

Response to Braintree District Council
Local Plan Review 2041 Preferred Options Consultation
(Regulation 18)

Messing cum Inworth Parish Council (McIPC) submits this formal representation on Policies LPR25 SGL and LPR26 SGL in Braintree District Council's Local Plan Review 2041 Preferred Options Consultation.

McIPC also submits formal representation on the following Evidence Base and Supporting Documents:

- The Sustainability Appraisal, Chapter 7 and Objectives 1, 3, 4, 9 and 10
- The SA and HRA Regulation 18 – Expected Amendments Document

McIPC strongly object to the Local Plan review as it has been based on an inaccurate Sustainability Appraisal. The addition of almost 7,000 new homes around the villages of Kelvedon and Feering is completely unsustainable for numerous reasons. The Sustainability Appraisal works on the assumption that because Kelvedon has two access points to the A12 it therefore has good transport links.

This is NOT the case. Both access points are restricted junctions – The southern access point only provides access to and from the southwest; the northern access point only provides access to and from the northeast. This results in traffic having to pass through the narrow historic village centre of Kelvedon to access the A12. The Draft Local Plan was originally written on the assumption that the A12 widening and improvement works would be completed, with a new southern interchange to the south of the allocated site "Land at South East Feering" (Policy LPR25 SGL) and an improved interchange to the southwest of Kelvedon next to the proposed Kings Dene site (Policy LPR26 SGL). The A12 improvement works were cancelled in Summer 2025. Since the Draft Local Plan went out to consultation, the Government's Road Infrastructure Strategy 3 has been published, and neither the A12 nor the A120 are included for major investment. Without these road improvements both sites are completely unviable.

McIPC notes that 18,959 new homes are proposed in Braintree District Council during the next 15 years. Whilst the "Main Settlements" (as identified in the Draft Local Plan as the towns of Braintree, Witham and Halstead) are proposed to accommodate a significant proportion of these, the villages of Kelvedon & Feering are expected to accommodate over one-third of these new homes.

There is also a significant imbalance in proposals between the settlements. The market town of Halstead already has a Secondary School. The entire Draft Local Plan identifies only one site for new educational facilities. This is at Halstead where 2,850 new homes are proposed, along with a new bypass. In contrast, almost 7,000 new homes are proposed (and some are already allocated) around Kelvedon and Feering. However, there are no infrastructure proposals or allocations to support the new residents. Secondary school children will need to attend the already oversubscribed secondary schools in surrounding towns and villages. This is assuming that the children are not stuck on buses in the grid-locked Kelvedon High Street.

It has strong concerns as follows:

Policy LPR25 SGL – Land at South East Feering

This site is allocated in the current Local Plan. In the preferred Options Document Paragraph 4.95 states “[Appropriate access to the A12 is a requirement of this strategic growth location](#)”. However, the designs submitted in the current outline planning application for this site do not provide appropriate access to the A12. Any traffic travelling to or from the south will need to pass through the narrow, historic village centre of Kelvedon. The High Street is already subject to long queues. With the additional housing at Feering this is likely to create queues backing up onto the A12.

On the boundary of the development is a narrow historic bridge known as “Hinds Bridge”. Within the submitted planning application documents there is no mention to upgrade or improve this bridge. In 2018 the bridge was closed for several weeks for emergency works due to structural issues. This resulted in very long detours for local residents and businesses. If development of this scale is to be permitted, there should be a requirement for the developer to upgrade and widen this bridge.

Policy LPR26 SGL – Kings Dene – North, West and South West of Kelvedon

Paragraph 4.97 states “[a new road to connect to the A12 to relieve existing congestion on Kelvedon High Street](#)”. However, the proposal does not acknowledge that although Kelvedon / Feering has the benefit of two A12 junctions, these both have restricted access meaning that any traffic travelling to and from the north-east of Kelvedon will need to travel through the narrow and already congested village High Street. KINGS DENE IS NOT A SITE FOR SUSTAINABLE TRAVEL DUE TO THE LACK OF INFRASTRUCTURE.

Paragraph 6.174 of the Sustainability Appraisal acknowledges the lack of nearby Secondary Schools to the site. Only developer contributions are proposed for Primary and Secondary Schools. As discussed above, this is an example of very poor planning at its worst. Sites for

Schools and Health facilities should be allocated within such large proposed developments to ensure that schools and all necessary facilities are actually built ahead of the new homes being occupied. Paragraph 6.176 of the Sustainability Appraisal states “The allocation is close to or contains biodiversity and heritage assets, such as an area of ancient woodland and Kelvedon Conservation Area and several listed buildings and it is likely to prove difficult to fully mitigate the effects in relation to these assets” This very large proposed allocation will cause significant harm to the natural and historic features of the village and surrounding countryside, added to which it does not have the infrastructure to sustainability support it. Increased light pollution will negatively affect nocturnal wildlife. Development of this scale is likely to result in a significant adverse impact on Essex coastal habitats due to the draw of the coast for recreation and dog walking.

Chapter 7 of the Sustainability Appraisal – Cumulative Effects

This chapter, paragraphs 7.1 – 7.3, appears incomplete and lacking in information. The cumulative effects of the proposals in this draft Local Plan and those of the neighbouring local authorities MUST be analysed fully before any emerging Local Plans are adopted. Without this data, it is impossible to accurately assess the cumulative demands on infrastructure such as roads, public transport, schools, medical and shopping facilities.

