposed that a sequential approach to new development is more practical. We recommended a hierarchy of sites whereby those already identified in or close to existing towns should be allowed to develop first. When these sites have been developed sustainably and the homes occupied should the next phase of sites be released. This sequential approach should apply to the delivery of affordable homes, homes for the elderly and social housing which will meet the urgent needs of local people. In this way, supply would be matched closely to demand and the greenfield land of the proposed garden community should only need to be developed as a last resort. Given the GC would suffer from the inadequate rail connection (via Braintree to Witham) the reliance on car-based movement would be inevitable. The detrimental impact on surrounding villages resulting from the huge increase in traffic using the local road network could also be better contained and managed by such an incremental approach.