



27 July 2017

The Planning Policy Team
Braintree District Council
Causeway House,
Bocking End.
Braintree,
Essex CM7 9HB

By email to localplan@braintree.gov.uk

To whom it may concern,

Re: Public consultation of the Publication of Braintree Draft Local Plan

On behalf of the Coggeshall Neighbourhood Plan group (CNP), I thank you for the opportunity to comment on the BDC Draft Local Plan. The Steering group recognise the presumption of sustainable development and wish to contribute positively to the draft plan. CNP has recently conducted a Parish Survey of all properties in the parish to begin to test public views of the emerging local planning policies. This builds on a series of engagement events over the past 18 months. During this time we have established a clear idea of the issues which the public deem important and specific policies and design guides are being produced over the summer of 2017 in response.

We have examined the BDC draft plan and wish to submit the following, on the basis of the soundness of parts of the proposed plan:

PART ONE

Policy SP6 Place Shaping Principles

The first sentence is very loose - how do BDC propose to "meet highest standards of urban and architectural design"? Design codes are mentioned but are not specific - **CNP suggests mentioning the Essex Design Guide and local Town and Parish Design Guidelines?**

Based on the above CNP would suggest that any major developments i.e. over 30 units be subject to the Design Review body - this is being encouraged through the NPPF.

Under the enhance public realm point, CNP would add co-ordinated wayfinding and signage to this list.

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On the integrated network point, CNP would caveat that this must be to the benefit of the local community - wide open spaces do not always provide a benefit.

On the environmental point, BDC should include reducing light pollution where possible.

There is no mention of streetscapes and being visually attractive. Also provision of safe / defensible space should be included - both are mentioned in the NPPF.

Garden communities. Coggeshall, Feering and Kelvedon Neighbourhood plan steering groups have met and noted an area of great concern to us all regarding green buffers and coalescence. Each Neighbourhood plan will submit separately but we have common concerns about Policies SP 7 and 9 and LPP 72.

Policy SP 7 Development & Delivery of New Garden Communities in North Essex

In this June 2017 publication draft Local Plan document, the proposed Colchester/ Braintree borders garden community is stated as delivering an overall total of between 15,000 - 24,000 homes. The BDC draft local plan of June 2016 and Lord Kerslake's review, published in January this year, quoted an overall total of 15,000 - 20,000 homes. The proposed maximum size of the Colchester/ Braintree borders garden community has grown and is now significantly larger than the other two North Essex garden communities and potentially larger than Braintree, the largest town in Braintree District. The Colchester/ Braintree borders garden community is also in a location that currently has no significant employment base. Comparing the proposed Colchester/ Braintree borders garden community with the other two North Essex garden communities:

- Tendring/Colchester Borders: 7,000-9,000 homes, close to the edge of Colchester, the Hythe railway station and close to the University of Essex and the "Knowledge Gateway" development.
- West of Braintree: 7,000-10,000 homes, accessible to the Braintree Skyline business park, the M11 and Stansted airport & its employment & business opportunities. In the June 2016 BDC draft Local Plan an overall total of 10,000 - 13,000 homes was proposed for this garden community, which has now been downsized.

The sizes of Witham and Braintree, the two largest population centers in Braintree District, are:

- Witham 2015: 10,853 households & 25,353 population.
(numbers of households approximates to numbers of homes / dwellings)
- Braintree 2011 census: 18,340 households & 44,499 population.

The 9,000 homes difference in the proposed size of the Colchester/Braintree borders settlement between the lowest planning figure and the upper figure in the 2017 draft, is in itself about the size of each of the other proposed North Essex garden communities, and about the size of another Witham. This is added onto a proposed garden community that is already larger than Witham in 2015. The final proposed Colchester/Braintree borders garden community at 15,000 - 24,000 homes would be the size of another Braintree. Is this realistic and deliverable?

CNP asks why the size of the Braintree / Colchester borders community been increased compared to the June 2016 proposal / January 2017 Lord Kerslake peer review? Why is this garden community so much larger than the other two proposed North Essex Garden Communities? The London-Colchester

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and beyond railway line still has the same capacity constraints, the adjacent A12 and A120 Highways England trunk roads also still operate at over 100% capacity for several hours a day, with queuing at the MarksTey A12/A120 junction (junction 25) and the future home requirement has not increased.

CNP asks also whether it is sound to plan to encompass such a large possible spread in homes in the Braintree / Colchester borders garden community proposal - especially when looking 15-30 years in the future.

CNP OBJECTS to a Braintree / Colchester borders garden community with such a large number of proposed homes (15,000 - 24,000 homes)

Is it realistic and deliverable for THREE new garden communities to be planned, costed/ financed and delivered in the two 15 year periods - up to 2033 & then post 2033 - together with all the necessary infrastructure improvements, bearing in mind that the A12 & A120 are Highways England roads and railway and/or station changes have to be negotiated with Network Rail and the local Rail Franchise operator. Lord Kerslake in his peer review (published in January 2017) described West Colchester / Marks Tey as ... *"the largest and most complex development proposed"*. Also... *"West Colchester/Marks Tey would be a large and complex project to deliver on its own, quite apart from the other two. It is absolutely dependent on upgrading the A120, and has complex land ownership"*.

Passing loops / extra lines to provide capacity improvements on the London-Colchester railway line have been under discussion for many years as has a new Beauligh Station near Boreham / NW Chelmsford. The A12 Boreham-Marks Tey (J19-25) widening scheme is in the current Highways England RIS1 2015-2020 investment programme. However the totality of the scheme including the junction improvements required to achieve expressway standard, will extend into RIS2 2020-2025. RIS2 projects are some time away from being decided on. The bringing forward into RIS1 of the widening of the A12 Colchester bypass, junctions 25-29, has recently been announced. The A120 route widening and improvement to expressway standard from the Galleys Corner roundabout, SW of Braintree, to the Marks Tey A12/A120 junction (J25) is not yet in any Highways England investment programme although Essex County Council are working hard to ensure that it is included in the RIS2 2020-2025 works programme.

