

LOCAL PLAN SUB-COMMITTEE AGENDA

Thursday 30th March 2023 at 6.00pm

**Council Chamber, Braintree District Council, Causeway House, Bocking
End, Braintree, CM7 9HB**

THIS MEETING IS OPEN TO THE PUBLIC

Members of the public will be able to view and listen to this meeting via YouTube
To access the meeting please use the link below:

www.braintree.gov.uk/youtube

**Members of the Local Plan Sub-Committee are requested to attend this meeting to
transact the business set out in the Agenda.**

Membership:-

Councillor J Abbott	Councillor Mrs I Parker
Councillor K Bowers	Councillor Mrs W Scattergood (Vice Chairman)
Councillor G Butland	Councillor Mrs G Spray (Chairman)
Councillor J Coleridge	Councillor P Thorogood
Councillor T Cunningham	Councillor J Wrench
Councillor T Everard	Vacancy

Apologies: Members unable to attend the meeting are requested to forward their
apologies for absence to the Governance and Members Team on 01376
552525 or email governance@braintree.gov.uk by 3pm on the day of the
meeting.

D GASCOYNE
Chief Executive

INFORMATION FOR MEMBERS - DECLARATIONS OF INTERESTS

Declarations of Disclosable Pecuniary Interest (DPI), Other Pecuniary Interest (OPI) or Non- Pecuniary Interest (NPI)

Any member with a DPI, OPI or NPI must declare the nature of their interest in accordance with the Code of Conduct. Members must not participate in any discussion of the matter in which they have declared a DPI or OPI or participate in any vote, or further vote, taken on the matter at the meeting. In addition, the Member must withdraw from the Chamber where the meeting considering the business is being held unless the Member has received a dispensation from the Monitoring Officer.

Public Question Time – Registration to Speak on an Agenda Item:

The Agenda allows for a period of up to 30 minutes for Public Question Time. Members of the public may ask questions or make statements to the Sub-Committee on matters listed on the Agenda for this meeting.

All questions or statements should be concise and should be able to be heard within the 3 minutes allotted to each speaker.

Anyone wishing to ask a question or make a statement is requested to register their interest by completing the Public Question Time registration **online form** by **midday on the second working day** before the day of the Committee meeting.

For example, if the Sub-Committee Meeting is on a Tuesday, the registration deadline is midday on Friday, (where there is a Bank Holiday Monday you will need to register by midday on the previous Thursday). The Council reserves the right to decline any requests to register to speak if they are received after this time.

When registering for Public Question Time please indicate whether you wish to attend the Sub-Committee meeting 'in person' or to participate remotely. People who choose to join the meeting remotely will be provided with the relevant link and joining instructions for the meeting.

Please note that completion of the online form does not guarantee you a place to speak during Public Question Time. You will receive email notification from the Governance Service confirming whether your request is successful.

The Chairman of the Sub-Committee has discretion to extend the time allocated to registered speakers and the order in which they may speak.

In the event that a registered speaker is unable to connect to the meeting, or if there are any technical issues, their question/statement will be read by a Council Officer.

Further information on Public Question Time is available on the Council's website.

Health and Safety/Covid: Visitors are asked to make themselves aware of the nearest available fire exit. In the event of an alarm sounding visitors must evacuate the building immediately and follow all instructions provided by staff. Visitors will be directed to the nearest designated assembly point where they should stay until they are advised that it is safe to return to the building.

Mobile Phones: Please ensure that your mobile phone is switched to silent during the meeting in order to prevent disturbances.

WiFi: Public Wi-Fi (called BDC Visitor) is available in the Council Chamber at Causeway House; users are required to register when connecting.

Documents: Agendas, Reports and Minutes can be accessed via www.braintree.gov.uk

Data Processing: For further information on how the Council processes data, please see the Council's Privacy Policy:
https://www.braintree.gov.uk/info/200136/access_to_information/376/privacy_policy

Webcast and Audio Recording: Please note that this meeting will be webcast and audio recorded. You can view webcasts for up to 6 months after the meeting using this link: <http://braintree.public-i.tv/core/portal/home>. The meeting will also be broadcast via the Council's YouTube Channel.

Comments and Suggestions: We welcome comments to make our services as efficient and effective as possible. If you have any suggestions regarding the meeting you have attended you can send these to governance@braintree.gov.uk

PUBLIC SESSION

Page

- 1 Apologies for Absence**
- 2 Declarations of Interest**
To declare the existence and nature of any Disclosable Pecuniary Interest, other Pecuniary Interest, or Non-Pecuniary Interest relating to Items on the Agenda having regard to the Code of Conduct for Members and having taken appropriate advice where necessary before the meeting.
- 3 Minutes of the Previous Meeting**
To approve as a correct record the Minutes of the meeting of the Local Plan Sub-Committee held on 24th November 2022 (copy previously circulated).
- 4 Public Question Time**
(See paragraph above)
- 5 Health and Well-being Impact Assessment** **5 - 15**
- 6 Sustainability Statement Guidance Note** **16 - 57**
- 7 Water Resources Management Plan - Consultation** **58 - 64**
- 8 Storm Overflow - Consultation** **65 - 72**
- 9 Urgent Business - Public Session**
To consider any matter which, in the opinion of the Chairman, should be considered in public by reason of special circumstances (to be specified) as a matter of urgency.

Exclusion of the Public and Press

To agree the exclusion of the public and press for the consideration of any Items for the reasons set out in Part 1 of Schedule 12(A) of the Local Government Act 1972.

At the time of compiling this Agenda there were none.

PRIVATE SESSION

- 10 Urgent Business - Private Session**
To consider any matter which, in the opinion of the Chairman, should be considered in private by reason of special circumstances (to be specified) as a matter of urgency.

Report Title: Health and Wellbeing Impact Assessment Guidance	
Report to: Local Plan Sub-Committee	
Date: 30th March 2023	For: Decision
Key Decision: No	Decision Planner Ref No: N/A
Report Presented by: Alan Massow	
Enquiries to: alan.massow@braintree.gov.uk	

1. Purpose of the Report

- 1.1. To agree the Council's Health Impact Assessment Guidance to assist the preparation of planning applications as per policy LPP49 – Health and Wellbeing Impact Assessment.

2. Recommendations

- 2.1 That the Health and Wellbeing Impact Assessment Guidance in Appendix 1 is approved.**
- 2.2 That the Health and Wellbeing Impact Assessment Guidance in Appendix 1 is not approved.**

3. Summary of Issues

- 3.1. With the adoption of the Section 2 Local Plan 2033, policy LPP49 – Health and Wellbeing Impact Assessment comes in to force.
- 3.2. This policy sets out the requirement that planning applications over a certain size and for hot food takeaways, have to undergo a Health Impact Assessment (HIA). As such developments of more than 50 dwellings, all C2 development (Residential institutions such as care homes and hospitals), and non-residential development over 1000 sqm will be required to do a HIA, as would proposals for hot food takeaways.
- 3.3. A Health Impact Assessment is defined as a tool which helps to identify and optimise the health and wellbeing impacts of planning.
- 3.4. For Local Plans, the assessment of Health Impacts is usually included in its Sustainability Appraisal and Strategic Environmental Assessment, but for

planning applications an HIA can be done during the planning application process.

3.5. Appendix 1 includes the proposed template for Health Impact Assessments to be used by developers and agents to assess the impacts of their proposals in Braintree District.

3.6. The document includes guidance on when a HIA should be carried out, what should be included in it, and how any impacts should be assessed. The guidance encourages an assessment process similar as to that carried out by a SA/SEA, with each subject being assessed between significant positive and significant negative impacts.

3.7. Table One of the guidance provides some subjects with more detailed examples of what sort of planning issues these may be, what impacts on health and wellbeing may be identified and possible mitigation or enhancement measures which could offset any health and wellbeing impacts.

3.8. Once completed the HIA can be used by the Council when undertaking pre-application discussions or when determining a planning application, and officers will be able to assess whether any further measures would be required to mitigate any negative impacts.

4 Next Steps

4.1 Once agreed the HIA will be made available on the Council's website so that agents and developers will be able to use it.

5 Options

5.1 To approve the Health and Wellbeing Impact Assessment Guidance.

5.2 To not approve the Health and Wellbeing Impact Assessment Guidance.

6 Financial Implications

6.1 No additional costs other than officer time when assessing submitted any HIA.

7 Legal Implications

7.1 None.

8 Other Implications

8.1 None

9 Equality and Diversity Implications

9.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:

- a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
- b) Advance equality of opportunity between people who share a protected characteristic and those who do not
- c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

9.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

9.3 An EQI has been undertaken for the Health and Wellbeing Impact Assessment which has concluded that there was no impact or a positive impact.

10 Background Papers

<https://www.essexdesignguide.co.uk/supplementary-guidance/health-impact-assessments/>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929230/HIA_in_Planning_Guide_Sept2020.pdf

Braintree District Local Plan 2013-2033 (July 2022).

11 List of Appendices

Appendix 1 – Health and Wellbeing Impact Assessment.

Health and Wellbeing Impact Assessment (HIA) for Development Management Proposals - Guidance note for developers/agents

Introduction

The Health and Wellbeing Impact Assessment (HIA) guidance is intended to help developers carry out the process of HIA and supports the implementation of Local Plan policy LPP49 – Health and Wellbeing Impact Assessments. Development proposals will be required to assess their impact upon health and wellbeing, the capacity of existing health services and facilities, and the promotion of health improvement activities.

HIA is a tool which is used to assess potential health and wellbeing implications of a proposed development and should consider the positive impacts of a development on health and wellbeing and how these can be maintained and/or maximised and the negative impacts of the proposal and how these can be overcome or mitigated.

The HIA process helps to ensure that health and wellbeing is appropriately considered at the pre-application and planning application stages of a proposal.

The HIA is used in two ways.

Firstly, developers and consultants should use HIA when preparing development proposals in order to assist with design decisions and to demonstrate the benefits the proposals has on health and wellbeing.

Secondly, the Local Planning Authority (LPA) and health bodies can use the HIA to evaluate development proposals and to provide feedback on any issues identified, and ways in which the development proposal could be improved. The HIA will inform the decision-making process.

When should a HIA be carried out?

As set out in Local Plan policy LPP49 of the Adopted Local Plan, a HIA should be submitted to support all developments over 50 residential units, all C2 development and non-residential developments over 1000 sqm. A HIA also needs to be undertaken for hot food takeaway proposals.

What needs to be included in a HIA?

- Project Summary – A description of what is being proposed.
- Consultation – What consultation has been carried out with relevant groups such as the health authority or police and the local population for example.
- Area/Population – In which area of the district is the development located, and what is the population/demographic of that area? Does the area have any indicators of deprivation.
- The capacity of existing health services and facilities in the area,
- An assessment of health improvement activities available in the local area.

Key areas which should be assessed and included within the HIA include;

- Location
- Housing
- Health, (Physical Activity, Diet etc.)
- Air Quality and Noise
- Transport
- Economy and Employment

- Climate Change and Energy Use
- Recycling
- Access to services (Both public and private day to day services such as shops)
- Crime/Anti-social Behaviour
- Equality
- Community.

Examples of the types of information which can be assessed under these bullet points is included in Table One below.