SA objective 1: Create safe environments which help to address deprivation, improve quality of life and community cohesion

Paragraph 7.4 of the Sustainability Appraisal states “The Local Plan, particularly through the spatial strategy (Policy LPR 1 Spatial Strategy for Braintree District), focuses development within or adjoining settlements in accordance with their scale. As such much of growth over the plan period will be provided within or as extensions to the larger settlements of Braintree town, Halstead and Witham, as well as the A120/A12/Great Eastern Mainline corridor (including towards the service villages of Hatfield Peverel and Kelvedon. By focussing the majority of development towards settlements with the widest range of services and facilities and areas where there is good access by public transport to services and facilities further afield, the plan is likely to support community cohesion and integration. These larger settlements are also likely to be those at which community networks can support large increases in population without more substantial adverse impacts. The scale of growth set out at the strategic growth locations identified through Policy LPR 18 Housing Provision and Delivery and the relevant site allocation policies could result in some overburdening of existing services and facilities in the settlements they are to act as extensions to. Notably Braintree town will accommodate 6,600 new homes as urban extensions and sizeable extensions are also set out in the service villages of Kelvedon and Hatfield Peverel.”. Kelvedon does not have a wide range of services and facilities. “Some overburdening of existing facilities” is an understatement of the effect that will be caused by almost 7,000 new homes being bolted

onto a rural village! The draft Local Plan has been based on an understated and inaccurate Sustainability Appraisal.

SA objective 3: Improve health and wellbeing and reduce health inequalities

Paragraph 7.11 of the Sustainability Appraisal states: “...However, development near some areas will experience noise pollution. One example is Kelvedon as the A12 road is in close proximity to proposed development, as well as certain sites in Braintree that are near the A120 and A131, both of which will experience negative effects on health in terms of noise levels”. This is yet another reason why sites LPR25 and LPR26 are not sustainable locations. Allocating residential developments of this scale in areas where it is known and accepted that the health of residents will be negatively impacted is completely unacceptable. The draft Local Plan should be dismissed on just this fact alone. The plans do not include provision of NHS dental facilities and current facilities are already over subscribed and not accepting any new adult patients. Failure to provide adequate NHS medical facilities will not improve residents health and well-being.

SA objective 4: Promote the vitality and viability of services and facilities and centres throughout the district

Paragraph 7.14 of the Sustainability Appraisal states: “Local Plan Policy LPR 1 Spatial Strategy for Braintree District aims to direct most development to the main settlements of Braintree town, Witham, Halstead and Kelvedon through the SGLs. These areas are already well related to public transport and active travel links and have good access to existing services, such as local schools, primary healthcare facilities and community facilities, as well as open space”. This differs to the “Main Settlements” identified in paragraph 3.9 of the Draft Local Plan. Kelvedon is NOT a main settlement. Kelvedon and Feering do not have a secondary school, it has no significant Open Space, an overstretched GP and no supermarket. It does not have active travel links. The railway carpark is already full and the A12 has restricted access junctions.

SA objective 9: Conserve and enhance the historic environment, heritage assets and their settings

Paragraph 7.29 of the Sustainability Appraisal states: “Policy LPR 1 Spatial Strategy for Braintree District focuses development around these areas including Braintree town, Witham and Halstead and are likely to affect those heritage assets which development is in close proximity to. Negative effects are therefore likely on the setting of these assets or the assets themselves. However, several of the districts’ heritage assets are also located in rural areas and so are likely to avoid the impacts from the majority of development”. There is no acknowledgement that Kelvedon and Feering have a high density of historic and listed buildings. Those located on Kelvedon High Street are likely to be severely impacted by the huge growth in traffic that will need to pass through the village to access the A12 (restricted) junctions.

SA objective 10: Reduce contributions to climate change

Paragraph 7.33 of the Sustainability Appraisal states: “Policy LPR1 Spatial Strategy for Braintree District directs much of the development over the plan period to the urban areas of Braintree town, Witham, Halstead and Kelvedon. The urban areas benefit from widest range of services and facilities in the plan area and development at these locations is likely to encourage travel by more active and sustainable modes”. Kelvedon is NOT an urban area. It is a village surrounded by beautiful countryside and fertile agricultural land that will be lost to development. As discussed above, the village does not have active travel modes. It does not have wide services and facilities. With the absence of any allocation for secondary schools and medical facilities in sites LPR25 and LPR26, new residents will be forced to travel outside of the settlement, adding to the already huge congestion that will increase exponentially with the accumulative effect of the other developments proposed for the area.

The “SA and HRA Regulation 18 – Expected Amendments Document” -

Page 73/ para 4.9 amendment states “Many planned projects within (para) 4.9 are a Local Plan aspiration which do not have a pathway for funding. E.g. A120 to A12, A12 active travel, Branch loop”. A Local Plan CAN NOT and SHOULD NOT be drafted based on aspirational infrastructure. If infrastructure is lacking, then development should not be allocated without its provision. The Draft Local Plan also provides no explanation as to how the proposed developments will be serviced by water, electricity and sewage. These are the basic requirements for any development proposals, but they have not been addressed in the draft Local Plan.

Where is the evidence that there is an identified need for such large scale development in Kelvedon? Development should be in response to identified local needs.