CNP asks that the Braintree / Colchester borders garden community:

- reverts back to the more manageable & so deliverable originally proposed lower point figure of 15,000 new homes. It is not clear what has changed in the evidence base to require the proposed increase to 15,000 - 24,000 homes from 15,000-20,000 homes. The minimum number of homes that BDC state need to be delivered in the plan period 2013-2033 has actually decreased marginally from 14,365 in the June 2016 BDC draft Local Plan to 14,320 in this BDC draft Submission Local Plan (policy LPP17).
- that development does not start until the route and scheme details of the A12 widening / improvement to expressway standard are signed-off, completed and operational around Junction 25 at Marks Tey (both the J19-25 and the J25-29 schemes).
- that development does not start until the A120 widening / improvement to expressway standard route and scheme details are signed-off, completed and operational around Junction 25 at Marks Tey.
- that development timetable takes account of capacity improvements being operational on the London-Colchester railway line.

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colour towards the outer boundaries. The legend defines this purple area as 'garden communities'. The distinct impression given is that this shaded purple area is the proposed extent of the garden communities. As you will be aware this area runs into the very eastern edge of the Coggeshall, Feering and Kelevdon settlements, from the junction of Colchester Road with the A120, and along the edge of the Feering Road.

The CNP has read and seen documents that indicate the built envelope will be further away from the Parish, but this purple shaded area gives us grave cause for concern. If this purple area is not reduced and a green buffer zone is not indicated on these preliminary plans then when this map is a legal document it will be cited as evidence to expand the boundaries of the garden community. Despite all previous background evidence, this would be an easy case for a barrister to argue in future years, as and when the development boundary of the garden communities or indeed of our communities is once again proposed for more development.

CNP submits that these maps should be amended to clarify the built envelope. BDC and ECC should establish in the preliminary planning phase (now, before the publication of the Local Plan), a significant green buffer between existing communities and the new garden communities to ensure coalescence between new and old settlements will not take place after the lifetime of this plan. In addition, we submit that to support the maps a minimum distance should be added into the text of the Local Plan to ensure that there is no confusion.

Section 6.18 (pp31) Bus, Walking and Cycling

CNP supports the aim to connect settlements with Cycle and Bridle ways, this could be strengthened **by connectivity with the national cycle network**. One of the ideas put forward by CNP has been connectivity between Kelvedon and Coggeshall and this has topped the poll of ideas which Coggeshall residents would like to see developed. In addition connectivity with other local settlements and the national cycle network at the Flitch way have been popular

Page 39, Protect the amenity of existing and future residents with regard to noise, vibration, smell, loss of light and overlooking. As a comment CNP would support this aim especially with regard to development of the road networks, recognising that this is outside the scope of the BDC plan.

PART 2.

Policy LPP1

Development boundaries This is potentially very important for Coggeshall, the boundary drawn around Coggeshall is the existing village boundary. All parcels of green belt land within the ring road and the development boundary have development proposals against them. **The CNP would want to support existing green belt inside ring road and are preparing green buffer proposals for the neighbourhood plan based on community engagement for particular parcels of land.**

CNP would also like to see the cricket field identified as a formal recreation space.

6. A Prosperous District

Policy LPP3 - Employment Policy Areas

CNP agrees that employment policy areas identified on the Proposals Map in the Plan, including the Coggeshall Industrial Estate, should be permitted and retained. However vacant units should be monitored in order to ensure they are fully utilised and still needed.

Policy LPP8 - Rural Enterprise

CNP agrees that outside of development boundaries, proposals for small-scale commercial development, which involves the conversion and re-use of existing buildings will be considered acceptable. We would not wish to see new rural industrial estates, but would encourage small scale business units.

Policy LPP9 - Tourist Development within the Countryside

The CNPG supports proposals for new tourist accommodation and facilities, within the countryside, subject to the criteria outlined in the Plan. This will support local businesses in heritage areas such as Coggeshall and strengthen the economy of the village.

Policy LPP 12 – District Centre

It is not clear if this policy also applies to the Local Centres, such as Coggeshall, identified in the plan.

POLICY LLP 17: HOUSING PROVISION & DELIVERY

REF TO APPENDIX 3 – Residential Housing Allocation

HOUSING ALLOCATION FOR COGGESHALL

- Cogg 174 land on the south side of East St (Cook Field) is allocated 25 residential properties.
 - In June 2017 the BDC draft local plan had allocated 12 residential properties to this site.

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- Cogg 181: Land between A120 and Tey Road has been allocated 11 residential properties and granted permission for 11 residential properties
- Cogg 506: Dutch Nursery West Street has been allocated 60 residential properties.
 - In June 2017 the BDC draft local plan allocated 30 residential properties to this site.
 - An application (17/00350/OUT) for 74 residential properties as well as associated business units is at the time of writing lodged with BDC for planning approval.
- Land East of Tilkey Rd, Coggeshall (16/00059) was recently approved at appeal and adds another 5 residential properties to the total number.

In June 2017 the total allocation for Coggeshall was 54 residential properties. The allocation has risen 1 month later to 97. Please see 'screen shot' A taken on the 09/06/17 and 'screen shot B' taken on the 20/07/17.

Screen shot A

15	COGG 174	Cookfield, East Street Coggeshall	12
15	COGG 506	Dutch Nursery West Street Coggeshall	30
15	COGG 181 (pt)	Land between A120 and Tey Road Coggeshall	10

Screen shot B

BRS 2	Land North of St Johns Avenue, Braintree	48
BRSO 152	Land at Railway Station, Braintree	100
COGG 174	Land on the south side of East Street, Coggeshall	25
COGG 181	Land Between A120 and Tey Road	11
COGG 506	Dutch Nursery West Street	60
CRESS 192	Land east of Mill Lane, Cressing	118
CRESS 201	Land at Appletree Farm, polecat Road, Cressing	70
EAR 3	Land at Station Road	56

The quota for Cogg 174 and 506 have both doubled in size. **The CNP requests an explanation to inform us why BDC now believes that these two sites can now accommodate twice the number of residential properties when only a few months ago they had been assessed as accepting half that amount.**

Cogg 506 has an application pending a decision for 74 residential properties – 14 above their allocation. However CNP has discussed the site with the developers and agreed a proposal for 67 properties in line with our policy of engaging with any developer on an agreed allocated site

The CNP requests an explanation for the increase in the quota for Cogg 506, particularly given the stated preference by residents and the CNP is to retain as much as possible of the western edge of the site, or the 'pony fields', as open green space to create a 'green lung' or green frontage onto West Street, and form a wildlife corridor from the River Blackwater to West Street to link up with PRow on the northern side of West Street.