Each of the above categories should be fully explored and considered within the HIA. The HIA should highlight the positive health impacts arising from the development and how these can be maximised by the development. The HIA should also include the adverse impacts of the proposal and details what actions have been undertaken to minimise these or how they will be mitigated. The proposal should be developed incorporating the outcomes of assessment and this should be evidenced within the HIA.

Impacts should be assessed as;

++	+	0	-	--
Significant Positive Impact	Positive Impact	No, Neutral or unknown impact	Negative Impact	Significant Negative Impact

Where possible the rating should be supported by evidence. For positive or negative impacts, a description of the impact should be included and a reference to any supporting evidence. If no impact is identified this should also be noted.

The HIA should conclude with an overall assessment of the Impact after positives have been maximised and the negatives overcome or mitigated.

A draft HIA should be submitted for consideration at the pre-application stage, with a final HIA being submitted alongside any subsequent planning application.

If significant adverse health and wellbeing impacts are identified planning permission will be refused unless infrastructure provision and/or funding to reasonably meet the health service requirements of development are provided as per policy LPP49.

The table below provides examples of different planning issues and potential health and wellbeing impacts and examples of possible mitigation/enhancement measures. This is not an exclusive list.

Table One

Subject	Planning Issue	Impact on Health and Wellbeing	Possible mitigation/enhancement measures
Location	Settlement Hierarchy Connectivity	More isolated developments dependent on car use, lack of opportunities for cycling and walking	Connect new residential developments to existing area with footpaths and cycleways.
Housing	Location Affordability	Poorly designed homes fail to meet the needs of	Provision of affordable housing,

Subject	Planning Issue	Impact on Health and Wellbeing	Possible mitigation/enhancement measures
	Design Construction Mix Energy/Water Efficiency	residents and can be expensive in to maintain and heat. Homes should be adaptable, and different types of homes and methods of ownership should be available to meet the needs of local people. Homes located next to emitters of noise or pollution can have a detrimental impact on health.	Energy efficient materials, accessible homes which can be adapted depending on the life stage of the occupant. Sustainability located homes can help residents access health services. Well-designed homes can provide good natural lighting into homes which can also help energy efficiency.
Health	Health facilities, Formal and informal recreation and green spaces, availability of fast food/takeaways or healthy alternatives, Local health facilities e.t.c	Regular exercise can help reduce the risk of various health conditions. Ease of access to unhealthy food can lead to unhealthy choices. Availability of local health care facilities.	Provision of green space and recreation facilities which are accessible to all, design which enables use of walking and cycling and facilities to support those activities. Promoting a range of food retailers in local centres and providing the opportunity for people to grow their own food.
Air Quality & Noise	Construction operations and vehicle movements during construction and ongoing vehicle and noise during operation of the development. Urban design. Location of noisy or polluting land uses. Position and design of roads.	Disturbance and stress cause by construction activity Site safety. Dust and poor air quality can have a significant negative impact on health contributing to an increased incidence of lung and heart disease and the potential for impact on people with asthma. Noise pollution can be detrimental to health and result in sleep disturbance and mental health problems like depression and stress. This can also result in poor educational attainment for children.	Use of the considerate constructor's scheme. Ensure appropriate visual and noise buffers. Ensure alternatives to car use are available, limit HGV movements, Assessment of noise and air pollution to identify problem areas. Locate homes away from in appropriate locations such as commercial or traffic noise, and emitters of odours and other forms of pollution.

Subject	Planning Issue	Impact on Health and Wellbeing	Possible mitigation/enhancement measures
Transport	Promotion of walking and cycling, minimising car use and safe connectivity for all road and public rights of way users.	Reduce dependency on the car, ensure that sustainable transport options are available such as walking, cycling and public transport. This can have a positive impact on health by encouraging physical activity as well as reducing car use and its associated negative impacts.	<p>Traffic calming to improve road safety and promote a safer environment for other users.</p> <p>Locating development close to local services and amenities to encourage people not to drive.</p> <p>Ensure good links to public transport, encouraging clusters of services to reduce the need to travel. Connect to the wider area.</p>
Economy and Employment	Local Employment Opportunities, healthy workplaces, suitable premises, Supporting home working	The Government's aim is for planning decisions to support business. This includes seeking to address potential barriers to investment such poor education and skills.	<p>Provision of education facilities for all ages.</p> <p>Apprentice and education schemes.</p> <p>Mixed use development providing local employment opportunities.</p>
Climate Change and Energy Use	<p>Energy Efficiency.</p> <p>Effective use of water.</p> <p>Incorporation of renewable energy generation.</p> <p>Planning in nature.</p>	Lack of heating or ability to cook food could impact health. Unchecked climate change leading to more extreme weather conditions can impact vulnerable members of the community.	<p>Well-designed places can help limit weather extremes.</p> <p>Provision of on-site renewable energy.</p> <p>Electric car charging.</p> <p>Cycling and walking provision.</p>
Recycling	Diversion of waste away from landfill.	Limiting need for unsustainable landfill. Sense of wellbeing.	Provision of recycling facilities for domestic and commercial use, publicly available recycling points, Upcycling.
Access to Services	Services should be located in sustainable and accessible locations.	Inaccessible services may impact on a person's health and wellbeing. Long journeys	Centrally located services accessible by a variety of transport modes, in sustainable locations.

Subject	Planning Issue	Impact on Health and Wellbeing	Possible mitigation/enhancement measures
	Provision of sufficient services to meet local demand.		
Crime and Anti Social Behaviour	Poor design creating limited overlooking of public areas, Lack of street lighting, lack of enforcement, security measures creating the impression of unsafe places.	Crime or the perception of crime can lead to people not going out or using the car instead of walking/cycling.	Keeping public spaces clear of graffiti and litter. Appropriate lighting and security. Establishment of neighbourhood watch groups.
Equality	Creating homes, places and spaces which are accessible to all.	Lack of inclusivity can result in poor mental health. Community Tensions.	Ensuring accessible design throughout. Create shared inclusive spaces.
Community	Well designed places. Range of house types for all age groups. Provision of community facilities.	Limited opportunities to interact with other people can impact a persons mental health, create barriers or distrust between different groups.	Multi use community facilities. Safe public meeting spaces.

Sources

The following resources can assist with the production of a HIA.

<https://www.essexdesignguide.co.uk/supplementary-guidance/health-impact-assessments/>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929230/HIA_in_Planning_Guide_Sept2020.pdf

Equality Impact Assessment

Basic



This basic impact assessment is an initial screening process to help identify if a full Equality Impact Assessment is required and, if it isn't, to record the reasons why.

It considers positive, negative or no impact on each of the 9 protected characteristics in relation to addressing the 3 aims of the Equality Duty that we as a public body must give due regard to;

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Directorate

Planning

Service

Planning Policy

Title of policy, strategy, project or service

Health and Wellbeing Impact Assessment Guidance

Is the policy, strategy, project or service;

Existing

☐

New/proposed

☒

Changed/Reviewed

☐

Q 1. Aim of the policy, strategy, project or service

To provide Guidance on the use of Local Plan Policy LPP49 – Health and Wellbeing Impact Assessment.

Q 2. Who is this policy, strategy, project or service going to benefit or have a detrimental impact on & how?

Local residents.

Q3. Is this policy, strategy, project or service aimed at one of the protected characteristics?
If so, what justification is there for this?

No.

Q 4. Thinking about each of the protected characteristics does or could the policy, strategy, project or service have a negative or positive impact?

Group	Negative	Positive/ No impact	Unclear
Age	ÿ	X	ÿ
Disability	ÿ	X	ÿ
Gender reassignment	ÿ	X	ÿ
Marriage & civil partnership (only in respect of eliminating unlawful discrimination).	ÿ	X	ÿ
Pregnancy & maternity	ÿ	X	ÿ
Race	ÿ	X	ÿ
Religion or belief	ÿ	X	ÿ
Sex	ÿ	X	ÿ
Sexual orientation	ÿ	X	ÿ

If the answer for any group is 'negative' or 'unclear' do a full EIA

Q5. Thinking about each of the protected characteristics does or could the policy, strategy, project or service help to support the 3 aims of the Equality Duty?

Group	Yes	No	Unclear
Age	X	ÿ	ÿ
Disability	X	ÿ	ÿ
Gender reassignment	X	ÿ	ÿ
Marriage & civil partnership (only in respect of eliminating unlawful discrimination).	X	ÿ	ÿ
Pregnancy & maternity	X	ÿ	ÿ
Race	X	ÿ	ÿ
Religion or belief	X	ÿ	ÿ
Sex	X	ÿ	ÿ
Sexual orientation	X	ÿ	ÿ

If the answer for any group is 'no' do a full EIA

Q 6. What evidence has been used (e.g. data, feedback, consultation & engagement, surveys) that may influence the policy, strategy, project or service?

Group	Evidence
Age	Consultation/community engagement
Disability	Consultation/community engagement
Gender reassignment	Consultation/community engagement
Pregnancy & maternity	Consultation/community engagement
Race	Consultation/community engagement
Religion or belief	Consultation/community engagement
Sex	Consultation/community engagement
Sexual orientation	Consultation/community engagement

Q 7. Using the responses to questions 4 & 5 should a full EIA be carried out on this policy, strategy, project or service?

Yes

☐

No

☒

Provide your reasons for your response showing how you have considered due regard

Local Plan policy LPP49 – Health and Wellbeing Impact Assessment which the Health Impact Assessment Guidance is based off has been subject to several rounds of consultation. This document is a guidance note rather than a SPD.

Completed by (Print name):

Alan Massow

Signature :

AM

Approved by Head of Service (print name):

Emma Goodings

Signature :

EG

Date:

08/03/23

Report Title: Sustainability Statement Guidance Note	
Report to: Local Plan Sub-Committee	
Date: 30th March 2023	For: Decision
Key Decision: No	Decision Planner Ref No: N/A
Report Presented by: Gary Sung, Senior Planning Policy Officer	
Enquiries to: EM: gary.sung@braintree.gov.uk; Ext. 2525	

1. Purpose of the Report

- 1.1 To agree the Sustainability Statement Guidance note which provides additional guidelines to adopted Local Plan policies for improving energy efficiency, reducing carbon emissions, and adapting to the impacts of Climate Change.

2. Recommendations

- 2.1 To approve the Sustainability Statement Guidance Note (Appendix 1) for use by decision makers in the consideration of planning applications of 1 or more new dwellings.
- 2.2 To note that changes to NPPF (National Planning Policy Framework) 2023 and the secondary legislation supporting the Environment Act 2021, both due to be published in 2023, could require reciprocal amendments to the Guidance Note.
- 2.3 To note that the Cabinet Member for Planning and Infrastructure, in consultation with the Head of Planning and Economic Growth, can make minor changes to the Sustainability Statement Guidance Note.

3. Summary of Issues

- 3.1 According to the Braintree Climate Change Strategy, housing and industry/commerce uses comprises of around 25% and 20% of carbon emissions respectively, with another circa 50% emissions produced from transport. The Council is committed to achieving net-zero carbon emissions by 2050 which means targeting these sources of carbon emissions to bring effective reductions.
- 3.2 It is estimated that 75% of the buildings that will exist in 2050 are already built which means retrofitting existing buildings will need to be part of the future package of measures. For the 25% of buildings that have not yet been constructed, Local Plan policies and decision making in development

management can make a difference by focussing on largest sources of household and employment buildings emissions. These are space heating, hot water heating and movement of goods and services.

