

Coggeshall Neighbourhood Plan

The CNP Vision for Coggeshall: to protect and enhance this special place. We support the right types of development and those which complement and do not detract from this historically and environmentally unusual place.

We are not against appropriate development, even less are we NIMBYs.

The neighbourhood plan is well advanced and due to be complete by Spring 2018. At present the Parish survey is out to public consultation, a draft set of policies have been created, based on evidence collected so far, Landscape assessment surveys have been commissioned for areas where these are missing and the group has liaised with both the BDC, Parish Council and neighbouring villages. The NP planning group has consulted with the village through individual meetings, participation in village events, and a Roadshow in November attended by 250 people. A housing survey was conducted in June 2016 to every household in Coggeshall and got a 10% return. An economic survey of businesses in the village was conducted in May 2016.

Views expressed in this document are based on a clear understanding of the issues which the residents of Coggeshall have expressed in all the engagement so far. To date the group has not commented on this proposal as it is an unallocated site in the draft Braintree development plan. The Steering group agreed an approach to the numerous developers seeking planning permission in Coggeshall at the last meeting

"It was agreed that for sites allocated in the BDC draft plan it was sensible and possibly incumbent on the group to engage to influence the proposals in accordance with our emerging policies based on research and community consultation. In regard to unallocated sites within the parish we can object as a group, without engaging and so avoid the possibility of positively influencing development plans and therefore helping the developer to gain planning permission."

Members of the group have commented as individuals.

Consultation to date has demonstrated that the residents want to preserve the historic character of the village, protect the rural setting and maintain the strong sense of community.

The appeal site is unallocated, lies outside of the built envelope and is a green field site. 'the countryside' and its recreational value to the community was one of the aspects of living in the parish that is highly valued by those who live here.

Maintain Coherence and Landscape Integrity of Green Space around Coggeshall Village

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- Site is a vital green lung or buffer for a community subject to real pressure for development. When approaching the village from the A120 along West street the first section of road before the welcome sign has open agricultural land to the north and south. The landscape changes as one approaches the edge of the built envelope. It comprises of a mix of housing, farm units, the football field, the open space of the vineyard, the allocated brown field Dutch nursery site and the agricultural field of the proposed development site.
- The loss of this field, will further urbanise the character of West Street and contribute to the destruction of the countryside setting that is valued and enjoyed by this community. In their proof of evidence Liz Lake Associates argue that the adjacent built form will ‘contain’ the development linking up existing development to the east and west. The CNP group would argue that in fact it is this field which breaks up the existing built form. It inserts a ‘green lung’ into the streetscape and forms a crucial part of the Countryside setting of this rural village. To retain the character of the countryside setting of Coggeshall it is imperative that breaks in the urban form are retained, and retained not as formalised open space but as farmland.
- Maintain integrity and coherence of village envelope preserving established form of village
- Valued Landscape. In Braintree’s District Council’s Statement of Case (Appendix F) The council considers the site to be “valued countryside” The CNP concur with this statement. The site was designated as a Special Landscape Area as it ‘lies within the Upper Blackwater Special Landscape Area”. Special Landscape areas have now been superseded by Landscape Character Assessments. However, the CNP submit that if this was once a designated landscape, and there are no material changes to that landscape then this designation should continue to carry weight.
- The 2004 Braintree District Settlement Fringes Study assessed the landscape value of parcels 4e and 4d against set criteria as ‘moderate’. The GLVIA provide a range of factors against which the value of a landscape can be assessed. Each in turn have been discussed in Liz Lakes Proof of Evidence. The CNP recognize the changes to the landscape over time which resulted in the loss of historic fields, trees and hedgerows. We are aware of the noise from the A120. There will be other areas along the Blackwater valley with greater scenic appeal, or a more unique landscape type to increase its value through ‘rarity.’ It may be argued that it is not a ‘important example’ of the typical landscape character of the area. The impact of the mechanisation of farming, and the recent spraying of the site to remove evidence of a natural diversity of plant species (including bee orchids) still existing on the site prior to this appeal may demonstrate or have limited conservation value of the site.
- The very existence of this significant open space, currently a field does incontrovertibly add to the green setting of the village and helps distinguish the built - up area from the countryside. In complements the adjacent

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Vicarage Fields, due to be designated as a community asset and together these are substantial green spaces appreciated by residents, walkers and indeed by road users