In the case of Cogg 174 this is an edge of settlement green field site. When assessed in its landscape context the proposed density would be entirely out of character with appropriate edge of settlement

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development which takes the form of lower density, scattered dwellings within green space, garden / 'rural land' with adequate room for tree planting.

The CNP submit that the number of residential units per hectare for Cogg 174 must be reduced back down to the original to reflect an edge of settlement development. That would mean a reduction from 20 units per hectare back down to a maximum of 10 units per hectare.

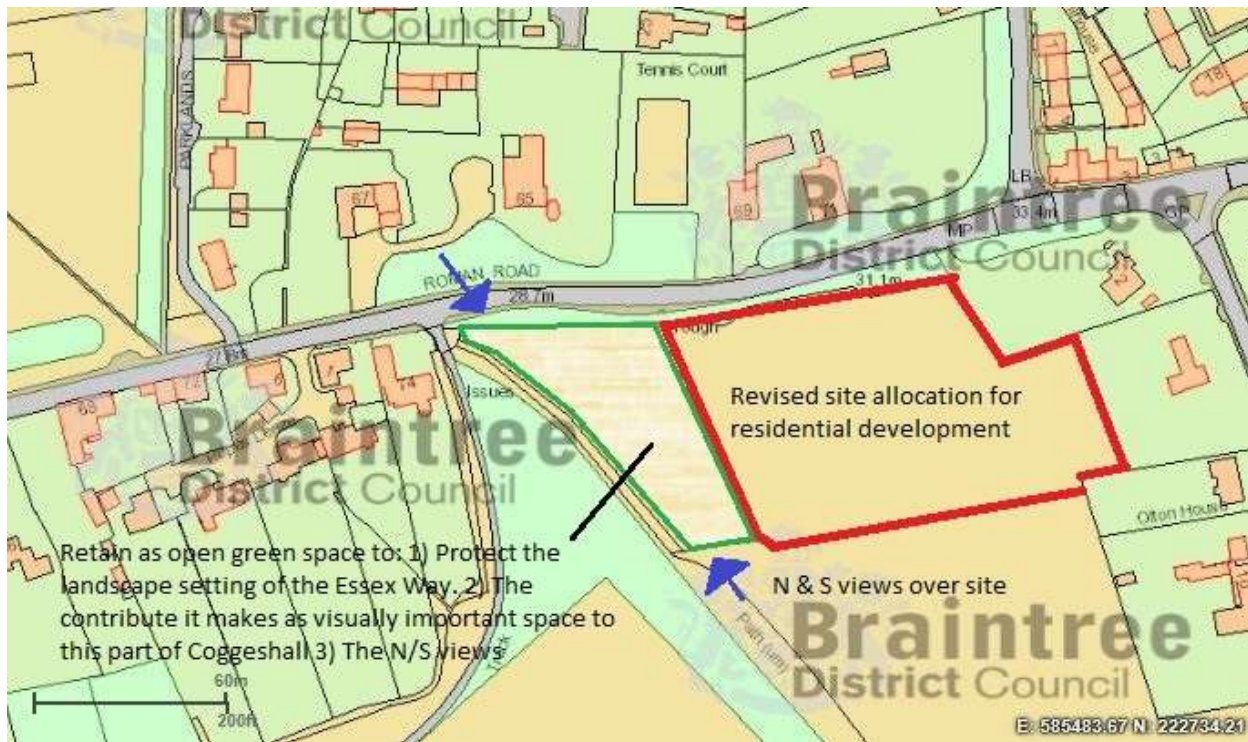
Policy LPP 33 - Affordable Housing

CNP endorses the policy that affordable housing will be directly provided by the developer within housing schemes at the targets identified in the Plan of 40% for villages such as Coggeshall and with a threshold over 11 homes. However it is unclear what target applies to proposals such as COGG 181 which is exactly 11 homes.

DETAILED COMMENT ON RESIDENTIAL HOUSING ALLOCATION FOR SITE COGG 174 LAND ON THE SOUTH SIDE OF EAST STREET, COGGESHALL. (Cook Field)

This is an allocated site in the draft BDC local plan. The CNP do not ask for it to be removed from Coggeshall's allocation as we understand and appreciate the need for sustainable development and for the necessity of BDC to achieve its 5 year land supply. We do submit however that the western portion of this field adjacent to the Essex Way should be protected from development.

Plan showing the area proposed for protection from development in Cogg 174 – Cook Field.



On the basis of the evidence listed above, the loss of less than half the allocated area of this field for residential development should not materially impact upon the overall allocation for Coggeshall, especially given the previous allocation to meet the 5 year landscape supply was 54 which has now risen to an unexplained 97 excluding the additional homes approved and submitted for planning on the Tilkey Road and Dutch Nursery sites respectively.

The CNP therefore submit that Coggeshall Parish will meet the number of new homes designated for the parish and that the area of land identified above can therefore be removed from the total allocation.

Coggeshall is a small town in a rural setting.

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Part of the 'USP' identified by the CNP Steering committee and used in our logo is 'countryside'. Coggeshall village sits within a rural setting and part of the groups remit is to help preserve the rural setting of the village as it is one of the key reasons why people love living in this settlement.

The CNP acknowledge that this site does meet sustainable development criteria in that it is within walking distance of the village centre. The loss of another field or 'green lung' along one of the approaches into the village centre and within walking distance of the village centre, together with the loss of the visual amenity of viewing this field by foot or car, from the road or the Essex Way will increase the urbanisation of the landscape setting of the village.