- 3.3 A Sustainability Statement attached to a planning application will demonstrate how a new residential or employment development will be constructed according to the principles of mitigating and adapting to climate change. It will summarise the sustainability credentials of the development to decision makers while encouraging developers to consider building to a higher standard of sustainability. This will be achieved through a set of assessment questions which tests the performance of the development against a set of sustainability technical standards.
- 3.4 For most developers, the main issue of having higher sustainability standards is the impact on build cost. The 2017 Braintree Economic Viability Study factored in costs on development to adhere to all the policy requirements of the Braintree Local Plan, including the ones on Climate Change, Resource Efficiency, Energy Generation, Energy Efficiency and Renewable Energy¹. Local Plan policy or Building Regulations 2021 is the level at which the minimum standards are set so there should be no additional burden for meeting these standards proposed in the Sustainability Statement.
- 3.5 Conversely, implementation of higher standards of energy efficiency, renewable energy, and climate change adaptation, etc. would have untested viability implications on development. Higher standards are strictly aspirational, but viability study suggests that there is headway in residual land value to accommodate the additional cost of implementation. However, bringing in higher standards than the Local Plan policy requirement would need a public consultation in accordance with the SCI to be undertaken and for the Council to follow a statutory adoption process for an SPD (Supplementary Planning Document).
- 3.6 Of course, like all costs in 2022/23, materials, labour and energy has been upwardly affected by inflation. However, house prices and interest rates have also risen since 2017. It is unknown how the tandem rise of inflation and interest rates has affected the viability of development therefore the Sustainability Statement is being proposed as guidance to support the Local Plan policies with encouragement that higher standards of sustainability is adopted by developers, and not an SPD containing additional policies to be adhered to. As with other Local Plan policies, a site-specific viability appraisal may be taken into consideration by the decision maker should a development fall short of minimum standards due to cost.
- 3.7 For smaller developers, the requirement for additional design documentation and professionally commissioned evidence could represent a significant additional burden. Therefore, the thresholds for applying the standards in the Guidance Note should be carefully considered. Currently, the Climate

¹ It should be noted that the publication draft Local Plan included renewable energy policies which were struck out by the Inspector at examination, saving £2,500 per dwelling.

Change policy in the adopted Local Plan requires sustainability statements for all development, other than very minor developments, which means including extensions, change of use and other minor developments. As detailed in the guidance note, officers are proposing to increase this threshold to all residential developments of 1 or more new dwellings or 501sqm of new non-residential floorspace and it is recommended that a reduction in this threshold should be considered in a future review of the Guidance Note.

- 3.8 Aside from the above viability issues, officers are mindful of introducing a new Guidance Note during a period of review for national policy. Both the National Planning Policy Framework 2023 (NPPF) and the secondary legislation for the Environment Act 2022 are due to be published later this calendar year. The final contents of these documents remain unknown and could render the Sustainability Statement Guidance Note out of date shortly after adoption.
- 3.9 Officers will apply the adopted Local Plan policy for a sustainability statement by requesting that a Guidance Note assessment and sustainability statement be attached to new planning applications by making changes to the local validation list. An effort has been made to avoid overlap on matters which is already covered by the local validation list however, this is under review. In addition, the new technical standards may require tweaking and review in the first year of operation.
- 3.10 For these reasons, officers recommend that delegated approval is granted to make minor changes to the Sustainability Statement Guidance Note.

4. Summary of the Sustainability Statement Guidance Note

- 4.1 The note sets out the context in national and local policy, including adopted Local Plan policy and the Council's Climate Change strategy. There is a focus on the principles of climate change and mitigation which is part of policy LPP71 in the Local Plan. These are broken down into two categories:
- 4.2 Firstly, there is mitigation of carbon output during construction and operation which will require measures such as:
- High levels of Energy Efficiency
 - Sustainable Transport options
 - Recycling and waste reduction
 - Facilitate homeworking
- 4.3 Secondly, there is adaptation of development to cope with the higher frequency of extreme weather due to climate change with the measures below:
- Water Efficiency
 - Avoid or manage flood risk
 - Manage surface water flood risk

- Overheating
 - Natural shading and cooling
 - Green infrastructure networks
- 4.4 To accommodate these principles the note is divided into 6 sections, the latter 5 sets out the minimum standards within assessment questions and provide some further information for achieving exceptional or outstanding standards. For example, the minimum standard for fabric u values for walls is 0.26 (W/M 2.K) which is the value required by Part L of the building regulations 2021, while the exceed standard is set at the proposed future homes standard 0.18 (W/M 2.K) and the outstanding standard is as recommended by London Energy Transformation Initiative (LETI) at 0.09 - 0.12 (W/M 2.K).
- 4.5 The climate change principles are addressed in each section as follows:
- Design principles
 - § *High levels of Energy Efficiency*
 - § *Recycling and waste reduction*
 - Energy efficiency
 - § *High levels of Energy Efficiency*
 - Renewable energy and low carbon heat generation
 - Climate change adaptation
 - § *Water Efficiency*
 - § *Avoid or manage flood risk*
 - § *Manage surface water flood risk*
 - § *Overheating*
 - Green and blue infrastructure
 - § *Natural shading and cooling*
 - § *Green infrastructure networks*
 - Sustainable movement
 - § *Facilitate homeworking*
 - § *Sustainable Transport options*
- 4.6 The guidance note has been written for use by developers, decision makers, planning officers and quality review panels. It will apply to all developments with 1 or more new dwellings and non-residential dwellings of 501sqm or more – further details within the guidance note.
- 4.7 It promotes the widespread use of sustainability statements which are already common for major applications and incorporates the use of a sustainability checklist in the local validation list. The minimum standard reflects the requirements as set out in the Local Plan and parts L and O of building regulations 2021 respectively, with higher standards promoted as optional guidance. It is not necessary to meet the minimum standards of the checklist to gain planning permission however it will be necessary for applicants to meet any requirements of Building Regulations. Use of the checklist will make it easier for decision makers to see any higher sustainability standards of a development which will be beneficial for applicants.

5. Options

- 5.1 Agree the recommendations thus agree that the Sustainability Statement Guidance Note is adopted as part of the local validation list and that delegated authority to make minor changes is granted; this option is recommended.
- 5.2 To modify the threshold at which the Sustainability Statement Guidance Note applies thereby drawing more development or less development into the policy. To modify the assessment questions to change the new technical standards.
- 5.3 Do not adopt the Sustainability Statement Guidance Note; this option would allow more time for the Council to set out its position on the issue but would delay the implementation of higher energy efficiency and climate change adaptation standards.

6. Financial Implications

- 6.1 No financial implications.

7. Legal Implications

- 7.1 There are no legal implications arising out of this report.

8. Other Implications

- 8.1 No other implications identified.

9. Equality and Diversity Implications

- 9.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:
 - (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
 - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not
 - (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 9.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

9.3 The Equality Impact Assessment indicates that the proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic.

9.4 The Sustainability Statement Guidance Note does not have any EQIA implications.

10. List of Appendices

- Appendix 1: Sustainability Statement Guidance Note

11. Background Papers

- Braintree District Local Plan 2033.

Section 2 Local Plan

Sustainability Statement Guidance Note

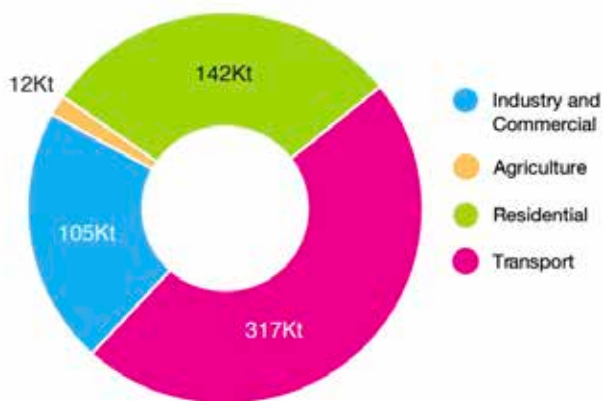
For new Residential and Non-residential buildings

Version 1.0 2023

Introduction.....	3
What is a Sustainability Statement?	4
How to measure progress	6
Who is this guidance for?	7
What type of development will this guidance be applied to?	7
National and Local Policy	8
Sustainability Statement Checklist.....	12
Design Principles	12
Energy Efficiency	15
Assessment Questions	17
Renewable Energy and Low Carbon Heat Generation	19
Assessment Questions	21
Climate Change Adaptation	22
Assessment Questions	24
Green and Blue Infrastructure	25
Assessment Questions	26
Sustainable Movement	27
Assessment Questions	30
Information to be provided in a Sustainability Statement.....	31
Summary of minimum standards	32
Appendix A: Sustainability Statement Checklist Purpose: ensure the Sustainability Statement contains the information required for assessment.....	33

Introduction

Braintree District sources of Carbon Dioxide emissions (KT CO₂)



Levels of carbon dioxide emissions in our District (KT CO₂) since 2005



Braintree Climate change strategy

Housing and employment can contribute significantly to the carbon footprint Braintree residents. National and local data (above) suggests that residential emissions typically account for around 25% of carbon emissions at the individual level. This includes not only the emissions associated with the operation of the home (e.g., energy used for heating, cooling, and lighting), but also emissions associated with construction and maintenance. Businesses account for another 20% meanwhile Transport produces nearly 50% of CO₂ emissions in the district.

Construction and production of building materials, transportation of materials to the site, and installation of the home's systems and appliances all generate carbon emissions. Additionally, operation and maintenance will also contribute to the environmental impact of the dwelling.

In terms of operational energy use, the source of energy used to heat and power the dwelling or premises is a critical factor in determining the ongoing carbon footprint. Developments powered by electricity generated from renewable sources generated on-site, such as solar or wind, have a lower carbon footprint compared to homes powered by the national grid using fossil fuels, such as natural gas. According to the Business, Energy and Industrial Strategy (BEIS), space and water heating in buildings can account for up to 66% of the total energy consumption therefore a focus on measures to improve heating efficiency such as air tightness, air or ground source heat pumps and solar gain will have measurable effects. The size of the home also plays a role, as larger homes require more energy to operate and maintain, which can result in higher carbon emissions.

Embedded behaviour and lifestyle choices such as active travel, using energy-efficient appliances, turning off lights when not in use and reducing unnecessary energy consumption can also help reduce the carbon footprint associated with work or living. Emissions because of transportation, whether for work, leisure or the delivery of goods and services has remained consistent over the 15 years despite falls in other sectors such as electricity generation. Consideration should be given to designing new residential and employment areas, places and buildings which have active and healthy lifestyles choices embedded in them. In this district, there should be a focus on making shorter journeys more attractive by reshaping the urban areas to truly prioritise active travel as a sustainable alternative.

To have the greatest impact on reducing the carbon footprint for homes and businesses in the district we should reduce those emissions associated with heating buildings and hot water, and transport of goods and people.

This Sustainability Statement Guidance Note is an interim guide is written to assist developers seeking to submit a planning application in the time until adoption of a Sustainability Statement SPD (Supplementary Planning Document). It brings basic clarity to policies to enhance submitted information, particularly for Sustainability Statements accompanying applications (when these are required). The guide focusses on the information decision makers, such as planning officers, expect to ensure information is concise and efficient.

