

COGGESHALL NEIGHBOURHOOD PLAN

Report to Braintree District Council of the Independent Examination

ADDENDUM

By Independent Examiner, Tony Burton CBE BA MPhil (Town Planning) HonFRIBA FRSA

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1. Executive Summary

1. This Addendum addresses the representations made by Artisan on behalf of the Vistry Group and by Strutt and Parker on behalf of the Chelmsford Diocese Board of Finance. These were not referenced in the report of my Examination into the Coggeshall neighbourhood plan provided in October 2020.

2. My consideration relates only to whether these representations have a material bearing on whether the Plan meets the Basic Conditions and my recommended modifications.

3. I conclude that the representations do not impact on my conclusion that the Coggeshall neighbourhood plan meets the Basic Conditions subject to the modifications recommended in my Examination report and that no changes to my recommended modifications are required.

2. Consideration

4. This Addendum considers the representations made by Artisan on behalf of the Vistry Group and by Strutt and Parker on behalf of the Chelmsford Diocese Board of Finance. These representations were not referenced in the report of my Examination into the Coggeshall neighbourhood plan provided in October 2020.

5. My consideration relates only to whether these representations have a material bearing on whether the Plan meets the Basic Conditions and my recommended modifications.

6. Both Vistry Group and the Chelmsford Diocese have interests in particular locations identified in the Plan – the designation of a Green Buffer on land adjacent to Colchester

Road (GB3) and the designation of land at Vicarage Field as Local Green Space (LGS1) respectively. Both representations also raise wider issues.

Policy 1

7. My report considers the Plan's approach to meeting housing need and tests the indicative housing requirement provided by Braintree District Council. It makes a number of recommended modifications to both Policy 1 and the supporting text. The report addresses the considerations raised by both Artisan and Strutt and Parker regarding the appropriateness of the approach to meeting future housing requirements and the treatment of the indicative housing figure provided by Braintree District Council. The combination of site allocations and expected supply from windfall sites is appropriate. I am satisfied with the evidence on which future windfall provision is based.

8. A number of representations on the Plan recognised the strategic planning context could change. This is not unusual and could be addressed through a future review of the neighbourhood plan. I consider the Plan's approach to be reasonable in relation to its current strategic context.

9. For the reasons identified in my report regarding the adequacy of the Plan to meet housing needs I do not share Artisan's view that the Plan "*ought to allocate more land for housing*". Nevertheless, my report also addressed the site selection process for allocating land for development. Contrary to views expressed by Strutt and Parker there is good evidence of an adequate site selection process.

10. Strutt and Parker also raises issues concerning the adequacy of the Sustainability Appraisal in addressing the full range of alternatives. I consider this in my report and conclude that while addressing more options would be ideal it does not have a fundamental bearing on the Plan's approach and should not be considered a critical failing.

11. I have reviewed the representations made by Artisan concerning the assessment of COGG 183 and remain satisfied with the approach. I note that the site is one of those subject to full assessment in the Sustainability Appraisal. There is no logic in the view that

because a settlement is identified as a Key Service Centre there should be potential development sites assessed as “Good”. Their absence could simply be a reflection of the sensitivity of each of the sites to material planning considerations. There is also no logic in the view that the assessment of a site as being “Good” should automatically result in its allocation. I consider the plan adequately addresses housing needs. There are also other sites which the site assessment identifies as being more preferable for housing development than COGG 183 which are also not allocated in the Plan.

Policy 7

12. My report considers the Plan’s approach to blue and green infrastructure. It agrees with Artisan’s view that the Policy is excessively prescriptive and lacks the necessary evidence to designate proposed links. It does not agree that the matters addressed in Policy 7 are strategic and not suitable for inclusion in the Plan. The recommended modifications to the Policy, supporting text and Figure 4 address points raised by Artisan.

Policy 8

13. My report considers the Plan’s approach to Green Buffers and considers it wholly appropriate. The Policy is consistent with the emerging Plan and complements it. I do not share Artisan’s view that it deals with strategic matters inappropriate to a neighbourhood plan. My report specifically addresses the merit of Green Buffer GB3 regardless of whether proposals for a new garden community at West Tey proceed. I share Artisan’s view that the purpose of the Policy needs greater clarity and address this in my recommended modifications. I also address the need to consider only those aspects of the assessment relevant to the Policy.

Policy 9

14. My report considers the Plan’s approach to designating Local Green Spaces. It concludes only the land at Vicarage Field is appropriate to be designated and agrees with the assessment provided to support the designation. I visited Vicarage Field during my visit to the neighbourhood area and concur with the assessment. National planning policy states that *“Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other*

essential services.” (NPPF, paragraph 99). This does not require an assessment of alternative uses as suggested by Strutt and Parker and there is no evidence it will result in less sustainable development patterns. The Plan makes reasonable provision for development and my report is satisfied with its approach to sustainable development.

Policy 14

15. My report considers the Plan’s approach to heritage and proposes modifications to meet the Basic Conditions. These agree with Strutt and Parker’s representations concerning the need to distinguish between substantial and less than substantial harm.

Policy 16

16. My report considers the Plan’s approach to protected views and is content with the approach. I visited PV1, as addressed in Artisan’s representations, during my visit to the neighbourhood area. I am content with the assessment of its value, especially at an important point in the approach to the built up area.

Other considerations

17. I have also considered Strutt and Parker’s representations that a relevant landowner states they were not aware of the Plan prior to its submission. This is clearly unfortunate but I remain satisfied with the approach to consultation. The Plan has had a good level of participation in its preparation and the process has involved a number of other landowners.

18. Strutt and Parker also questions the Plan’s approach to sustainable development and its conformity with the development plan. I address these issues in my report and am content with the approach. The Plan takes a positive approach and makes adequate provision for future development.

3. Conclusion

19. Having reviewed these representations I conclude that they do not impact on my conclusion that the Coggeshall neighbourhood plan meets the Basic Conditions subject to the modifications recommended in my Examination report.