Physical and visual connection within green space is now recognized as a major factor in the physical and mental health of a community and it is imperative within an increasing urbanized society. The CNP maintains that these immediate physical and visual connections to 'natural' green space close to the village center are necessary to maintain the health of the local population.

In BDC's Draft Local Plan, one key objective is 'A healthy and active district', the Essex Way is noted as important in 'encouraging walking in the countryside'. In addition, the following issues are identified as having an impact of physical and mental health:

- *The location, density and mix of land uses;*
- *Street Layout and connectivity;*
- *Open and green space*

Each of these ways positively impacts on physical and mental health could be furthered by protecting the western edge of Cogg 174 from development.

The 'deallocation' of this portion of Cogg 174 would also further BDC policy LPP 53 – Provision for Open Space, Sport and Recreation and help achieve the below stated policy.

- *Small areas of open space in urban areas that provide an important local amenity and offer recreational and play opportunities*
- *Areas of open space that provide a community resource and can be used for informal or formal events such as community, religious and cultural festivals*
- *Areas of open space that particularly benefit wildlife and biodiversity*
- *Areas identified as visually important on the proposals map*
- *Play areas, and sport and recreation grounds and associated facilities*

The CNP therefore submits that the western edge of Cogg 174 should be protected from development.

Visually important space / Views

This area of land has been identified by the CNP as visually important space. On approaching the site by foot from the North and South along the Essex Way, the view opens up across its western edge.

The view to the south is open (See Cogg 174 & the Essex way looking South below) and very attractive looking beyond the field boundary to the adjacent paddocks. There is an immediate 'sense of space' and enjoyment from stepping from the road into a rural setting.

Cogg 174 & the Essex way looking South.



The view to the north (Cogg 174 & the Essex Way looking North a & b below), looks over the field to the established hedgerow and mature trees which mark the site boundary with East Street and beyond to the mature landscape setting comprising of forest scale trees within the garden of 'The Mount', a large house within Coggeshall's conservation zone. In the winter months, the roofline and upper story of this Victorian house is visible and it is a highly attractive land mark when walking along the public footpath. In the summer the mature forest scale trees against the skyline provide an attractive backdrop to the 'cross field' view.

Cogg 174 & the Essex Way looking North: A



Cogg 174 & the Essex Way looking North: B



The evidence set out above identifies this western corner of Cogg 174 as a visually important space. The CNP therefore submit that this section, the site should be unallocated for development and remain open in character.

Impact on the Essex Way.

The negative impact of development upon the Essex Way is a key consideration in the development of this site. The photographs above looking South along the Essex Way clearly illustrate the close proximity of the field boundary to this nationally recognised public footpath. Development adjacent to a public footpath all too often damages the visual aesthetics of the footpath and its performance as a piece of green infrastructure.

The images below of two public footpaths along the Essex Way, the second in Coggeshall, illustrate the negative impact of development adjacent to a public footpath. In Coggeshall we have numerous examples of PRoW which are now enclosed by boundary fencing or walls to both sides.

The Essex Way, Great Tey.



The Essex Way from St Peters Road, Coggeshall.



As part of a green infrastructure network, a public footpath fulfills numerous functions. It provides a physical recreational resource for the local community and means of travel which can be used by local people instead of driving. It also provides trees, hedgerows and open space that act as a wildlife corridor. Should the edge of this site become a hard-urban edge to one side with close boarded fencing or similar, as seen in the examples above, the aesthetic appeal of this stretch of footpath will be destroyed and people will be actively discouraged from walking along this section of footpath. **The CNP therefore submit that to ensure the Essex Way is protected from the negative impacts as set out above, the western section of Cogg 174 as indicated on the plan should be unallocated.**

Tourism.

Coggeshall parish has one of the largest number of public footpaths in the region. Coggeshall CNP would like to promote the footpath network to attract tourists. The Essex Way is a national footpath the length of which is actively used. Should yet another stretch of this footpath be visually negatively impacted by development it will advance the cumulative negative impact by reducing the attractiveness of Coggeshall Parish and of Essex to increase tourism.

The CNP submit that the potential negative impact of the development of Cogg 174 on the Essex Way supports the conclusion that the western portion of the site as noted on the 'Plan showing the area proposed for protection from development in Cogg 174 – Cook Field' should be removed from the housing allocation.

Braintree District Settlement Fringes: Evaluation of Landscape Capacity Analysis for Coggeshall 2015

Cogg 174 was identified as part of parcel 2d in the Evaluation of Landscape Capacity Analysis for Coggeshall 2015. Cogg 174 is described in para 4.22. See below.

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“4.22 To the south-west of Coggeshall Parcel 2d has a rural character with a tranquil riverside walk including part of the Essex Way path. The area is strongly influenced by the historic fringes of the settlement, with historic field enclosures, Scheduled Monuments and Listed Buildings. The River Blackwater provides a strong visual feature containing the settlement and reducing visual connections with the urban fabric. These factors reduce the capacity of the Parcels to accommodate development despite the framework provided by good quality, dense vegetation.”

Extract from Evaluation of Landscape Capacity Analysis for Coggeshall 2015

Coggeshall Neighbourhood Plan: Landscape Sensitivity and Capacity Appraisal 2017

Cogg 174 was identified as parcel F in the Coggeshall Neighbourhood Plan: Landscape Sensitivity and Capacity Appraisal 2017. Cogg 174 is described in para 5.6.6 See below.

“Parcel F

5.6.6 Parcel F, known as Cook Field, has been allocated for residential development within the Draft Local Plan produced by Braintree District Council (Site reference: Cogg 174: land on south side of East Street, Coggeshall). The parcel abuts the settlement of Coggeshall and is adjoined on its eastern edge by large gardens containing mature trees. To the north, the parcel borders East Street (B1024) which forms one of the main routes into the village. It consists of a single large field with mature vegetation on the boundaries which contains views to some extent. The parcel forms part of a wider area of open, agricultural land on the fringes of the Blackwater Valley. The Essex Way follows a line through this area, passing along the western edge of the parcel.