What is a Sustainability Statement?

A sustainability statement should be attached a planning application to demonstrate that a new residential or employment buildings are constructed in accordance with the principles of mitigating and adapting to climate change. It should allow decision makers evaluate the environmental, social,

and economic sustainability of a proposed development and to make an informed decision on whether to grant planning permission. A new building can have a significantly impact on the environment, including energy use, carbon emissions during construction, water consumption and waste production. The adopted Braintree Local Plan suggests the Climate Change principles below:

Principles of mitigation of carbon output during construction and operation

- High levels of Energy Efficiency
- Sustainable Transport options
- Recycling and waste reduction
- Facilitate homeworking

Principles of adaptation to climate change

- Water Efficiency
- Avoid or manage flood risk
- Manage surface water flood risk
- Overheating
- Natural shading and cooling
- Green infrastructure networks

Written sustainability statements which are attached to planning applications should include the following:

1. Description of the development: describe the proposal and include location, size, use and intended occupation.
2. Outline the sustainability principles in use, include the design objectives and target emissions rate.
3. Design and construction: show how the building was designed with these principles in mind, summarise any consideration of building materials, building orientation, energy-efficient heating and ventilation systems, and their alternatives.
4. Energy use: how will the building minimise energy use?
5. Water use: how will the building minimise water use?
6. Waste management: how can waste be reduced during construction? How will the building accommodate waste management when in operation?
7. Sustainable Transport: there should be a range of sustainable options and prioritisation of walking and cycling.

Aiming towards net-zero by 2050

In July 2019, the Council proclaimed a climate emergency and pledged to support communities within Braintree District to reduce the impacts of climate change. This followed the Government's

commitment to extend the UK carbon target to reduce carbon Emissions from 80% of 1990s levels to net zero by 2050.

The Braintree Climate Change strategy has key priorities split across 7 themes which aim to tackle carbon emissions at a district scale. These are resources, energy conservation, built environment, transport, business and green economy, natural environment and adapting to Climate Change. At the district scale, new residential and employment construction and occupation is an important source of emissions to target for reduction. In the priorities for the built environment, it states that:

‘Planning functions are a key lever in reducing emissions and adapting localities to a changing climate. We will make use of our planning and building powers to require higher energy efficient standards and design standards in new builds and extensions, where we are allowed to do so through national policy.’

One of the key tools available to the Council to help steer communities towards net zero is the Local Plan and its policies. Local Plan policy LPP71 on Climate Change requires mitigation and adaptation in developments which would respond to Climate Change, where lower emissions would contribute to the Council’s aims and objectives on the path to net zero carbon.

Key points timeline on the road to net zero:

- 2021 Adoption of BDC Climate Change Strategy
- 2021/22 Adoption of the Braintree Local Plan
- 2022 Part L new building regulations 2022
- 2023 Adoption of sustainability statement guidance note
- 2025 new Building regulations - Future homes standards
- 2030 new future home standards expected
- 2050 Net Zero

A Sustainability Statement should demonstrate the principles of Climate Change mitigation and adaptation and show what and how mitigation measures have been incorporated into the scheme.

How to measure progress

The goal is to reach net zero in carbon emissions, however there can be flaws in the energy to carbon conversion which favours inefficient renewable energy generation via the national grid above a fabric first approach. The London Energy Transformation Initiative (Leti) recommends that building performance should not be measured in terms of carbon but instead simplified to energy use. This is called absolute Energy Use Intensity (EUI) which is measured in kWh/m².yr (Gross Internal Area) GIA for space heating, hot water and overall energy demand at the meter. A Part L compliant residential building is estimated to achieve 140 kWh/m².yr.

Leti also recommends that post construction building performance is carried out to ensure that the performance gap (the difference between the energy efficiency that was promised at the design stage and the energy efficiency that is achieved in practice) is eliminated. Building Research Establishment Environmental Assessment Method (BREEAM) certification is post construction and will not need additional post construction certification policies. We are unable to bring in performance measurement certification for this Guidance Note however it will be considered for future iterations.

Who is this guidance for?

- **Applicants**

This guide and checklist should be used by applicants at design stage and if applicable, for design codes and the production of the illustrative masterplan and parameter plans. Ideally, a completed sustainability checklist (Appendix A) should accompany the planning application to ensure that the applicant has considered and incorporated sustainability measures into the design.

- **Decision makers**

The checklist summarises the carbon mitigation and adaptation features of the development in a visual and accessible way such that the positive and negative credentials are highlighted. This will inform decision makers on how well the development performs against local and national standards or policy.

- **Planning Officers**

The checklist can be used by officers to assess how the submitted planning application performs against climate change mitigation and adaptation policies. This guidance note will help guide pre-application discussions and inform decision making for delegated decisions and the checklist could be included with recommendations to planning committee.

- **Quality Review Panel**

For larger developments and certain developments in some neighbourhood plan areas, a Quality Review Panel (QRP) report will be required as part of the planning application. QRP panel members are independent experts from a range of backgrounds who scrutinise the design and layout of development proposals. The Checklist can be used by Quality Review Panels to help inform sustainability and climate change mitigation and adaptation discussions.

What type of development will this guidance be applied to?

The adopted Local Plan requires a sustainability statement should be used to demonstrate the principles of climate change mitigation and adaptation in all but 'very minor applications'. For this

guidance note, we have interpreted this to mean all new residential and residential-led mixed-use developments of 1+ units, or non-residential developments (all use classes) of floorspace equal to 501 sq.m. or more.

Residential alterations, extensions, conversions and annexes and non-residential buildings below 501sq.m are excluded. Additionally, developments which are not buildings are excluded from BREEAM. There is no exclusion for historic buildings however the need to preserve the historic character and appearance of these buildings will be assessed against the performance of the checklist.

Change of Use Prior Approval (COUPA) arising from a change of use class for an existing building does not require a full planning application therefore the Local Plan policies and this guidance note will not apply however in some circumstances Part L of the building regulations will still be required.

We will review these thresholds for future iterations of this guidance note, or for a future SPD.

National and Local Policy

Planning and Energy Act 2008 aims to support the transition to a low-carbon economy by promoting renewable energy, energy efficiency, and carbon capture and storage. It gives Local Planning Authorities the powers to impose reasonable requirements for complying with energy efficiency standards that exceed the requirements of the building regulations. The Climate Change Act 2008 sets legally binding targets for reducing emissions by 80% from 1990 levels by 2050 at the national level. These two statutory documents underpin carbon reduction policies in the Local Plan.

NPPF (2021):

'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.' (para 152)

'Plans should take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.' (para 153)

'New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.' (para 154).

'To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts); b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.' (para 155)

'In determining planning applications, local planning authorities should expect new development to: a) comply with any development plan policies on local requirements for decentralised energy... and b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.' (para 157)

NPPG:

'...local planning authorities should pay particular attention to integrating adaptation and mitigation approaches and looking for 'win-win' solutions that will support sustainable development. This could be achieved in a variety of ways, for example:

- by maximising summer cooling through natural ventilation in buildings and avoiding solar gain;*
- through district heating networks that include tri-generation (combined cooling, heat and power); or*
- through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle.'* (Paragraph 004 Reference ID: 6-004-20140612):

Local requirements (for sustainability and zero carbon) should form part of a Local Plan following engagement with appropriate partners and will need to be based on robust and credible evidence and pay careful attention to viability. (Paragraph 009 Reference ID: 6-009-20150327)

Passive solar design is available in the National Design Guide... (Paragraph 010 Reference ID: 6-010-20140306)

... be aware of and avoid risk of maladaptation (adaptation that could become more harmful than helpful). For example, designing buildings to maximise solar gain in winter without thinking through the implications for overheating in summer. (Paragraph: 012 Reference ID: 6-012- 20190315)

Building Regulations:

Part L is a section of the UK Building Regulations that sets standards for the energy performance of buildings. The latest version of Part L, 2021, was approved for use by the Government on the 15th of June 2022, this should result in at least 19% improvement in energy performance over the 2013 Buildings Regulations. Part O was also introduced on this date which aims to tackle overheating.

S2 Local Plan Policy LPP74:

'The Council will adopt strategies to mitigate and adapt to climate change. In addressing the move to a low carbon future for Braintree District, the Council will plan for new development in locations and ways that reduce greenhouse gas emissions.

Applicants will be expected to demonstrate that measures to lower carbon emissions, increase renewable energy provision and adapt to the expected impacts of climate change have been incorporated into their schemes, other than for very minor development.

Planning permission will only be granted for proposals that demonstrate the principles of climate change mitigation and adaptation into the development.

Guidance will be made available by the Council on the contents to be included in the Sustainability Statement. The Council intends the District to meet part of its future energy needs through renewable and low carbon energy sources and will therefore encourage and support the provision of these technologies subject to their impacts on landscape and visual amenity, residential amenities including noise, pollution, heritage assets and their settings, biodiversity and designated nature conservation sites, soils, and impact on the highway, being acceptable.'

Policy LPP 74 Climate Change states that applicants for **all** planning applications other than for very minor development will be expected to submit a sustainability statement.

We will interpret 'very minor developments' in the above policy to mean certain developments which do not result in the creation of a new dwelling, such as extensions and refurbishments thereby expecting submissions of a Sustainability Statements (to which this guidance note applies) to planning applications for outline, full, hybrid and reserved matters applications of the following developments:

- Major proposals of 10 or more dwellings
- Minor residential-led proposals of 1 to 9 new dwellings.

- New or converted non-residential uses, including community use, employment or retail floorspaces, of 501 sqm or more.
- Replacement dwelling schemes.

We will relax requirements for a sustainability statement to be submitted for other types of development. COUPAs do not require a planning application and are also excluded.

A Sustainability Statement SPD will be produced by the Council incorporating detailed supplementary information however applicants are still required to demonstrate that measures to lower carbon emissions have been incorporated in their schemes at present time.

This guidance note has been produced to help applicants write and submit a Sustainability Statement for the period between adoption of the Local Plan and adoption of the SPD. The guidance also helps officers and decision makers assess the proposals (for development) against the principles of climate change mitigation and adaptation. These principles are stated in the supporting text of Section 2 Local Plan (para 6.54). For mitigation of carbon output during construction and while in use, we expect developments to have high levels of Energy Efficiency, offer a range of sustainable transport options, incorporate recycling and waste reduction and be able to facilitate home-working. For adaptation to climate change, developments should be water efficient, avoid or manage flood risk, manage surface water flood risk, manage overheating, include natural shading and cooling, and enhance and link with the green infrastructure network.

Sustainability Statement Checklist

Design Principles

The main design policies are at LPP52 of the section 2 Local Plan where many of the policies support sustainable travel and measures for environmental sustainability. Sustainable travel is covered further in the sustainable movement section of this Guidance Note.

Local Plan Policy LPP52

f. Development proposals will incorporate measures for environmental sustainability throughout the construction, occupation and demolition of the development; in relation to energy conservation, water efficiency, waste separation (internal and external), climate change, flood resilience and resistant construction and the use of materials with low overall energy requirements.

q. Developments should avoid single aspect dwellings that are: North facing; exposed to noise categories C or D; or contain three or more bedrooms. Where single aspect dwellings are proposed, the designer should demonstrate how good levels of ventilation, daylight and privacy will be provided to each habitable room.'