- Existing modern housing developments in Coggeshall such as King's Acre, Jaggards Way and that near St Peter's Primary School are both smaller in size and scale and crucially are within the built-up area of Coggeshall
- Avoid unnecessary, undesirable linear development cum urban sprawl harming character of a special rural settlement
- Significant landscape amenity of unusual if not unique views from this part of Coggeshall to the south from this site across the attractive valley of the Blackwater, past the vineyard and the vista to the hills beyond
- Although the landscape amenity of this site may not be regarded as of national significance it is highly valued by residents and visitors to Coggeshall providing a buffer to delineate the built-up area; for offering highly valued rural views and an area very close to the village to walk and appreciate the rural environment. At the November 2016 Roadshow event people were asked what they liked and disliked about Coggeshall: 97% said the walk regularly and 46% walk beyond the village centre to the countryside
- Sense of Tranquillity. Paragraph 3.1.20 of Liz Lake Proof of Evidence, argues that the proximity of the site to the A120 means that it lacks a 'sense of tranquillity'. The A120 is very busy and noisy, and in the correct meteorological conditions the noise of the A120 is loud. However, this site remains a 'green lung' for the town. Residents do enjoy it as a green space, the access it provides to the open countryside and, visually the countryside setting it creates around the built envelope. In these ways, it delivers a sense of tranquillity to those who walk through it or drive past it. In the right meteorological conditions, it is peaceful. Developing this site would destroy the physical and mental health benefits that residents gain from this despite the proximity of the A120. Note there are proposals to re-route the A 120: 4 out of 5 options would take it away from its current route and would enhance the tranquillity of this area.
- Countryside Setting / Landscape Context. The CNP argues that this site does have great recreational value for the residents of Coggeshall. Despite the factors which at national level 'degrade' its 'landscape value', it is part of a countryside setting of the village which the residents of Coggeshall love and enjoy. It is a unique view within Coggeshall and a wide-open space which the people of Coggeshall can access and enjoy daily. We walk through it and drive past it. We appreciate it visually and physically. On these grounds, it is a highly-valued landscape in the local context. The CNP has evidence to support this statement. The site should be protected from development to preserve the countryside setting of the village and contribute to the recreational 'facilities' and health of the existing local populace.

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- Protecting this site from development is supported by the Neighbourhood Plan's suggested Environment and Heritage Objectives and Policies:
 - *EH 3: Green Spaces/Coalescence*. Objective: to preserve and enhance Coggeshall's USP {unique selling point} set in an open countryside setting: a) by identifying a green buffer around Coggeshall and Coggeshall Hamlet and b) identify, preserve and enhance landscape views accessed by public footpaths, bridleways and cycleways and
 - *EH 5: Protect and preserve all agricultural land, private and public open space* through a presumption against development on unbuilt sites between the built-up area of Coggeshall and north to the A 120

Evidence from engagement so far: At the November 2016 event questions about countryside showed 97% walk regularly with 48% of them walking beyond the centre of Coggeshall - (to the countryside). This is evidence that that people both value the countryside and utilise it.

Community support for key views:

- The appeal site is an open field on rising ground gently sloping up from West Street to the north of the River Blackwater. From the site there are key views from PRoW 50 & 17 south across the valley. The Essex Way, runs parallel to PRoW 50 on the southern side of the valley looks across to the appeal site. In addition, there are further public views from West Street, the A120 and Robins Bridge Road now used by walkers.
- It is noted that the proposed development is located in the 'least sensitive parts of the site' (parcels 4d and 4e identified in the 2004 Landscape Capacity Analysis) and "on lower ground close to the existing visible urban edge, where there is a great degree of containment and from where there are no prominent views" (Para 1.1.1 Liz Lake Proof of Evidence) From this lower vantage point, adjacent to West Street, the views across the valley are more limited, the trees along the river corridor interrupt the long view. However, further up the slope from PRoW 50 there is a long, cross valley view and a shorter view down onto the distinctive landscape of the Vineyard. This view is recognised and enjoyed by the community. There is no doubt that the development proposals would block this view as PRoW 50 would be lost amongst the housing. The cross-valley view from PRoW 17 would also be blocked to the south and west.
- This is the only raised area of land in this vicinity where there is a clear, uninterrupted view from one side of the valley to the other. Objections raised in relation to the loss of this open space focus on the views and the characteristic, open and wide horizons typical of the East Anglian landscape. This is a key source of enjoyment for the existing residents of

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Coggeshall and it is a unique view within walking distance of the built envelope.