5.6.7 Whilst the parcel has been allocated for development consideration needs to be given to the effect of any development proposals on existing landscape features including the mature vegetation on the northern site boundary adjacent to East Street. This vegetation should be retained wherever possible for its contribution to the character of East Street. Development should be set back from East street in order to safeguard the character of the streetscape, and to limit effects on the setting of the Conservation Area, which lies immediately to the north. Views from the Essex way are currently open, so that the site is perceived as a single field bounded by mature trees. The mitigation measures for any new development should include an open buffer zone adjacent to the Essex Way to protect existing views north and south from the Essex Way, and the landscape setting and character of this section of the path. Landscape buffer planting, using native trees and shrubs, should be established at the southern edge of the developed area to reduce the impact of new buildings in views from the Essex Way, and to help assimilate new built form into a well-vegetated settlement edge.”

The Landscape Sensitivity and Capacity studies above detail the sensitivity of this site to development, and describe Cook Field in its historical, visual and ecological landscape context. The 2017 study states that mitigation measures should ‘protect existing N/S views’ in an ‘open buffer zone’ adjacent to the Essex Way.

We submit that based upon the above Landscape Sensitivity and Capacity Appraisals above, that BDC should remove the area of land in the figure ‘Plan showing the area proposed for protection from development in Cogg 174 – Cook Field’ in accordance with the recommendations made in this study.

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Local Perceived Value

The value of a landscape is judged on set criteria by landscape professionals in documents such as the Landscape Sensitivity and Capacity Appraisals above. The criteria in such analysis documents are however unable to evaluate the 'local perceived value' of a site.

The Neighbourhood Plan group set out below quotes from the Coggeshall community as evidence that this site has a high 'perceived landscape value' to the local community. **This evidence by inference supports this submission that the western section of Cogg 174 should be retained as local green space as a visually important space and to protect the landscape character and setting of the Essex Way.**

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 **Fiona Stewart** I walk along here regularly with my dog which we both enjoy - I find the openness and views very relaxing after work and my dog just enjoys scampering along sniffing out who had been along before her!

A lot of people use this walk and as you say a dark enclosed walkway would discourage a lot of people, especially in the winter months.

[Like](#) · [Reply](#) · 4 · 22 July at 21:28

 **Sally Purcell** Yes, we use this walk too and I absolutely love it, as does my dog. It would be such a shame to lose this and the view across the field.

[Like](#) · [Reply](#) · 1 · 23 July at 12:03

 Write a reply...    

 **Sharon Brayley** We love this walk. We often do a circular walk here. We take my daughter blackberry picking and the adults collect sloe berries. Fantastic having this walk on our doorstep. It makes you feel that coggeshall is still a rural location.

[Like](#) · [Reply](#) · 1 · 22 July at 21:38

 **Dei Treanor** I regularly walk/run along this path - for me it is the nearest point in the village that feels like open countryside. I love the peace and quiet it offers after a busy day's work

[Like](#) · [Reply](#) · 2 · 22 July at 22:20

 **Teresa Ross-Drummond** We walk our dog along here too; it's a lovely spot...

[Like](#) · [Reply](#) · 2 · 23 July at 08:42 - Edited

 **Sara Bird** I believe this is one of the most popular routes around Coggeshall - a direct, safe and easily accessible path for all into the open countryside. Changing this would have an impact for many. As a frequent lone walker/runner on this route I would instantly be on guard should a high fence be put up rather than the open and visible right of way screening that is used currently. I'm sure plenty of people would feel the same.

[Like](#) · [Reply](#) · 4 · 23 July at 08:41

 **Lynne Akers** I walk her at least 3 times a week its why I choose to live in Coggeshall. Its my medicine. I would be devastated to have this area taken away.

[Like](#) · [Reply](#) · 2 · 23 July at 08:41

 **Jenny Petherbridge** I love this route. It is probably one of the most popular in Coggeshall too and used by many. It is easily visible and leads you into one of the most picturesque parts of Coggeshall. There is a abundance of wildlife in the field where the proposed development will be too. To have the path enclosed and fenced off would be horrible and I'm sure would put lots of people off using it.

Doesn't a public footpath have to meet their intended use and minimise risk of crime and misuse? Surely these factors would be increased if this path was to become narrow and enclosed because of development and would be completely out of keeping with local character of the area.

[Like](#) · [Reply](#) · 3 · 23 July at 07:14

 **Jennifer Thomas** My family walks this route very regularly. My kids enjoy blackberry and elderflower picking in summer and my daughter loves to watch the horses. We often see rabbits and muntjac deer. I run this route on my own at all different times of day without any concerns. This would not be the case if it were a dark, narrow passage with a high fence. We have several such passages in Coggeshall and I avoid them if I'm running alone at certain times of day/night.

[Like](#) · [Reply](#) · 3 · 23 July at 07:28

 **Lynda Barrow** I also run along here regularly, often straight from school drop off in the mornings. There are lots of dog walkers at that time and it could get a bit congested if made narrower!

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Anna Appleton-Claydon It would be good to ensure the path stays open, there should be plenty of landscaping around the borders of the plot, houses shouldn't be built in close proximity to the boundaries and perhaps the design of the houses should even try to incorporate some environmental features.

Like · Reply · 23 July at 08:39

David Evans So where do you access the right of way from East street ?. I know there is a wide gate or was between the Co-op and the first house/bungalow which I dont think is public.

Like · Reply · 1 · 23 July at 08:53

Helen Gore This is a safe off road place to walk dogs and leads down to an open access field owned by us at Pointwell Mill and leads to one of the few places in Coggeshall where people can let their dogs off the lead, safely. It is marked on rambling association maps and is one of the routes respectful ramblers use to come into Coggeshall and spend money locally at tea rooms. We need these footpaths open to support groups of walkers for local commerce.

Like · Reply · 3 · 23 July at 08:18

Ian Stock If ever there was a case in this area for the community being able to purchase land in order to safeguard it, this is surely it... see all the above comments. It would be worth putting more houses elsewhere to compensate. The topography of this site means that almost any development will have a significant impact on the landscape, which is not so everywhere. Just playing a numbers game about "how many" should be built misses the point. That said, if development goes ahead, this is a case where low density would be better, at the road end of the site. Also significant mitigation measures should be required, such as the retention of all mature vegetation, and planting of fairly mature trees, so that the impact of new building is greatly softened.