Local Plan Policy LPP 72

'The Local Planning Authority will encourage appropriate energy conservation and efficiency measures in the design of all new development. Such measures could include site layout and building orientation, natural light and ventilation, air tightness, solar shading, reducing water consumption and increasing water recycling to contribute to the reduction in their total energy consumption.'

On adaptable buildings

Policy LPP42:

'All new development should be in accordance with the national technical housing standards.'

'A minimum of 10% of new market homes on sites of 10 or more dwellings must meet Category M4(2) or Category M4(3)(2)(a)/(b) – Wheelchair Accessible dwellings of Building Regulations 2015, or as superseded, as appropriate.'

'All new affordable homes on ground floor level must meet Category M4(2) or M4(3). For developments within or adjacent to the Main Towns and Key Service Villages, 5% of all new affordable homes will be required to meet Category M4(3)(2)(a)/(b) – Wheelchair Accessible dwellings - of Building Regulations 2015, or as superseded, as appropriate.'

Local Plan Policy LPP48:

'Developments shall achieve a high standard of accessible and inclusive design to ensure that they... Are flexible and responsive taking account of the needs of different users.'

It is acknowledged that the other design policies in the Local Plan for layout and design can be in tension with optimising the layout of development for energy efficiency. As the Local Planning Authority will need to take these design trade-offs into account, it is important to discuss these issues with officers early in the planning application process. The design process is iterative where it may be necessary to be flexible and adaptable.

Sustainable Design Principles

These sustainable design principles should be considered at the earliest stages of the proposal. In order of priority, with A being the highest, we suggest that the following principles A-E are incorporated to make achieving higher sustainability levels easier.

A. Energy Hierarchy

Design of new developments should comply with the following Energy Hierarchy principles:

1. be lean: manage energy demand during operation through fabric and servicing improvements and the incorporation of flexibility measures
2. be clean: supply energy efficiently by exploiting local energy resources (such as secondary heat and by connecting to district heating networks).
3. be green: use renewable energy by maximising opportunities for producing, storing and using renewable energy on-site

Be seen, i.e. to monitor, verify and report on performance of energy efficiency design and build post construction will not be included in this iteration of the Sustainability Statement Guidance Note.

B. Orientation

Solar gain should be prioritised by designing layouts with south-facing fenestrations which absorb heat to warm buildings and spaces. This can significantly reduce the energy consumption of a building. Overheating during summer months can be managed by external shading (preferred), natural ventilation or by mechanical ventilation. A daylight and sunlight assessment can help provide more information on how much natural light each building in a development will be exposed to.

C. Fabric First, airtight and low thermal bridge

A building should prioritise incorporating a high performance materials for the walls, roof and floors to create a thermal envelope that has excellent energy efficiency. The thermal envelope needs to minimise heat loss to reduce the need for energy expenditure on building and space heating. This means focusing on a draught free (airtight) building, gaps in insulation and designing out conductive materials to reduce thermal bridging.

There are no proposals for post-construction evaluation of residential buildings in this iteration of the Sustainability Statement Guidance Note however this can be considered in future reviews.

D. Adaptable design

Residential dwellings should be able to adapt and respond to the changing needs of occupiers. The aim is to have a home that is suitable for use throughout the lifetime of the occupant and/or development. This should include buildings which are easily extendable to expand to growing space needs or can be adapted using stud walls for interior partitioning.

E. Embodied Energy

Embedded Carbon is emissions associated with the production and transportation of building material and components plus the energy used in the construction process. While we would encourage demonstration that use of building materials which have lower embodied carbon has been considered, for example through RICS's Whole Life Carbon Assessment, detailed consideration for the carbon footprint of the construction industry is beyond the scope of this guidance note and will not be assessed.

Energy Efficiency

Local Plan Policy

For new development, the LPA's aspiration is for energy efficient development that minimises space heating requirements and primary energy demand. This works in parallel with Building Regulation targets to deliver reductions in CO2 emissions. (para 6.66)

LPP 72 Resource Efficiency, Energy Generation and Energy Efficiency

'The Local Planning Authority will encourage appropriate energy conservation and efficiency measures in the design of all new development. Such measures could include site layout and building orientation, natural light and ventilation, air tightness, solar shading, reducing water consumption and increasing water recycling to contribute to the reduction in their total energy consumption.'

Reducing Energy Use is the first part of stage 1 (be lean) energy hierarchy and Energy efficiency is the second part. It is a key area to focus efforts due to the dominance of building and hot water heating in residential energy usage. The local plan policy suggests a range of measures aimed at passive heat management measures to reduce total energy use for building heating. As suggested above in this guidance note, this should be measured in EUI or Energy Use Intensity measure in kilowatt hour per meter squared, per year (kWh/m².yr) GIA.

MINIMUM STANDARD Guidance:

- For part L compliant residential developments, no additional information is required to be submitted.
- For non-residential developments, a **Pre-Assessment Report** and **Design Stage Assessment Report** should be submitted as applicable demonstrating that BREEAM 'Very Good' can be achieved (in accordance to BRE guidelines). BRE accreditation is required after completion.

If the above cannot be achieved using a fabric first approach, we suggest measures the following measures to exceed the minimum requirement:

- Use on-site renewable energy production (next section)
- Low-carbon heat generation (next section)
- Energy storage to smooth demand (e.g. battery, domestic hot water storage).

Guidance for EXCEEDING MINIMUM STANDARDS:

With the aim of achieving net zero, we **strongly** encourages all new development to exceed the requirements set by Part L or BREEAM 'very good' where relevant. Proposals should follow the

energy hierarchy (Be Lean, Be Clean) to minimise energy use as a priority. Bearing in mind that residential dwellings and most non-residential buildings currently emit the most carbon from heating buildings and water, developers, architects and designers should consider the following measures to improve energy efficiency performance:

Fabric First:

- Glazing specification
- Air tightness
- Additional insulation
- Thermal bridging
- Building services efficiency (for non-domestic)
- Reducing the 'dead leg' of water heating systems

Passive design:

- Orientate buildings for solar gain
- Be mindful of thermal properties of building materials
- Absorbent or reflective materials where appropriate
- Passive ventilation and heating systems

Site and layout:

- Sheltered planting to reduce the need for air conditioning
- Shared heat through party walls
- Internal layout of rooms so that occupied rooms are south-facing

Technology:

- Domestic hot water insulation and indirect heating systems
- Lighting and energy efficient appliances
- Demand smoothing
- Battery storage including power conversion systems, transformers, switches and monitoring
- Mechanical ventilation and heating systems

For residential development, a table like the one below should be included with the planning application to demonstrate that energy efficiency exceeds the requirements of Part L. Applicants may use an average energy performance for blocks of dwellings (e.g. flats) within a single building if desired.

Example table A for provision of information pertaining residential developments which exceed minimum standards:

Unit number/address	TPER*	DER*	% Improvement on Part L 2021

Target Primary Energy Rate (TPER) measured in kWh/m².yr

Dwelling/Building Emission Rate (DER) measured in kWh/m².yr

Assessment Questions

What is the operational energy needs of the building (residential)?

Minimum = 140 kWh/m².yr (Part L Building Regulation Standard)

Exceed = 70 or less (kWh/m².yr)

Outstanding = 46 or less (kWh/m².yr) (Passivhaus Standard)

Includes both regulated and an estimated average of unregulated energy (i.e. Space Heating + average energy allowance per user), as measured at the meter. Floorspace is Gross Internal Area (GIA).

What are the Fabric u-values of the building fixtures?

1) Walls

Minimum = 0.26 (W/M².K) = Part L Standard

Exceed = 0.18 (W/M².K) = Future Homes Consultation

Outstanding = 0.09 - 0.12 (W/M².K) = LETI Standard

2) Floors

Minimum = 0.18 (W/M².K) = Part L Standard

Exceed = 0.13 (W/M².K) = Future Homes Consultation

Outstanding = 0.09 - 0.12 (W/M².K) = LETI Standard

3) Roofs

Minimum = 0.16 (W/M².K) = Part L Standard

Exceed = 0.13 (W/M².K) = Future Homes Consultation

Outstanding = 0.09 - 0.12 (W/M2.K) = LETI Standard

4) Windows and Doors

Minimum = 1.6 (W/M2.K) = Part L Standard

Exceed = 1 to 1.4 (W/M2.K) = Future Homes Consultation

Outstanding = 1.0 Overall including frame (W/M2.K) = LETI Standard

Airtightness

Minimum = 8m³ (h·m²)@50Pa = Part L Standard

Exceed = 5m³ (h·m²)@50Pa = Future Homes Consultation

Outstanding = 3m³ (h·m²)@50Pa = LETI Standard

Example: 8m³ (h·m²)@50Pa means 8 cubic metres of air can escape per hour for every square metre of the envelope surface area (total wall area), with and internal air pressure of 50 Pascals. Passivhouse will typically be 1m² or less and will require mechanical ventilation to maintain comfortable indoor air quality.

Ventilation Strategy

Minimum =. Natural with extractor fans

Exceed = Mechanical extract with extractor fans

Outstanding = Continuous mechanical supply and extract with heat recovery

Renewable Energy and Low Carbon Heat Generation

Local Plan policy:

'It is important to recognise that small-scale housing schemes although limited, provide a valuable contribution to the overall outputs of renewable energy and to meeting energy needs locally and nationally.' (para 6.65)

'The 2012 NPPF (National Planning Policy Framework) supports the identification of opportunities for development to draw its energy from decentralised sources and for co-locating potential heat customers and suppliers. Decentralised energy can achieve greater carbon reduction and is more viable and cost-effective where connections can be made between day and night-time users, including new and existing development.' (para 6.67)

Both residential and non-residential developments are encouraged to include on-site renewable energy and low-carbon heat generation technologies by Local Plan policies. Decentralised energy generation is more efficient than national grid generation and transmission, even as the Government seeks to decarbonise the national energy generation sector. Energy storage such as lithium-ion battery storage can be paired with a solar panel system to store excess solar energy generated during the day and use it during the evening and night-time. This is often a cost-effective solution as it smooths out the peaks and troughs of energy supply and demand without drawing on the national grid. Both measures are supported by local plan policies.

There are separate policies for non-domestic renewable energy schemes such as solar farms and wind turbines, if your proposal includes renewable energy which is not within the curtilage of the dwelling or employment premises, it may be necessary to refer to policy LPP73.

MINIMUM STANDARD

- No policy requirement to generate renewable energy or incorporate low-carbon heat generation unless this is used to mitigate poor energy efficiency to achieve Part L of the Building Regulations.
- There is no further guidance to meet this requirement.

Guidance for EXCEEDING MINIMUM STANDARDS:

Developers should summarise all relevant plans and specifications submitted with the planning application where on-site energy supply is provided. This could be in an energy production statement showing how energy will be supplied more efficiently. For residential development of 10 or more, we have set a target of 10% or more on-site renewable energy generation to exceed minimum expectations.