- At the November 2016 CNP community consultation day the community was provided with a map of the built envelope and its surrounds and asked to place stickers on the map to identify key views that there are important to them. The cross-valley view from PRoW 50 was identified by members of the community, as was the view from the opposite side of the valley on the Essex Way. The vantage points take advantage of the break in the built form to enjoy the long distance cross valley view. (see appendix 1)

Protect Unusual Environmental Heritage of Medieval Coggeshall

- Proposed site provides a buffer to the medieval core part of Coggeshall being sited between Highfields Farm {reputed Roman occupation as a burial site}; old Isinglass Works {supplement for beer} and the start of the Coggeshall Conservation Area
- West Street follows route of ancient Stane Street: route of Roman Road from Camulodunum {Colchester - England's oldest town} west to Verulamium {St Albans} whose archaeological provenance has been identified. There is evidence of historic significance of this part of the village: archaeological evidence of possible Iron Age and Roman occupation: quoted by CPC objections stating ECC Historic Buildings and conservation also objected
- Allowing this Appeal would be the start of building on the green land surrounding the medieval core of the village: residents are worried about transformation or 'suburbanisation' into a standard, bland commuter town e.g. note the major diminution of once historic Great Dunmow into a 'Tesco style' town to the west on the A 120. Approval of this Appeal could demonstrate a precedent for hard to resist further developments between the Village and the A 120 by-pass to the north: Note the 2016 BDC Call for Sites map shows possible interest in developing every site from the NW to the NE of Coggeshall within the A120 ring road: map is attached.

Evidence from the engagement so far: the following are quotes from the Queens day engagement in June 2016 in response to the question, "What do you see as the greatest threat to the village?"

"Development of green field spaces outside of current constructed boundary."

"Over development and the green spaces around it threatened"

"Becoming a dormitory town"

"Over development"

"New housing developments"

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“Loss of green spaces”

“Building on greenfield sites, especially fields currently used by dog walkers or near to housing. The infrastructure can’t cope with more people.”

“Over development, our green spaces being encroached on with housing”.

“Large housing developments that negatively affect the integrity of the market town”

Undesirable and Unsustainable in terms of Parking, Highways and Traffic

- Scheme only proposes a single primary entrance/egress onto already highly used and at times congested West Street where parking on the road means only a single carriage way is available for much of the time. The regular bus route is already consistently held up on West Street which cannot be widened.
- Traffic on West street will increase with the already approved Dutch Nursery site by at least another 150 cars using the street regularly
- Proposed scheme with a single access will impose an unnecessary and undesirable additional burden on West Street which is already overburdened as both a residential street and acting as one of only three east - west access routes into, through and out of Coggeshall
- West Street is the preferred entrance to the Village for most/nearly all traffic from the west coming from Braintree and the M11 etc. and for much traffic heading south to Kelvedon. Alternatively, all such traffic would need to unnecessarily travel further east along the A 120 to the other two entrances from the west or north but all such vehicles would then have to drive through the centre of the village to reach West Street adding to noise, vehicular pollution and pedestrian safety concerns in the heart of the community
- The Pigeon development of 106 new houses would likely result in some additional 200 or more residents’ vehicles plus visitor traffic and how much extra traffic do the applicants forecast from the 836 sqm business hub and visitors to the woodland and public open space? This is likely to add to congestion and traffic risks both within village and add to pressure on junction where West St joins the A 120: already a safety hazard
- NB Coggeshall Parish Council did comment negatively on the original application including on apparent “very dangerous second junction” onto West Street via the Highfields private road
- The 2011 Census showed that the level of car ownership per household in Coggeshall is higher than the district and county averages - 34.5% own 2 cars or vans compared with 29.6% average in Essex and 8.3% own 3 cars or vans compared with 7.4% average in Essex. The census shows that residents in

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Coggeshall ward were more likely to travel to work by train than the district and county averages, 13.1% compared to 8.5% in Braintree District.

