

Copford with Easthorpe Parish Council

Chairman of the Council: Councillor Graham Barney

Clerk to the Council: Kate Palmer

Parish Office: Teranmor, Colchester Road, Wix, Manningtree, Essex, CO11 2RT

Phone: 07939 597176

Email: copfordwitheasthorpepc@gmail.com

www.copfordwitheasthorpeparishcouncil.co.uk

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Dear Mr Bridgewater and Ms Jordan

Objection to the sites allocated: STN 18 Hall Road and STN 26 East Queensberry

When these sites were allocated to Copford with Easthorpe there was immediate concern expressed about their suitability. Neither had a 'green' rating when they were considered under the SLA in 2015/16, in common with the majority of other sites within the Parish boundary they received 'amber' rating with significant high level constraints identified in SS5

The constraints remain in place, around health facilities and water/waste water supply.

There has been no improvement in health provision.

In a letter dated December 2018 The Environment Agency identified that 'Copford WRC is currently operating over the works capacity' This has not changed, but if anything worsened with tankered sewage to Copford WRC on a daily basis.

Further issues were raised at the Local Plan Committee Meeting 19/12/16 relating to the School capacity, access and egress to and from each development on to local roads and London Road.' Adequate protection of relevant site constraints' is mentioned but there is no evidence of this, or of any 'safeguard existing residential amenity'

All these issues remain unanswered and unresolved.

The allocation of 120 homes on the two sites is arguably disproportionate to the size of the existing Parish as it will result in an 18% increase in housing, this does not however include other developments outside the Local Plan such as Copford Place, Adcocks and Foundry Lane which together would contribute well over 35 stand alone homes and 30+ dwellings within one building. This would make the total allocation an increase in excess of 22%

Copford with Easthorpe is deemed 'sustainable' as it has a Primary School (over subscribed) a pub and churches plus a Village Hall. It does not have any easy access Health Facilities, nor shops and post office and the local bus service although three times an hour maximum at peak does not serve any outlying areas beyond the B1408. The proximity of the A12, A120 and mainline rail station makes the area attractive to commuters but does not enhance the facilities available for those residents who do not commute but either work locally, from home or are retired.

The Parish Council and residents are not against building new homes in the Parish area and recognise that they will be needed over the period of the Local Plan but do not support the

two sites allocated by Colchester Borough Council. Neither of these sites have the support of the Parish Council and the vast majority of residents of the Parish as shown in the Neighbourhood Plan surveys 2016 and 2019.

To deal with the specifics of each site: for convenience and help identifying the points made MM refers to Main Matters referred to in the Issues and Questions for the examination

Site STN 18 Hall Road: land allocated for 50 homes

This is shown in Colchester Borough Councils' documentation as a 'protected lane' It was also the subject of a recent Outline Planning Application by the landowner which was withdrawn on the advice of officers to the Chair of the Planning Committee when it became obvious that should it have gone to a vote it would have been rejected. The reasons for opposition to this site by 128 objectors when the OPP are clear in the documentation which CBC will doubtless have provided.

Key objections to development of this site are the following:

MM2 there does not seem to have been sufficient use of local evidence-such as the information from the Neighbourhood Plan surveys (2016 and 2019) and RCCE Housing Needs Survey (June 2020 available on the Parish Council website) to address the needs for all types of housing and necessary infrastructure. Neither has there been sufficient engagement with the Parish Council about local housing needs.

MM3 the proximity of this site to Local Wild Life sites-Keepers Wood and Pits Wood-needs to be given more importance as both these areas and the Hall Road site form part of important green corridor for wildlife.

MM11 No evidence is provided as to how this site will contribute to promoting health and well-being. It should be noted that in addition to the 128 objections made when OPP was applied for, the number of homes applied for on site was 49. This could be considered somewhat cynical as we understand it is one house below the number required for any contribution to any NHS infrastructure which was highlighted as a key constraint and remains one.

MM12, MM16, MM17: there has not been sufficient consideration to the Grade 2 listed building –Brewers Cottage-which is alongside this proposed site, neither in terms of the private view nor of the public view from the house across the field-scape and to/from the curtilage.

MM14: regarding Housing Density is not adequately addressed in this site which would have a much higher density with 50 homes than other areas of the Parish.

MM18: Given the width of the road, the number of homes allocated should not exceed 25 according to the Urban Design Consultation report dated 24/06/20 and submitted to Colchester Borough Council.

Access-it is not possible to get two vehicles passing and have pedestrians/buggy/wheelchair access. It was pointed out by disabled Councillors at the recent OPP meeting of Colchester

Borough Council that the width of the proposed 'run over walkway' did not meet relevant disabled access legislation. The minimum 1.542 m width to accommodate wheelchairs users cannot be met from the existing available land. This has not changed.