Suggested measures to exceed the minimum requirement:

- Solar Photovoltaics (PV)
- Heat pumps (ground, air or water)
- Biomass burners/ boiler
- Mechanical heat recovery systems
- Domestic/micro combined heat and power system
- Hydropower
- Solar thermal
- Combined Heat and Power systems (CHP)
- District Heating schemes
- Wind turbines

For the majority of new residential and non-residential developments, we recommend consideration of air-source heat pumps and roof or garden mounted solar photovoltaics as the most common renewable and low carbon heat generation installations in the area. Peak demand smoothing and battery storage (see energy efficiency above) in combination with renewable energy generation can result in a significant reduction in carbon emissions of a development.

For residential development, a table like the one below should be included with the planning application to demonstrate the effectiveness of installed renewable energy generation. The sustainability statement should include an options assessment of alternative renewable energy schemes which were considered.

Example Table B for the assessment of carbon saved by renewable energy schemes:

	A		B	((A x B) / floor area)
Technology / Scheme	Energy generated (kWh/yr)	Alternate energy source	Alternate energy source carbon factor (tonnes CO2/kWh)	Carbon emissions mitigated (t.CO2/sqm./yr)
<i>e.g.Solar PV</i>		<i>grid electricity / gas heating .etc</i>		
<i>e.g.Heat Pump</i>				
Total				

Assessment Questions

What percentage of CO2 emission reduction is planned to be provided by on-site renewable energy?

Minimum = 0%

Exceeded = 10-20%

Outstanding = 21% and above

What on-site renewable energy technologies have been included within the development?

Minimum = none

Exceeded = Solar/wind/Air source or other heat pumps

Outstanding = CHP (Combined Heat and Power)/Solar Thermal

Climate Change Adaptation

Local Plan Policy Reference:

*'The best available evidence shows that we are seeing and can expect to see future changes in the global climate because of past and ongoing greenhouse gas emissions. In 2015, global temperatures rose more than one degree above pre-industrial levels, according to data from the Met Office. Temperatures are predicted to escalate in the future and it is therefore essential that in Braintree District we **prepare for greater frequency of extreme weather events**.'* (Para 6.47)

*'Climate change adaptation means ways that a development can be adapted to deal with the weather related consequences of climate change. **Using water more efficiently, reducing overheating and controlling rainwater run-off** are all examples of adapting a development to respond to changes in our climate. The plan already proposes some such strategies.'* (Para 6.55)

'To adapt to the effects of climate change, proposals should;

- Manage and conserve water resources*
- Demonstrate that **flood risk** from all sources has been avoided or managed*
- Use **Sustainable Drainage Systems** (SuDS)*
- Use layout, building orientation, design, and materials to ensure properties are not susceptible to **overheating***
- Include open space and trees/vegetation for **shading and cooling**, and to control surface water run-off*
- Create a better linked **habitat network** by conserving, creating or enlarging existing habitats'* (para 6.56)

LPP 72

*'All new dwellings shall meet the Building Regulations optional requirement for **water efficiency of 110 litres/person/day**.'*

Policies including the technical standards for managing flood risk and SUDS are published in full at LPP74 and LPP76 – we do not seek to repeat the text here. See also ECC's SuDS design guide for technical guidance.

Local plan policy supports building adaptation in response to a greater frequency of extreme weather events such as water stress, overheating and pluvial flooding. Planning applications should include a statement on climate change adaptation which summarises the measures that have been incorporated into the design and layout of the development to adapt to the effects of climate change (higher summer temperatures and greater frequency of extreme weather events). Statements should focus on overheating of public and private spaces, controlling surface water run-off and the creation of public and private green infrastructure and habitat networks (more details later in this guidance note).

Developments in areas at risk of flooding will also have to account for fluvial flooding, while developments within the critical drainage areas within Braintree or Witham will have to respond to additional Local Plan policies at LPP75.

MINIMUM STANDARD

- Expected internal water usage of 110 litres/person/day (residential)
- A site drainage strategy - provision of SuDS for 10 or more dwellings and 'major commercial development' as applicable
- Compliance with other Local Plan flood management policies as applicable (see local validation list)

Part L of the Buildings regulations was approved on the 15th June 2022, this standard requires that the average water usage for residential dwellings be no more than 110 litres per person per day.

- For residential developments, no additional information beyond the above is required to be submitted.
- For non-residential developments, a minimum standard of 1 credit wat 1 is required to meet BREEAM 'very good'. This is equivalent to a 12.5% improvement over baseline water consumption for the building according to type.

Guidance for EXCEEDING MINIMUM STANDARDS:

Suggested measures to exceed the minimum requirement:

Water efficiency:

- Use a whole life carbon approach
- Green Roofs
- Rainwater harvesting
- Dual potable and grey water recycling
- Installation of water saving devices e.g. Low flush toilets, smaller baths, taps and showers with flow regulators
- Installation of visible water meters or portable digital meters

Passive cooling measures:

- Siting and orientation of buildings
- Passive building design, natural ventilation and lighting
- Deciduous trees and vegetation for shading
- Reducing the heat island effect e.g. by using reflective materials for pavements and roofs
- Green Walls

- Provision planting scheme designed in response to heat map assessments

Reducing the effects of Pluvial and Fluvial flooding events:

- SuDS mimicking nature incorporating passive infiltration and attenuation
- Multifunctional SuDS incorporating open spaces or biodiversity
- Permeable surfaces
- Green Walls
- Green/blue Infrastructure enhancements beyond open space strategy standards

Assessment Questions

What is the expected internal water use (litres/person/day)? (residential)

Minimum = 110 lpd

Exceeded = 109 or less

Outstanding = 75 or less

What % percentage improvement over baseline building water consumption? (non-residential)

Minimum = 12.5% (BREEAM very good)

Exceeded = 25% or more

Outstanding = 65% or more (BREEAM Outstanding)

See Wat 01 Water consumption by BRE group for further details

What percentage of the hard surfaces within the development and conveyance systems will be permeable (streams, swales, amenity green space, open space, private gardens .etc)?

Minimum = less than 50%

Exceeded = 50-75%

Outstanding = 90% or more

What water collection or recycling measures will be used?

Minimum = None

Exceeded = Water Butts/Rainwater harvesting

Outstanding = Greywater recycling and rainwater harvesting

What water saving measures have been installed?

Minimum = None or some measures

Exceeded = all of low flush toilets, smaller baths, taps and showers with flow regulators

Outstanding = all of above and more

Green and Blue Infrastructure

Local Plan Policy

Policy LPP63: *'The Council will expect all development proposals, where appropriate, to contribute towards the delivery of **new Green Infrastructure** which develops and enhances a network of multi-functional spaces and natural features throughout the District. This will be **proportionate to the scale of the proposed development** and the rural or urban context. The Council will support and encourage development which contributes to the District's existing Green Infrastructure and where possible, enhances and protects networks and adds to their functions.'*

*'The District has a range of existing green and blue infrastructure assets which serve several different functions. Assets such as **open spaces, parks and gardens, allotments, woodlands, trees, fields, hedges, lakes, ponds, meadows and grassland, playing fields, footpaths, former railways, cycleways and waterways, ponds and lakes** all represent elements which can be considered as Green or Blue Infrastructure.'* (Para 6.6)

'The concept of Green Infrastructure encourages connecting such spaces and seeking opportunities to increase their function and connectivity to the benefit of the community and natural world.'

LPP52 Layout and design of development

*'i. Landscape proposals should consist of native plant species and their design shall promote and enhance local biodiversity and historic environmental assets. **Biodiversity net gain** in line with the requirements of national policy through the provision of new priority habitat where appropriate is encouraged. Development layouts must be appropriately designed to accommodate structural tree, hedge planting, and ensure that future interference with highway safety, roads, pavements, services and properties is minimised.'*

MINIMUM STANDARD

Green and blue infrastructure should be incorporated into the design and layout of the development to contribute towards climate change adaptation and habitat resilience. We suggest that it's used in conjunction with features which mitigate flood risk, such as by enhancing SuDS features, where possible.

- 10% Biodiversity Net Gain (in accordance with the Environment Act 2022)
- Provision of new on-site green/blue infrastructure e.g. public open space, private amenity space, gardens (Major development should submit a design and access statement)
- Major development should submit an adequate landscape impact assessment (as appropriate).

- Major developments should submit an Open Space statement which calculates in detail the quantity of SuDs, amenity green space, open space, play space, formal sport space and allotments.
- Long term (30+ years) management of any public open space and green/blue infrastructure. (Secured by S.106)

Suggested measures to exceed the minimum requirement:

- Link on-site assets to any off-site adjacent green/blue infrastructure.
- Provision of community land for food production.
- Enhance to multifunctional green infrastructure.
- Green/blue Infrastructure enhancements to SuDS solution (e.g. swales, ponds).
- Enhance proposals within the open space statement (which should meet the policy requirement of BDC open space strategy).
- 11 or more percent of on-site BNG (Biodiversity Net Gain) delivery.
- Reference the site with the context of Essex County Council's green infrastructure strategy

Assessment Questions

What % of Biodiversity Net Gain does the development achieve (include BNG credits)?

Minimum = 10%

Exceeded = 11 – 20%

Outstanding = 21% or more

Does the application include a contribution to the Green/Blue Infrastructure network?

Minimum = None

Exceed = Linked green/blue infrastructure supported by a long term management scheme

Outstanding= Significant areas of multifunctional green/blue infrastructure that also forms important links to the district's green/blue infrastructure network and is supported by a long term management scheme.

Sustainable Movement

Sustainable movement is about reducing the propensity for travel as well as prioritising travel using methods which have the lowest amount of carbon emissions. For local and regional journeys, the bottom of the hierarchy is travel by private vehicle however this has remained the most popular choice for residents undertaking trip of 1 mile and above for several decades, so the district must also prepare for accommodating the phasing out of ICE (internal combustion engines) by 2030 and a transition to either hybrid, electric or hydrogen powered vehicles. The policies of this chapter are broken down in 3 areas: Broadband, sustainable travel and electric vehicle charging.

Broadband Local Plan policy

*The Government is committed to **making gigabit-enabling connectivity available to all premises in the UK by 2025** and the Local Plan can contribute towards achieving this goal by requiring developers to ensure such technology is in place. (Section 1, para 6.23)*

SP6 Infrastructure and connectivity

D. Digital Connectivity

... All new properties will allow for the provision for ultrafast broadband in order to allow connection to that network as and when it is made available.

LPP46 Broadband

*All new residential and commercial developments must be served by a fast and reliable broadband connection to the premises. **Connection should include the installation of appropriate cabling within the homes or business units**, as well as a fully enabled connection of the developed areas to the full main telecommunications network, to provide capability for the fastest available broadband access.*

Sustainable travel Local Plan policy

LPP 42 Sustainable Transport

Priority should be given to cycle and pedestrian movements and access to public transport.