- Public transport provision is limited to one scheduled bus service, no. 70, which passes through Coggeshall and runs between Colchester and Chelmsford. There is no scheduled bus service between Coggeshall and the main line station at Kelvedon. Travel to and from the station is by car or by the Community Bus. The Community Bus is driven by volunteers, is a 16 seat mini bus and operates 9 runs to and from Kelvedon in the morning and 7 in the evening. It therefore caters for around 100 commuters. There is a shortage of volunteer drivers and the service is oversubscribed. There is little capacity for absorbing the likely increase in commuter demand for transport to and from the station. The development will therefore increase traffic congestion in the village centre and put strain on parking facilities at the station which are constrained and at times over-subscribed

Proposal is unsustainable in terms of additional infrastructure demands placed on the community and public funds given levels of contributions offered

- Additional demand will be created for primary, secondary and further education both from the extra 106 houses plus the labour and skill needs of the business hub. Additionally, extra demand will be placed on the GP surgery - already unable to accept any new patients - and for water & sewage, roads, parking and for public transport etc. Note the existing community bus service from Coggeshall to Kelvedon Station is already constrained given the number of volunteer drivers. What percentage of the proposed new residents would be expected to commute out of the village by car or bus and/or rail and what proposals are made to enhance such capacity?
- To what extent have *each of these additional demands* been quantified by the applicants including effects of building and hardstanding on drainage in the village, given extant flood risk?
- Honeywood School is already struggling with its current buildings - several of which are said to be inadequate. 108 new houses could eventually result in a possible additional demand for secondary school places of say 100-200 but if these were accepted other existing or potential pupils might be excluded. Specifically, how does the applicant propose to add to secondary capacity within the village or will the extra pupils have to be bussed out of Coggeshall and if so to where?
- What specific contributions have been offered toward the cost of every significant additional infrastructure requirement generated by this development? Developers of the nearby Dutch Nursery site have been asked by

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ECC to make a contingency allocation of some £250 k towards cost of a possible new secondary school

- What are the specific and how firm are the guaranteed levels of affordable and/or social and/or shared ownership housing of the 98 dwellings proposed? Will any such commitments be limited by possible concerns that providing affordable housing might have on the perceived financial viability of the scheme as a whole?

Inappropriate site, scale and likely housing mix and design given CNP draft Housing Policies and Consultation

- Analysis of Census data, household formation and projections over the BDC Local Plan period to 2033 suggests a total new housing demand for all of Coggeshall of some 121 to 374 dwellings, so providing up to 100% of this demand on one such greenfield site is neither necessary or desirable
- CNP analysis of population growth from the 2001 to 2011 census indicate an average annual household growth of 2.66% indicating a minimum demand for 121 new homes by 2033. This rises to a possible 177 based on the number of new homes already adopted [indicative support but not formally approved] by BDC of 52. Fifty one new homes were completed 2012 - 2015 i.e. some 10 per annum which could suggest a total need of an extra 170 houses by 2033. Total population in the Parish grew by 9.02% between the 2001 and 2011 Census suggesting a maximum additional housing demand of 374 homes by 2033.
- The National Planning Policy Framework requires the relevant Council and its Plan to identify a Housing Land Supply and in greater detail for the first 5 years of the Plan. CNP argues it is not responsible for the absence of this plan and allowing this Appeal would prejudice coherent community planning in the village - see draft Policies below. Allowing the appeal would undermine the plans that may be included in the anticipated BDC District Plan due to be adopted in just a year. The timing of the appeal would indicate that perhaps the Applicant has timed their application to take advantage of their non-completion.
- By allowing large inappropriate sized and located developments such as this, would undermine and indeed negate much of the very raison d'être for the community producing its own Neighbourhood Plan on which it has been working assiduously for over 2 years since early 2015

Evidence from the engagement so far: The CNP Housing Survey, consultation at the Queen's Birthday Fete and at the Village Hall Roadshow all indicated significant if not strong community support for the following draft Housing Policies:

- *H2: Large scale developments on greenfield sites to be avoided*

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- *H3: New housing should be provided on infill or brownfield sites within the Village*
- *H4: there should be a substantial proportion of social or affordable housing: on sites of 4 or more dwellings this should be 40%*
- *H5: All new homes should complement or add to the unique built environment and landscape heritage of Coggeshall*
- *H6: Some new housing should be designated for local residents and their children*

The CNP Housing Survey April to June 2016 showed 54% of 213 respondents favoured small housing developments i.e. 0-50 houses. And 56% of 264 respondents felt large developments were “nor suitable”.