Like · Reply · 2 · 23 July at 10:18 · Edited

Wendy Jayne Hutchinson I have my horses at the Abbey and as you can see from the photos the next field is the start of the grazing land. Having a housing community right next door will not only cause more traffic flow and exposing the horses directly next to the roads it will also cause for littering and harmful tree and shrub planting if gardens back onto these fields. I wanted to purchase these fields for my horses a while back but was told they would never be sold.

Like · Reply · Yesterday at 10:24

Nicole Lee I am gutted this field would be built on as it has some very old beautiful trees on it I have been looking for local land for sale for grazing for my horse and would have loved to buy this field but as far as I have seen it's never been up for sale? Such a shame 😞

Like · Reply · Yesterday at 11:18

Si Magee This is part of our favourite family walk and is a public footpath.

Like · Reply · 1 · 20 July at 17:41

Alex Stevenson They cannot build on the public footpath, but they could take development to the edge and make the footpath feel really narrow and dark with a close boarded fence as tends to happen a lot.

Like · Reply · 20 July at 19:01

Ian Stock Real shame to lose such lovely fields. This is the creeping effect of development that never shows up in plans, only when it's too late.

Like · Reply · 20 July at 21:34

Sharon Brayley We love this walk too.

Like · Reply · 1 · 21 July at 17:39

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Anna Appleton-Claydon What about natural landscaping around all borders to ensure it doesn't feel closed off but also at the same time something that shields the houses? Perhaps we should ask them to also consider natural materials in the development - even living walls?! Affordable houses, low scale density housing given the allocation and the advert for the field, natural open space within the development, a layout that isn't so formal and maybe also electric charging points for cars given the recent announcements from France and Volvo. Finally (I would love to do this) self build plots to break the site up and introduce variation. This could be an opportunity to make it an incredibly positive development - if it's going to happen, we should accept it and try to shape the development. Will help to avoid getting what we don't want too!

Like · Reply · 1 · 20 July at 19:13

Tara Bacon Yes!! To all this! I love these ideas!

Like · Reply · 20 July at 19:18

Ian Stock Good ideas - my thoughts too - but there are better places. Why is this even necessary when there is a large brownfield site at the Dutch Nursery?

Like · Reply · 20 July at 21:36

Write a reply...

Tara Bacon I think the developers should be required to preserve the walk and something of the views and open feel by the path, don't you all?

It would be horrible to have it boarded up, so it became a dull, characterless rat run down to the walk proper.

They can't shut the path completely, can they?

We've already lost the walk along the river - this path is one of the best used in Coggeshall - it's the only bit of 'countryside' open to us at this end of the village.

Like · Reply · 20 July at 19:16

Anna Appleton-Claydon There should definitely be something about preserving the view! Perhaps this should influence the placement of the houses on the land?

Debbie Morgan Could the triangle section to the west be retained as public open space. Properly landscaped. Perhaps with a small parking area for ramblers and some picnic tables.

Like · Reply · 2 · 21 July at 16:58

Tara Bacon There should be a small walkers' parking area too maybe?

Like · Reply · 21 July at 17:29

Green infrastructure and wildlife corridors.

Reduction in the allocated area of the site would assist in meeting NPPF Guidance and BDC policy LPP 67 Natural Environment and Green Infrastructure to develop a formal, comprehensive network of green infrastructure assets in the Braintree district.

Reduction in the allocated area of the site would also assist Braintree to meet the targets set out in its 2011 Biodiversity Action Plan which aims to improve biodiversity, tackle habitat loss and fragmentation.

The native planting to the East of the Essex Way together with tree and hedgerow planting and open grassland act as valuable corridor for wildlife to reach the recreation ground and the gardens of the houses on the northern side of East Street. Gardens can now offer greater diversity of ecosystems for wildlife and so it is vital that they form part of a network of habitats for our native animals.

The retention of the western edge of the site as local green space would improve the network of green infrastructure assets whilst allowing BDC to allocate part of this site as part of its 5 year land supply.

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Local Green Space Designation.

The BDC Open Spaces Action Plan 2016 notes a deficit in Coggeshall Village of 0.56 Ha of Children's Play and 0.54Ha of Informal Open Space.

The CNP propose the reallocation of this area of the site as Local Green Space. We propose that it be sensitively landscaped to mitigate the visual impact of the adjacent development with native planting to create an informal open space for residents and create a 'pocket wildlife habitat'. This would enhance the start of one of the most attractive local walks around Abbey Mill in Coggeshall and decisively mitigate the negative impacts upon the Landscape Character and rural setting of the Essex Way. It would also decrease the existing deficit in Coggeshall for Informal Open Space.

Conclusion with regard to Cogg 174

The evidence presented above strongly supports the removal of the area indicated on the above 'Plan showing the area proposed for protection from development in Cogg 174 – Cook Field' as allocated residential development. This would protect the landscape character of this rural part of Coggeshall, the identified visual importance of this space, and the landscape setting and amenity of the Essex way. In addition, the evidence also presents a strong case for its reallocation as Local Green Space for the future benefit of the community and as part of the Coggeshall Parish's green infrastructure network.

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Policy LPP 27

Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall

Coggeshall Neighbourhood Plan supports in principle policy LPP 27. **We submit that the following is inserted into this policy.**

'Part of the site is green field. Built development would not be supported in this area.'

The preservation of the existing green field from development would support the creation of informal public recreation space on land which would require minimal reclamation works to support this use. It would provide a green wedge facing onto West Street which would break up the built form along West Street and create a wildlife corridor to the River Blackwater.