Development proposals should provide appropriate provision for all the following transport modes:

- Pedestrians (including disabled persons and those with impaired mobility), through safe, accessible, direct and convenient design and layout of routes within the new development and wider pedestrian network.*
- ...safe design and layout of routes integrated into the new development and contributing towards the development and enhancement of the cycle network and provision of secure cycle parking and where appropriate, changing and shower facilities.*
- Public transport, through measures that will improve and support public transport and provide new public transport routes*
- Community transport, through measures that will promote car pools, car sharing and voluntary community buses, community services and cycle schemes*

*The Local Plans seek to improve transport infrastructure to enable the efficient movement of people, goods and ensure that new development is accessible by sustainable forms of transport. **Measures designed to encourage people to make sustainable travel choices** such as better public transport provision, car clubs, electric vehicle charging points and provision of cycle links and foot ways will also be required to achieve such a change. (para 6.7)*

LPP52 Layout and design of development

k. *Use of sustainable modes of transport are promoted in the design and layout of new development.*

o. *Developments shall be permeable and well-connected to walking and cycling networks, open spaces and facilities*

*The **internal design of new developments should prioritise walking and cycling, as well as public transport**, over private vehicle movements, to ensure that they encourage shorter internal journeys to take place by these modes. **New developments will also be expected to connect safely and directly to the existing external footpath and cycle way routes in the local area**, and contributions will be sought as appropriate to improve connections from new developments to the main commuter, community and retail centres or recreational links. Public rights of way which are impacted upon by new development may require protection or enhancement to accommodate new users. (Para 4.141)*

- See also ECC's Essex Design Guide, Manual for Streets (the national guidance on street design).

Electric vehicle charging Local Plan Policy

Facilities for charging plug-in and other ultra-low emission vehicles will be provided at all new residential properties

Home Working

Feering Neighbourhood Plan BE1:

Develop and protect sustainable community employment in the Parish including the facilitation of flexible working.

Transport of people and goods produces nearly 50% of the district's carbon emissions therefore minimising the need to travel, improving sustainable or active travel access to local services, facilities and day-to-day needs will be key. At the scale of North Essex, identifying and building sustainable movement and active transport infrastructure is key to the success of sustainable growth in the district. At a local scale, development of major residential and all non-residential buildings can still play a role in well-connected walking and cycling networks.

Reduce the need to travel

Provision of fast and reliable broadband and space for home offices in non-residential dwellings will support working from home or hybrid working. Local Plan policies supports the provision of gigabit-enabled broadband connections to all new residential and non-residential premises which should be delivered by fibre to the premises (FTTP).

Prioritise walking and cycling

Local routes for everyday journeys to work, schools, and shopping should be identified, as should opportunities to knit communities together, rather than sever them.

Design and layouts of major developments play a significant role in embedding travel behaviour, for example by making sustainable travel a convenient, safe, secure and competitive choice compared to car use. This can mean, where appropriate, that active travel movement should be reprioritised to be more direct than car.

Priority should be given to pedestrian and cycle networks that link to wider sustainable transport networks – most likely rail or bus hubs at the centre of our towns and villages which provide rapid links to regional employment centres within and outside of the district. Strong transport links can tie-in with existing and historic pathways identified through a fine-grain analysis.

Decarbonising private vehicles

The government is committed to phasing out the sale of standard internal combustion engines (ICE) by 2030, such that hydrogen, electric or hybrid powered new vehicles will become the most popular. The Local Plan will support this transition by building up the electric vehicle charging infrastructure in the district.

MINIMUM STANDARD

- Provision of FTTP Broadband (all residential and non-residential) or ducting for future installation (under 30 dwellings)
- Transport Assessment (as appropriate)
- Permeable developments (including potential urban or village extensions)
- Siting and layout that prioritises safe and secure walking and cycling.
- Electric vehicle charging points
- Connection to green/blue infrastructure

Suggested measures to exceed the minimum requirement:

- Spaces or offices for home working
- Accommodate pedestrian and cycling desire lines?

- Is the location, form and scale of development appropriate to the level of sustainable travel alternatives?
-
- connectivity through movement corridors

Assessment Questions

What is the level of broadband services provision?

Minimum = FTTP to premises unless under 30 dwellings.

Exceed = FTTP or suitable ducting for retrofit if under 30 dwellings.

Outstanding = FTTP and a choice of broadband providers

Movement Hierarchy 1. Is walking and cycling, as well as public transport, prioritised over private vehicle movements as a design principle?

Minimum = walking and cycling is safe and accessible

Exceed = walking and cycling to local facilities is direct and convenient.

Outstanding = contributes to the development and enhancement of the cycle network on- or off-site.

For non-residential developments, is there space for cycle parking, changing and shower facilities?

Minimum = provision of cycle parking

Exceed = provision of cycle parking, changing and shower facilities

Outstanding = same as above

Movement Hierarchy 2: Does the development offer a choice of public transport to district and regional employment hubs (typically 5 miles or more)?

Minimum = none

Exceed = within 400m of bus stop with minimum of hourly weekday services and/or 800m of a rail station

Outstanding = within 400m of bus stop with 30 minute or better weekday services and/or within 800m of a mainline rail station.

Movement Hierarchy 3: Does the development provide electric vehicle charging points?

Minimum = Adaptable electrical points for residential dwellings with driveways or garages.

Exceed = Installation of full charging facilities at all residential dwellings and at least 20% of parking spaces for flats.

Outstanding = Charging points provided at all residential dwellings, 50% of parking spaces for non-residential.

Information to be provided in a Sustainability Statement

Data normally gathered and submitted to accompany a planning application can be used to contribute to the preparation of a sustainability statement is listed below. There may be some new burdens on the developer to provide information on a) energy efficiency measures such as insulation, u-values, heating systems, hot water generation and ventilation systems and b) embedded carbon such as construction details and material sources at an earlier stage. In these cases, we could take a practical view to resolving these details through reserved matters however to ensure that the energy efficiency hierarchy is followed as much as possible, applicants are encouraged to supply this data early in the application process.

1. Floorplans
2. Elevations
3. Site plan
4. Insulation
5. Sections
6. U-values
7. Heating systems
8. Hot water generation
9. Renewable technologies (if any)
10. Low energy lighting
11. Ventilation systems
12. Surface water drainage strategy (if applicable)
13. Construction details
14. Material sources (material origins)
15. Any wildlife and plants in the surrounding area

Summary of minimum standards



Energy Efficiency

- For residential developments of 1 or more new dwellings: Buildings regulations Part L applies.
- Schemes are encouraged to exceed 19% above Buildings Regulations 2013; to achieve higher standards of operational energy needs.
- For non-residential developments of 501sqm or more: Does the scheme achieve BREEAM 'very good' or better?



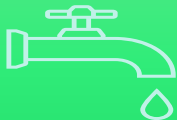
Renewable Energy Production and low-carbon heat generation

- For all new residential developments of 1 or more and all new non-residential developments of 501sqm or more, renewable and low carbon energy generation is encouraged.
- Renewable Energy installation should be summarised by type along with expected power output/savings throughout the year.



Climate Change Adaptation

- All new development is encouraged to reduce overheating.
- Use of SuDS schemes (as relevant).
- Respond to strategic flood risk (as relevant).



Water Efficiency

- For residential developments of 1 or more new dwellings: Buildings regulations.
- Schemes are encouraged to exceed water efficiency of 110l/pd.
- For non-residential developments of 501sqm or more: Does the scheme achieve 1 credit for BREEAM 'very good' or better?



Green/Blue Infrastructure

- Minimum 10% biodiversity net gain
- Schemes are encouraged to provide significant areas of multifunctional green/blue infrastructure that also forms important links to the district's green/blue infrastructure network and is supported by a long term management scheme.



Sustainable Travel

- Access to a choice of sustainable travel options
- Links to the walking/cycling/horseriding network
- Plug-in EV chargers
- Broadband

Appendix A: Sustainability Statement Checklist

Purpose: ensure the Sustainability Statement contains the information required for assessment

Assessment questions will be collated into a final table for the publication version.

Equality Impact Assessment

Basic



This basic impact assessment is an initial screening process to help identify if a full Equality Impact Assessment is required and, if it isn't, to record the reasons why.

It considers positive, negative or no impact on each of the 9 protected characteristics in relation to addressing the 3 aims of the Equality Duty that we as a public body must give due regard to;

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Directorate

Sustainable Development

Service

Planning Policy

Title of policy, strategy, project or service

Sustainability Statement guidance note

Is the policy, strategy, project or service;

Existing

☐

New/proposed

☒

Changed/Reviewed

☐

Q 1. Aim of the policy, strategy, project or service

Provide secondary guidance on local plan policies for sustainability statements
e.g. energy efficiency and climate change adaptation.

Q 2. Who is this policy, strategy, project or service going to benefit or have a detrimental impact on & how?

This policy seeks to reduce carbon emissions so a benefit will be accrued by everyone. Sustainability statement production and implementation of policies could have a detrimental impact on application costs and development viability.

Q3. Is this policy, strategy, project or service aimed at one of the protected characteristics?
If so, what justification is there for this?

No

Q 4. Thinking about each of the protected characteristics does or could the policy, strategy, project or service have a negative or positive impact?

Group	Negative	Positive/ No impact	Unclear
Age	ÿ	×	ÿ
Disability	ÿ	×	ÿ
Gender reassignment	ÿ	×	ÿ
Marriage & civil partnership (only in respect of eliminating unlawful discrimination).	ÿ	×	ÿ
Pregnancy & maternity	ÿ	×	ÿ
Race	ÿ	×	ÿ
Religion or belief	ÿ	×	ÿ
Sex	ÿ	×	ÿ
Sexual orientation	ÿ	×	ÿ

If the answer for any group is 'negative' or 'unclear' do a full EIA

Q5. Thinking about each of the protected characteristics does or could the policy, strategy, project or service help to support the 3 aims of the Equality Duty?

Group	Yes	No	Unclear
Age	ÿ	ÿ	×
Disability	×	ÿ	ÿ
Gender reassignment	ÿ	ÿ	×
Marriage & civil partnership (only in respect of eliminating unlawful discrimination).	ÿ	ÿ	×
Pregnancy & maternity	ÿ	ÿ	×
Race	ÿ	ÿ	×
Religion or belief	ÿ	ÿ	×
Sex	ÿ	ÿ	×
Sexual orientation	ÿ	ÿ	×

If the answer for any group is 'no' do a full EIA

Q 6. What evidence has been used (e.g. data, feedback, consultation & engagement, surveys) that may influence the policy, strategy, project or service?

Group	Evidence
Age	
Disability	
Gender reassignment	
Pregnancy & maternity	
Race	
Religion or belief	
Sex	
Sexual orientation	

Q 7. Using the responses to questions 4 & 5 should a full EIA be carried out on this policy, strategy, project or service?

Yes

☐

No

☒

Provide your reasons for your response showing how you have considered due regard

The policy provides guidance on prioritising walking and cycling, then public transport, which is expected to also improve the environment by eliminating existing prejudices for people with various physical disabilities.

For most other groups, there no expected effects from the proposed policy.

Completed by (Print name):

Gary Sung

Signature :

GS

Approved by Head of Service (print name):

Signature :

Date:

30/03/2023

Report Title: To agree a response to Anglian Water's public consultation on its Draft Water Resources Management Plan 2024	
Report to: Local Plan Sub-Committee	
Date: 30th March 2023	For: To note
Key Decision: No	Decision Planner Ref No: N/A
Report Presented by: Julie O'Hara	
Enquiries to: Julie O'Hara 01376 552525 Ext. 2559 julie.ohara@braintree.gov.uk	

1. Purpose of the Report

- 1.1 Anglian Water has consulted Braintree District Council on the contents of their draft Water Resources Management Plan 2024. The purpose of this report is to agree a response to this consultation. The Main Report is accompanied by a suite of documents which are listed in the background documents.