National Planning Policy Framework

We believe these comments do accord with the NPPF, thus:

- “ where development plan is absentgranting planning permission unless any adverse impactssignificantly and demonstrably outweigh the benefits” para 14
- “ Core planning principlescontribute to conserving and enhancing the natural environment” para 17
- “Plans should respond to ...local character and history and reflect the identity of local surroundings” para 58
- “ would undermine the potential of a Local Green Space designation” para 77 and finally
- “ Local planning authorities ... should have ...evidence.... to predict unidentified heritage assets” para 170

Conclusion

A Neighbourhood Plan group is charged with determining the development of the parish for the health and wellbeing of its residents today, and for the life time of the plan. The draft Braintree District Plan has allocated sites for development within the Parish of Coggeshall. This is an unallocated site and in accordance with the evidence massed to date we determine that the development of this site would not meet the needs or increase the wellbeing of this community. Rather it would have a detrimental effect through a significant diminution of the landscape setting of the village and the associated recreational and visual benefits we derive from this site in its current form.

The onus is on the applicant to demonstrate that this proposal fully accords with the NPPF in all material aspects. If there is reasonable or substantive doubt, this Refusal should be upheld or the Applicant could be advised to make a non-speculative application i.e. given that within a year both the BDC and CNP should be adopted

The below is a sample of the quotes from the Queens Day consultation (June 2016) in response to the question "What do you Love most about Coggeshall?"

"Being close to rural, green areas."

"Rural village feel"

"Character & Countryside"

"Footpaths and local walks"

"Village Setting within all green surrounds"

"Our rural village with its Green spaces"

"I just love it - walks, beautiful church, large garden green space"

"Surrounded by beautiful countryside"

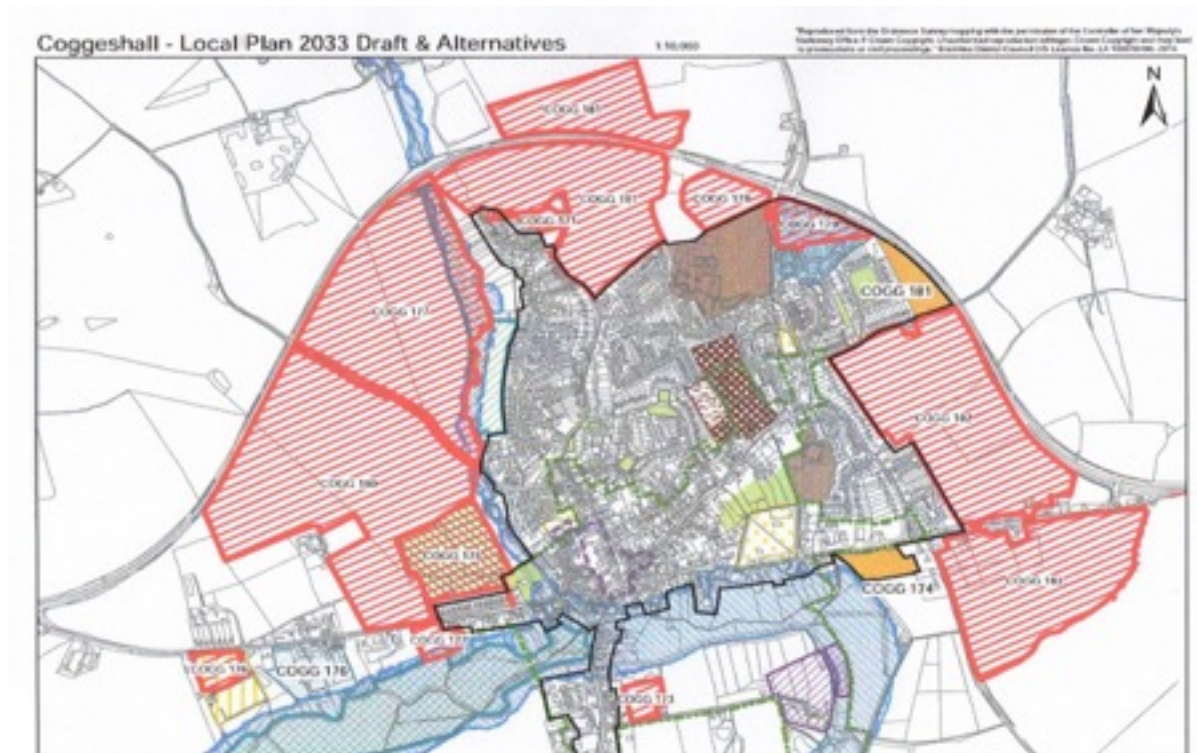
"Green spaces /places to walk that are easily accessible"

"Open spaces, beautiful scenery"

Appendix 1

Map with stickers used by Coggeshall residents to show their favourite views at November 2016 road show

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Tom Walsh CNP 5 May 2017