Policy LPP 46

Protected Lanes (NB path numbering refers to the path map held by Coggeshall Parish Council)

The CNP group support Policy LPP 46 on Protected lanes. **In addition to those lanes already identified we submit the following lanes for consideration. The historical and landscape justifications are set out below.**

The path between the two mills, Abbey and Pointwell, should be protected on account of its historical significance. Theodoric Pointell, a famous Norman, owned the land there in 1086, and in the 1440s John Dammet, a novice at the Abbey, trudged along this path from his home at Pointell Mill to the Abbey, aged only 13. He had obeyed his parents' wishes that he should become a monk, but several years later wrote a letter to the Pope, stating that he had no real vocation and perhaps should resign. He was promptly promoted! the path follows a very slim and perilous isthmous which separates the mill leat from the back ditch [natural course of the river] and there is a great danger of this slim piece of land being breached by water pressure and poor state of the revetments, the result of such a breach would be that the water from the leat would permanently disappear into the ditch and the whole area would be altered and the footpath would disappear! So, the footpath is very vulnerable.

The mills path is no. 40 on the Rights of Way leaflet, but the number should in fact be 20. At present it lacks signage at its junction with the Essex Way. It's the most beautiful of our footpaths.

Another path that deserves protection is No 23/24, which runs from Palmer's Farm to Colne Road, on the north-east side of the parish. It is one of the few official bridleways, but the southern end is frequently impassable because of the vegetation, mainly thistles. This is also important historically, since it passes by the source of the Roman River, with which Coggeshall has recently been identified through the classical music concerts. The southern end of the path is called Witch Lane, and the northern section passes by Witch Wood, but which of the many Coggeshall witches it refers to is uncertain.

Finally, there is the Little Nunty's area, path no. 10 on the leaflet. The northern section is actually a byway, which means that motor-cycles can use it. There are some great views of Coggeshall along it, and a variety of landscape features. It finally meets the road at Bungate Wood, a short distance from Little Nunty's. Unfortunately lorries sometimes churn up the path at Bungate Wood, and it becomes virtually impassable. This could be another reason for protecting it. And historically this was the famous ancient main road from Coggeshall to Halstead.

7. Creating Better Places

A Healthy and Active District

Protection and provision of open space, sport and recreation

BDC recognize the importance of appropriate levels of provision of open space for sport and recreation within communities. The CNP therefore request an explanation as to why the table below in para 7.23 no longer specifies the quantity of open space required in different development sizes?

7.23 The following table outlines what type and when provision would be required on site.

Type	1-19 dwellings	20-49 dwellings	50-99 dwellings	100+ dwellings	250+ dwellings
Allotments	N	N	N	N	Y
Amenity/Natural Green Space	N	Y	Y	Y	Y
Parks and Sports and Recreation Grounds	N	N	N	N	Y
Play Space (Children)	N	N	Y	Y	Y
Play Space (Youth)	N	N	N	N	Y

Open Space Type of Provision

PP116. Community assets. School playing fields and buildings should be preserved

Policy LPP50 Built and Historic Environment

Just to include "well-designed" into point e after the word quality. CNP is developing a village centre proposal which will be tested at referendum

Houchins Farm (a moated manor house deserving special protection)

This house was originally in the parish of Feering (as also was Surrex), but the boundaries changed in 1893, and it is now in Coggeshall. According to R. J. Brown's 1986 book on "Timber-Framed Buildings of England", the house was built in the second half of the sixteenth century. It doesn't appear in the recent books on Coggeshall's buildings, since those only deal with the village centre. Beaumont doesn't mention it, because his book dates from 1890, before the boundary change. And recent books on Feering don't mention it either, since it's not in their parish any more. So there is little easily accessible material about it.

Brown mentions the house as an unusual example of an oak/elm construction (page 29). He also gives a picture of it, (page 30). It's a great example of a double-jettied house, which makes it special.

Local legend has it that Oliver Cromwell used it as his headquarters during the siege of Colchester in 1648, but this is somewhat suspect, since he was clearly based at Marks Hall, the home of one of his

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generals, General Honywood, and would have had little reason for staying alone in a much smaller property. It did, however, belong to the Honywoods in the eighteenth century, since there is a splendid map in the Essex Record Office by Thomas Skynner, dated 1764. Houchins was part of the estate of the Honorable Lieutenant General Philip Honywood.

The actual name, however, comes from a local family. Nehemiah Lyde, did business with a farmer called William Houchins in the 1690s. I would guess that the Houchins family rented the property from the Honywoods.

The deeds of Houchins from 1770 to 1821 are kept in the ERO, and they show the continued ownership of the Honywoods. In 1847 Houchins was part of the marriage settlement between William Philip Honywood, of Marks Hall, and Frances Phelips of Hertford. In 1919, however, the house was sold off. It's described in the sales catalogue as a "a freehold property comprising manor house with 10 bedrooms, garden, farm buildings and 273 acres, 4 acres of arable land currently used as allotments by Feering Parish Council".

Policy LPP 49 - Broadband

The CNPG supports the need for the Council to work with the telecommunications and broadband industry to maximise access to broadband, wireless hotspots and improved mobile signals for all residents and businesses in rural areas such as Coggeshall. Parts of Coggeshall are not being covered in the current Superfast Essex programme and supporting alternative providers is essential if the village is to have the same level of coverage as the rest of the County.

Policy LPP 55

Layout and Design of Development

The CNP would like to make a comment on trees in developments. Point 9 specified that landscape proposals should include native plant species. The CNP commend this approach but urge BDC to include that new tree planting must also take into account climate change which is leading to longer, dryer periods in this region. Trees species in new developments should reflect this so that we can ensure that new trees can survive and grow to maturity for future generation. For example, in this region it means planting more Oak trees and less Beech. Secondly, new developments must incorporate 'forest scale trees', or trees that combine both a long life with significant height on maturity. Landscape schemes increasingly do not allow enough room for such trees. In the past, where such trees were planted and now bring huge benefits to an area, they are not allowed due to tightened regulations. Short-lived trees reach the end of their life span too quickly and replacement is not easy. In periods of poor economic conditions, replacement tree planting is less likely to happen. Trees, such as Oak trees, have numerous benefits, they do have a long life, they reach a height which rises above 2 storey houses and breaks the urban form, visually softening it and creating a more attractive environment and one which people naturally want to live in. The contribution of such trees to improving the localised air quality, reducing the heat island effect and reducing flooding by uptake of water is also enormous and evidenced in numerous reports. **The CNP submit that this policy be amended to encourage the planting of 'forest scale trees' that will provide aesthetic and health value long into the future.**

8 The Districts Natural Environment

Biodiversity, Landscape Character and Agriculture

Policy LPP 69

Tree Protection

The CNP submit that 1 no. tree, a mature Cedar on the southern boundary of Cogg 174 be awarded TPO status in the BDC Local Plan. This tree is a key landscape feature along the field boundary. As an evergreen tree, its prominence on the skyline is increased in the winter. The Cedar is a key tree in Coggeshall, many feature in the rear gardens of significant listed houses on Church Street. Planted by the Victorians, they represent a period when an interest in new exotic species was rife and are now a key part of the landscape character of this area of Coggeshall.

