

Kelvedon Parish Council

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Planning Policy
Braintree District Council
Causeway House
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CM7 9HB

30 September 2019

Dear Sirs

Braintree Local Plan Technical Section 1 Consultation Response

Thank you for consulting Kelvedon Parish Council. Set out below is the formal consultation response from Kelvedon Parish Council.

Section 1 – Process

Kelvedon Parish Council strongly believe that following the request for further evidence by the Planning Inspector, BDC should have chosen Option 1, by proceeding with Section 2 of the draft Local Plan and returning to the issue of Garden Communities once this had been completed and adopted. The significant and on-going delays which have been experienced in bringing this Local Plan to conclusion have left communities within Braintree District exposed, and open to speculative development. This consultation continues to clearly demonstrate that the technical evidence is not in place to support the Garden Communities which are highly complex and rely on strategic infrastructure such as the A120 improvements and Rapid Transit initiatives that currently have no certainty of delivery.

Turning specifically to the Rapid Transit System (RTS), the Parish Council have concerns that these proposals are still uncertain and vague. The report is full of concepts rather than proposals and by its own admission states that further detailed work is required. There is no certainty that the off-line route options are deliverable, and the danger is that without further more detailed work, the default position will be buses which is not the step-change that will be required for the scale of development proposed.

This is particularly relevant as the Garden Communities are strategic developments with long lead-in times which only contribute towards housing supply at the end of the Plan period with the vast majority post 2033. In this time BDC will need to have reviewed the Local Plan **four times** (every 5 years).



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Within the Parish of Kelvedon, 291 dwellings were proposed under Section 2 of the draft Local Plan. To date, 250 of these have been approved at outline and are currently being considered under both REM and FUL applications. The remaining 41 of this allocation are expected to be coming forward shortly. In the meantime, another 35 dwellings have been approved at outline, and a further 375 are currently under consideration at BDC.

Proceeding with Option 1 would have had the effect of bringing the Local Plan to adoption a lot quicker than will happen now and would protect BDC against further speculative development. As it currently stands, with BDC proceeding with Option 2, this bombardment of large developments occurring in our District's villages will continue, with no defence being offered by BDC, lest a refusal is taken to appeal and won. A small number of exceptions do exist to this, but these are only occurring in areas where there is proximity to either AONB, Listed and historic buildings or country parks. However, most sites in and around our villages do not have such protections. We suggest that the view taken suggesting that proceeding with Option 2 will in fact protect the villages is somewhat of a myopic view, given the time-scales involved.

As it stands, the number of dwellings approved by BDC, and the sites which have been put forward in the emerging Plan during this period of uncertainty between an out of date Plan and a new Plan, must almost certainly be heading towards a situation where the new Local Plan will be a document where the horse has already bolted. The site proposed for Kelvedon (Land West of Kelvedon Station) has outline permission and is in the later stages of a detailed application. However, the alternative site considered for the draft Local Plan, which was dismissed by BDC Full Council, is now well on the way to obtaining outline permission, as well as two other speculative sites in the village. This takes the potential number of new dwellings within the village to almost 700 and there is potential for this to increase as further sites are put forward.

It is hard to envisage that BDC will be able to refuse these proposed sites, given the out of date Plan, resulting in deferment to the NPPF and the presumption in favour of sustainable development. There are a number of examples where the BDC Planning Committee has agreed speculative development even though the Committee were not in favour of a particular site, they had no choice but to approve it as BDC would have no defence at appeal, the Parish Council are in no doubt that the village will end up with all of these new dwellings approved.

The potential number of the new dwellings facing Kelvedon has not been taken into account, when looking at the numbers of residents using the roads, rail and services in the village, under this consultation. With almost 700 new dwellings, we are already looking at an increase of somewhere between 1,500 and 2,000 residents, before the impact of any garden community is calculated. These numbers, and the increases in population from development in surrounding villages need to be factored in. This is, in our opinion, a serious flaw in the outcomes from the technical documents.

It is Kelvedon Parish Council's position that BDC's priority should be to adopt an up-to-date Plan as quickly as possible which allocates deliverable sites for the next 5-10 years allowing further detailed work to continue on the location and deliverability of the strategic sites.



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The current approach of BDC directly conflicts with its own objectives as it is leading to:

- Speculative development, much of which has not been proposed for inclusion in the Local Plan, being approved across the district in an unplanned and uncoordinated manner;
- The potential for the garden communities to be in the wrong locations, have questionable deliverability and will not be supported by strategic infrastructure, which will lead to unsustainable development and poor environments for future residents.

Therefore, for the reasons set out above Kelvedon Parish Council wishes to submit its OBJECTION to Section 1 in its entirety, and as such, its objection to the Technical Section 1 documents contained within this consultation.

Site VE1 Land at Kelvedon (Kings Dene)

Although Site VE1 is not being taken forward under the draft Section 1, it is very much noted that the outcome of the Additional Sustainability Appraisal concluded that: *'The overall performance of the alternative strategic sites against the SA objectives found that the difference between them was not that great. There were no sites that performed extremely well against all the criteria and no sites that performed extremely poorly. No 'showstoppers' were found at this stage of assessment, which meant that it was concluded that no individual sites could be ruled out on the basis of the SA alone'*.

This presents the opportunity for the promoters of alternative sites which were not taken forward by BDC to challenge the options set out in Section 1, at Examination. Therefore, Kelvedon Parish Council wish to submit the following points with regard to the potential site, VE1 – Kings Dene, Kelvedon.

As outlined earlier, Kelvedon is subject to a huge amount of development over the next few years, and the addition of a large development/garden community effectively swamping the current village, up to its boundary, will result in the loss of Kelvedon as a village and significantly changing its setting and character. The Additional Sustainability Appraisal outlines the following negative impacts on Kelvedon:

- It will pose a significant threat to landscape (at all scales), due to the significant change which would occur to the strong and highly sensitive landscape character of LCA Blackwater River Valley, and to the nearby Local Nature Reserve.
- As a large site, the delivery of this at any of the capacity scales is likely to significantly impact on the existing community in the area, with major changes to the character of the area, particularly the landscape context.
- Development of this site is likely to affect a number of other sensitive receptors which are present either within the site or very near to it. While there are relatively few sensitive biodiversity assets in the surrounding area, effects are anticipated on heritage assets in Kelvedon, very good quality agricultural land and mineral resources.
- The development of this site is likely to significantly change the character of Kelvedon and Feering.
- Potential impacts on the setting of nearby heritage assets and conservation area in Kelvedon.



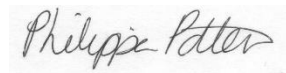
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- Community cohesion - due to the potential impact of large-scale development on the existing community within and surrounding the site.

The Kelvedon Neighbourhood Plan is making good progress with a Regulation 14 consultation completed with a final Draft Plan scheduled for completion in early 2020. The proposed development at Site VE1 would fundamentally conflict with the emerging objectives and policies of Neighbourhood Plan.

Therefore, for the reasons set out above Kelvedon Parish Council wishes to submit its OBJECTION to the proposals at Site VE1 Land at Kelvedon. The Parish Council also wishes to request to speak at the Examination.

Yours sincerely



Philippa Potter
Clerk to Kelvedon Parish Council



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