'Parking domination in conflict with the Essex Design guide' was a further comment from the Urban Design Consultation 24/06/20

Access/egress for children School has not been addressed-nor school places.

Additional traffic flow onto the B1408 from this site does not encourage 'Promoting Sustainable Transport and Changing Travel Behaviour.' Given that 50 homes were developed on this site this would be a minimum of 100 additional car journeys per day. This would also seem at odds with Colchester Borough Councils declared 'climate emergency' when this additional vehicle movement would add a significant amount of carbon dioxide and nitrous oxides to the B1408 which is already considered to have one of the poorest air qualities in the Borough.

MM19 Sewage and water- both have been referred to earlier as high level constraints and remain so, Anglian Water are being requested to provide by residents information as an EIR request about this matter.

Despite suggestions that this site is 'flood free' recent evidence contradicts this as one corner of the site is frequently flooded and the SUDS provision suggested in the OPP of 'sunken crates' does not seem adequate to deal with this.

Site STN 26 East Queensberry-land behind Dorothy Curtice Court allocated 70 homes

This site was the subject of a much earlier suggestion for building a retirement village of a large number of homes with pond, play area and community facilities which would have had access from the B1408 (London Road) and egress via Queensberry Avenue, there was much local opposition to this and also from Highways and officers as the access/egress would have provided a race track and caused significant traffic and safety problems particularly in Queensberry Avenue.

The allocation of 70 homes here is not compatible with what the owner Anchor/Hanover has told the Parish Council at a public Council meeting. Their ideas were to have 10 flexi-dwellings, 26 stand alone including affordable homes and between 80 and 130 assisted living places due to high 'local demand'

These numbers are significantly higher than the allocation and are not in line with the RCCE Housing Needs Survey (June 2020) there is not a demand for 70 assisted living places locally let alone 126-166.

A recent objection letter signed by residents and sent to the Information Officer on April 6th showed 126 residents representing 73% of all homes in this area objected to the allocation of this site.

MM2: As stated above, the suggestion of between 70 (allocated) and 120-166 possible homes on this site is not in keeping with the RCCE HNS information which does not require locally that number of this type of homes-Hanover/Anchor characterise them as 'assisted living' in the main aimed at people 55+. This then does not meet the local context.

MM3: The land under consideration is mainly low grade agricultural land, however it is bordered by mature trees and part of the ecologically sensitive Roman River, in addition it forms part of a green corridor between heavily wooded land at the rear of the Queensberry development and the A12 with frequent sightings of deer, bats, fox and badgers not to mention a variety of bird species.

MM11: The significant increase in a more elderly population from additional assisted living dwellings is not supported by any increase in health provision.

MM18: The road width in Queensberry Avenue is 5.5 metres which as a type 3 Road following Essex Design Guide (information provided by Paul Wilkinson of CBC in July 2016) defines Queensberry Avenue as a feeder road onto London Road with a maximum capacity to serve 200 dwellings. Given this the maximum number of additional homes which might be accommodated following this guide would be no more than 44.

Increased traffic flow –of between 140 and 332 vehicle journeys per day would place a significant extra load on the type 3 Queensberry Avenue which already has access problems due to parked vehicles.

The increased traffic could only flow onto B1408 the already heavily used and congested London Road, which as mentioned earlier already has poor air quality which would be worsened. Similarly it will contribute additional carbon and nitrous oxides to the air, at odds with Colchester Borough Councils declared climate emergency.

There would also be an impact on the safe passage of pedestrians especially children who use Queensberry Avenue and the PROW to London Road as safe access routes to and from School. As proposed the access road to this site would cross the PROW adding to risk.

This additional allocation of between 70 and 166 dwellings, as with Hall Road will not be in keeping with any promotion of sustainable travel, nor will it change travel behaviour.

MM19: The SLA for this site identifies issues with this site due to water and sewage (Anglian Water identifies this) giving it a red RAG rating. The fact that provision may have to cross the environmentally sensitive Roman river adds to concerns, cost and time scale. It has already been mentioned that Copford WRC cannot meet existing demand. Due to its proximity to the Roman River the site does have some flooding issues

In conclusion another significant change since the allocation of the two sites is that one site; originally left out of the Call for Sites process is now available. The Car Boot Sale Field on London Road was not considered as it was the subjects of speculation about and draft plans for a potential A12 re-routing. Since the demise of the so called ‘West Tey’ garden village, this site is now available and being actively promoted by the land owner with the support of local residents-this site was the highest scoring of any site in the Copford with Easthorpe Neighbourhood Plan survey in 2019.

The allocation of the two sites in Hall Road and Queensberry are both on an east/west access and if approved will add significantly to the matters raised by the Parish Council and residents in their objections to this proposal.

Yours sincerely



Graham Barney

Chair, Copford with Easthorpe Parish Council