Policy LPP 70

Protection, Enhancement, Management and Monitoring of Biodiversity

Protection of waterways.

The objectives of the draft local plan are concerned with water quality and damage to the river bed. (Paras 8.16 – 8.20.) These are very important in managing and protecting biodiversity. Of importance, too is the temperature of river water. Temperature rise can have a significant negative impact on biodiversity. **The CNP submit that proposals which would alter the temperature of a river should also be refused, and temperature rises should be quoted alongside pollution and potential damage to the river bed in the BDC text setting out the policies objectives.**

Landscape character.

The CNP, conjunction with the PC, has commissioned a Landscape Sensitivity and Capacity Appraisal in 2017. This follows the same format as the 2015 Evaluation of Landscape Capacity Analysis for Coggeshall. It assesses parcels of land not assessed in the 2015 study. **The CNP submit that this study should be included in para 8.25 along side the 2015 study.**

POLICY LLP 70 Protection , Enhancement , Management and Monitoring of Biodiversity

The Blackwater and Robin's Brook flow through Coggeshall and both rivers support wildlife in the water itself and along the green corridors either side of the water courses. Studies by Essex Wildlife Trust and the EA report rich biodiversity in these valleys. The flows of water vary according to weather conditions and healthy river levels are vital for wildlife, flora and fauna. Climate change is already impacting on the constancy of levels.

We recognise and applaud the measures to protect and enhance biodiversity in the above policy. However, in addition to water quality and riverbed disturbance the impacts of a change of water temperature should also be recognised as having a serious negative impact on biodiversity. Temperature change should be included as a factor when assessing development proposals that would affect waterways.

The BDC Core Strategy 8.1 emphasises the importance of these measures.

The EU Water Framework Directive imposes legal requirements to Improve the water environment.

The Blackwater is under pressure from proposals to extract water. Further water extraction will have a serious negative impact on water quantity and quality and therefore on Bio diversity and the viability of our blue infrastructure networks.

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The CNP submit that the principles underpinning the above policy to protect waterways should be robustly enforced when planning applications are considered. In addition that the impact of temperature change and water extraction on biodiversity in waterways be included in the Braintree District Plan.

POLICY LPP 72 Green Buffers.

The CNP recognise the importance of green buffers to prevent coalescence, protect the identity of communities and provide access, visual and physical, to areas of green space for the health and wellbeing of the communities. In addition, farming land is an important industry to the local economy and necessary to support the food needs of the population. **We therefore submit that, in addition to the green buffers designated in Policy LPP72 between communities, a new green buffer is included to land between Kelvedon / Feering and Coggeshall.**

POLICY LPP 78 Flooding risk and Surface Water Drainage

Coggeshall has a history of flooding . The most extreme event was in 2001 but several lesser events have occurred in the past 50 years. Residents of Coggeshall are very aware of and concerned about the risk of flooding locally . The EA have investigated schemes to alleviate local flooding and a public consultation was held. Local residents strongly supported the schemes. However , none have been implemented for financial reasons. Public concern persists as no measures are being considered further.

A settlement in a river valley has the potential for flooding and the risk is exacerbated by large areas of hard standing and runoff from agricultural fields.

The EA have published a report into the status of Robin's Brook and this reveals that flooding of the village has been to a large extent caused by excess flows down the Brook. It has now been classified as a main river.

The BDC Strategic Flood Risk Assessment identifies issues which might exacerbate flooding and describes measures to avoid increased risk. These issues relate to new developments near and within the flood Plain. CNP trust that the recommendations of the SFRA will be robustly adhered to when applications for development are considered. CNP also submit that local knowledge and information be given due consideration.

The SFRA is classified as a Living Document and CNP trust it will indeed be updated regularly with reference to on-going EA studies of the Blackwater and the potential effects of Climate Change on the rivers

CNP support the retention of 8m wide buffers along main rivers and we would like to add the proposal that trees should be planted here to alleviate flooding. Indeed, tree planting along the river corridors should be actively encouraged.

POLICY LPP79 Surface Water Management Plan

Localised flooding has been exacerbated by the antiquated and inadequate drainage and sewerage systems in Coggeshall.

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One of the major constraints on development in Coggeshall is that most of the town has a combined sewer for both foul and surface water drainage. Heavy rainfall therefore causes extensive run-off into the sewer system, and the ensuing flooding then consists of foul and surface water. This is obviously a serious hazard to health. The sewer tunnels are thought to be of 15 inches diameter even at their widest – and they currently struggle with the volume of surface water and waste that is discharged through them. Any development on the west side of Coggeshall is particularly difficult because the only available drainage for surface water (which is currently absorbed by the fields) is Robinsbook, leading to Back Ditch, and this floods.

This information is based on knowledge gained from Anglian Water.

CNP submit that any new development considered for Coggeshall should be considered in the light of this information.

Conclusion

We trust that BDC will consider fully and without prejudice the comments and objections submitted in this report. The comments made by the CNP are based upon community consultation and research undertaken by the Steering group. The CNP endeavor to represent the community of the Parish of Coggeshall and as such we are striving to conserve and enhance our Parish whilst enabling development in a positive manner.

A handwritten signature in black ink, appearing to read 'Peter Kohn', is positioned on the page.

For and on behalf of the Coggeshall Neighbourhood Plan Committee,
Peter Kohn, Chair CNP