

# Consultee Comments for Planning Application 17/02246/OUT

## Application Summary

Application Number: 17/02246/OUT

Address: Land North Of Colchester Road Coggeshall Essex

Proposal: Outline application for the construction of up to 335 dwellings (including up to 40% affordable) without a Class C2 care home or up to 318 dwellings with a Class C2 care home (up to 80 beds); nursery/community facilities (420m<sup>2</sup>) and provision of access, roads, drainage infrastructure, open space and strategic landscaping. Demolition of existing garage/ workshop building.

Case Officer: Mr Timothy Havers

## Consultee Details

Name: - Coggeshall Parish Council

Address: 25 Stoneham Street, Coggeshall, Essex CO6 1UH

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On Behalf Of: Coggeshall Parish Council

## Comments

Coggeshall Parish Council objects to the revised planning application.

Parish Councils objection to original application

The revised proposal does not remove any of the grounds for objection contained in the Councils objection to the original application dated 5th February 2018. The reduction in the number of homes of only just over 10% compared to the number in the original proposal (absent the Care Home) does not materially alter the scale or nature of the development. The Parish Council therefore reiterates its original objection.

Removal of Care Home from proposal

The removal of the proposed Care Home in the revised application is highly significant. In the original application the Care Home was central to the benefits that would allegedly arise from the development, both for the accommodation it would provide and the large numbers of jobs that it would create. Its abandonment therefore removes a central plank of the justification for the development.

There is an increase in the proportion of affordable homes in the revised application. It seems to the Parish Council that this increase may be an attempt to sweeten the proposal to compensate for the removal of the Care Home. However this is only an outline application, so the proportion of affordable homes could go back down again. Moreover affordable housing is not a panacea for all ills: it is the development as a whole that is objectionable, whatever its composition.

## Objection by Neighbourhood Plan Group

The Parish Council fully endorses the objections contained in the letter dated 14th August from the Chair of the Coggeshall Neighbourhood Plan Group in his letter dated 14th August.

## Revised Archaeological and Heritage Assessment (AHA)

The Parish Council strongly disagrees with the applicants contention that the Coggeshall Conservation Area, a designated heritage asset under the NPPF, will not be adversely affected by the development (paragraphs 6.3 & 6.4). The Council considers that the development will cause substantial harm to the Conservation Area.

## Paragraph 4.19 of the AHA states

There is currently no publicly available conservation area appraisal or similar document, which would identify the character and appearance of this designated asset. In the absence of this information, it is assumed that the designation is intended to control development within the former post-medieval extent of the village

Even if it were correct that there was no such document, the assumption that the AHA makes would be unwarranted. The Conservation Area is far more than a collection of listed buildings, and takes in far more than the post-medieval village it extends to include the fields and the spaces in between the Cistercian Abbey, the fishponds, the Mill House, the 15th century church, 13th century bridge, Paycockes, the breweries and Maltings so that it captures the site of the early settlement on the Roman road, records the position of the religious settlement in relation to the town centre and the River Blackwater and encompasses the early focal point of development around the church and the later focal point of development to the west. Even without any conservation document, it is obvious from a cursory look at the Conservation Area on a map that it is to be viewed as a whole, as a record of the communitys development over more than 900 years.

In any case there is a publicly available document, namely "Historic Towns in Essex Coggeshall Historic Towns Assessment Report 1999" published by Essex County Council. Though not an appraisal of the Conservation Area per se, the report makes it clear that as well as the concentration of listed buildings making the centre of Coggeshall a heritage site of great significance, Coggeshall as a whole is a place of considerable archaeological and historical importance, as an example of a small market town.

As the AHAs assumption about the purpose of the designation of the Conservation Area is mistaken, the conclusions it draws are likewise mistaken. Once it is recognised that the Conservation Area must be regarded as a whole to be protected (hence its designation), the substantial harm that the development will do to it becomes clear. A clear instance of this is the considerable increase in traffic through the centre of the village that would undoubtedly result, and the effect this would have on the fragile, timber-framed buildings that in many cases open directly onto the street.

A vital issue for designated heritage assets under the NPPF is their setting. The APAs approach to this is also mistaken, because it looks in minute detail at individual elements of the Conservation Area in isolation (see Section 5) instead of looking at the Conservation Area and its setting as a whole. The proposed site is part of the green buffer that surrounds Coggeshall, and its loss through such a large development would fundamentally change the rural character of the village. (It is acknowledged that there has been considerable development on the north side of Coggeshall. However most of it pre-dates the designation of the Conservation Area in 1968.) This in our view constitutes substantial harm to the designated heritage asset that is the Conservation Area.

In conclusion, the Parish Council considers that the development would do substantial and irreparable harm to the unique designated heritage asset that is the Coggeshall Conservation Area, and that on the principles contained in the NPPF planning permission should be refused.