2. Recommendations

- 2.1 The officer responses set out below are noted and sent to Anglian Water in response to their consultation.
- 2.2 The Council supports planned improvement to the Water Infrastructure and increases to its capacity. This will underpin future growth within the district. This is a high level plan and much detail remains to be worked out, particularly in relation to longer term projects. The Council remains interested in being involved in future consultations. The Council supports the consideration given to environmental protections built into the plan both in terms of biodiversity net gain and in planning for carbon reduction and climate change.
- 2.3 The Draft Environment Report Appendix C: Policies, Plans and Program Review refers to Braintree District Council Policies from a version of the plan prior to adoption. These should be updated to refer to:
- LPP47 Built and Historic Environment
 - LPP 70 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards
 - LPP71 Climate Change
 - LPP72 Resource Efficiency, Energy Generation and Energy Efficiency
 - LPP74 Flooding Risk and Surface Water Drainage
 - LPP75 Surface Water Management Plan
 - LPP76 Sustainable Urban Drainage Systems

- 2.4 The questions asked in the WRMP Consultation Questions are set out below in bold, with responses under each question.
- 2.5 **Do you support us placing reservoirs at the heart of our draft WRMP24, rather than prioritising other supply-side options such as water reuse and desalination? Please tell us why you think of this.**
- 2.6 Reservoirs are supported in principle subject to the usual planning considerations as visual impact, impact on neighbouring properties, access etc and are a means of supplying water which can support multiple benefits such as leisure, tourism. sports and provide habitat for biodiversity.
- 2.7 **We believe we will achieve a best value plan by undertaking a prioritised, three-tiered approach: demand management, two new reservoirs and other options such as water reuse and desalination to solve any remaining deficits. Do you support this approach? Can you explain why you do, or why you don't?**
- 2.8 This approach is satisfactory. Water recycling and desalination will require more energy on an ongoing basis, and it is not clear that they provide as many benefits as the reservoirs.
- 2.9 The Council has supported water demand management in its 2033 Braintree Local Plan through the requirement on developers to adhere to the 110litres per person per day Building Control standard for new housing. Other measures are supported in principal but if located within Braintree District, full support would depend on the details of any scheme, including siting.
- 2.10 **We are committed to protecting and improving our environment but don't believe this should be achieved by implementing quick fix solutions, such as desalination, that could end up being detrimental to the environment and more expensive for our customers. Instead, we will develop options such as the Fens and South Lincolnshire reservoirs that may have longer lead times but will provide more environmental benefits in the long term. This means we will have a phased approach to reducing our abstraction in the short term, and will ensure no deterioration to the environment by furthering our already industry leading demand management strategy and implementing short term supply-side options such as transfers. Do you agree with this approach?**
- 2.11 This approach is satisfactory.
- 2.12 **Do you support us implementing compulsory metering? Is there any other additional support we could provide to our customers when they start to pay according to the amount of water they use?**
- 2.13 No comment

3. Summary of Issues

- 3.1 Anglian Water supplies potable water to Braintree District together with Essex and Suffolk Water which supplies Witham, Silver End and Rivenhall. This report relates to the Anglian water area only.
- 3.2 Water companies have a statutory duty to undertake a water resources plan to deliver a sustainable drinking water supply within its area to meet existing and future demand. This is reported through the Water Resource Management Plans (WRMP) which covers 25 years but is reviewed 5 yearly. This plan covers the period from Plan covers the period from 2029 to 2050.
- 3.3 The Part 1, 2033 Braintree Local Plan Policy SP6 states that the authority will work with Anglian Water and other bodies to ensure there is sufficient capacity in the water supply to serve new development. Part 2 Policy LPP78 Infrastructure Delivery and Impact Mitigation requires that "Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal". The Water Resource Management Plan plans for the delivery of that infrastructure. The Braintree District Local Plan supports conservation of water resources though LPP72 Resource Efficiency, Energy Generation and Energy Efficiency, by requiring that "All new dwellings shall meet the Building Regulations optional requirement for water efficiency of 110 litres/person/day".
- 3.4 The Water Resource Management Plan forecasts deployable water supply and the scale of likely demand, thereby establishing a surplus or deficit (baseline supply- demand). It looks at supply and demand management options, environmental assessment of these options, risk factors, and adaptability to changing circumstances. Built into these considerations are an increase of 10% biodiversity and the company's net zero strategy. It has conducted customer/stakeholder consultation as part of its process so far. It has taken into account the need to be adaptable to future changes and recognises that trade-offs between different objectives are likely to be needed. Following consideration of the various factors, a Best Value Plan is proposed. Anglian Water may be required to include some actions as indicated by the Water Industry National Environment Programme (WINEP) plan when that is made available (programmed for March 31st)
- 3.5 There are a number of issues affecting water supply. Regulation will mean that less water (85 million litres per day [Ml/d] by 25/26) will be permitted to be taken from the environment. This, however, will ensure the sustainability of ground sources and protection of the quality of the environment including rivers and particularly sensitive habitats such as chalk streams.

- 3.6 Leak reduction for 24/25 is projected to be 162.3MI/day falling to 145.7MI/day by 2050, a fall of 23.8% from 2017/18. As leaks become smaller, they become increasingly expensive and difficult to detect so new acoustic technology and infra-red equipped drones will be deployed.
- 3.7 The plan proposes improved drought resilience, from a 1 in 200 year event, to a 1 in 500. This will reduce drinking water supply by keeping more water in the environment but can be called on to support maintenance of supplies for longer during drier periods without resorting to emergency measures.
- 3.8 Demand for water is expected to rise as the population forecast by Anglian Water is expected to rise across its area by 891,000 by 2050, requiring an additional 117MI/d. Also, as the pandemic has subsided, water demand has remained 2.5% higher than previous levels.
- 3.9 Demand management options suggested include continued installation of smart meters and consideration of compulsory metering. Smart meters are said to lead to a long-term reduction of 2%. It suggests that the Company could install other water saving devices such as smart shower devices, devise more complex tariffs and reward schemes to encourage reduced demand. Smart meters can also be used to detect leakages within private property about which Anglian Water can inform customers.
- 3.10 New supply includes two reservoirs. The Fens, and South Lincolnshire reservoirs originally proposed in the 2019 remain in the long-term plan and are being progressed through a fast regulatory process. These will be sited to take from rivers with surplus water (total 253MI/d) and will provide 43% of the water needed for a supply/demand balance. This will compensate for the proposed reduced ground water abstraction.
- 3.11 Use of Water Reuse from existing Waste Water Recycling Centres is being examined, and this treated water would ideally be stored in a reservoir.
- 3.12 Seawater desalination is also required as there are no adequate alternative resources. It can be scaled up or down according to need and gives flexibility to fit with the circumstances.
- 3.13 Other supply possibilities include further water transfers and additional pipe routes have been identified.
- 3.14 Many proposals put forward in the plan would not require planning permission, either not being development, being permitted development, or covered by the Building Regulations. The plan does require the optional building control plumbing standard of 110 litres per person per day and this supports the drive to reduce water consumption. The proposed reservoirs and desalination plant fall under the Nationally Significant Infrastructure Project process and are

located in Lincolnshire and Norfolk. (Nationally Significant Infrastructure Projects submissions for both reservoirs are expected in 2025).

- 3.15 Braintree District lies in the Essex South Water Resource Zone. The technical summary for this area indicates that Essex will benefit from improvements in the grid connectivity which will allow water transfers. The area is vulnerable to extreme drought and reductions in abstractions could increase deficits without mitigation. Options available for this area, as well as the previously mentioned strategic transfers, include desalination and water. The summary of this area is given in terms of housing and population growth, but these figures do not directly correspond with Braintree's area and include figures from Colchester. The method of calculation may also differ.
- 3.16 The recommendations set out in this report will help the Council to deliver the following Corporate Objectives:
- A sustainable environment and a great place to live, work and play;
 - A well connected and growing district with high quality homes and infrastructure;
 - A prosperous district that attracts business growth and provides high quality employment opportunities;
 - Residents live well in healthy and resilient communities where residents feel supported;
- 3.17 The Council supports provision of infrastructure which will deliver its corporate objectives.

4. Consultation

- 4.1 The Council has not undertaken consultation on this proposal as this is a Anglian Water consultation.

5. Options

- 5.1 That Members note the response to be submitted as set out in the report, as it is important that the Local Authority indicates its interest in the future development of the water infrastructure.
- 5.2 No response be sent. Issuing a response is not compulsory for the Local Authority, however failure to do so might suggest a lack of interest.

6. Next Steps

- 6.1 If a response is to be issued it will be sent electronically to Anglian Water.

7. Financial Implications

- 7.1 There are no financial implications.

8. Legal Implications

- 8.1 There is no legal requirement for the Local Authority to respond to the consultation.

9. Equality and Diversity Implications

- 9.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:

- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
- (b) Advance equality of opportunity between people who share a protected characteristic and those who do not
- (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

- 9.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

- 9.3 The Equality Impact Assessment indicates that the proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic.

10. List of Appendices

- 10.1 The Anglian Water Resource Management Plan Dec 22

11. Background Papers

The 2033 Braintree Local Plan

The documents listed below are available at;

<https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/>

Draft Water Resources Management Plan 24 – Non-Technical Summary (Dec 2022)
Draft Water Resources Management Plan 24 – Consultation Questions
Supporting Technical Documents
Supply Forecasts
Sustainable abstraction and Environment
Demand Forecast
Demand Management Options Appraisal
Demand Management Preferred Plan

Supply side options development
Decision making
Planning factors
Customer and Stakeholder engagement
Independent Strategic Environmental Assessments
Main Environmental Report
Sub report A: Habitat Regulation Assessment
Sub report A: HRA Appendix C
Sub Report B: Water Framework Directive Assessment
Sub Report B: WFD Appendix A
Sub Report B: WFD Appendix B
Sub Report C: Bio Diversity Net Gain and Natural Capital Assessments
Sub Report C: BNG and NCA Appendix B
Sub Report D: INNS Report Assessment
Sub Report D: Appendix B
Appendix A: Environmental Assessment Option Summaries – Best Value
Appendix B: Scoping Report Consultation Log
Appendix C: Plans and Policies Review
Appendix D: Baseline Review and Baseline Maps
Appendix E: SEA Option Assessments (Part 1)
Appendix E: SEA Option Assessments (Part 2)
Appendix E: SEA Option Assessments (Part 3)
Draft WRMP24 Board Assurance Statement

Report Title: Anglian Water Storm Overflow Consultation	
Report to: Local Plan Sub-Committee	
Date: 30th March 2023	For: To Note
Key Decision: No	Decision Planner Ref No: N/A
Report Presented by Julie O'Hara	
Enquiries to: Julie O'Hara 01376 552525 Ext. 2559 julie.ohara@braintree.gov.uk	

1. Purpose of the Report

- 1.1 Anglian Water have consulted Braintree District Council on their Storm Overflow Consultation Report Feb 2023. The consultation period has run from 6th February 2023 to 27th February and extended to 3rd March. The report is a standalone part of Anglian Water's Waste Water Management Plan which was the subject of consultation in 2020. This Committee item seeks to inform the Sub-Committee of some background to this report, its contents and of the officer's response.

2. Recommendations

- 2.1 That the following response to Anglian Water be noted as set out below:

1. How confident are you that the storm overflow plan sufficiently meets statutory guidance?

The Council welcomes a strategy and measures to improve the water infrastructure and reduce pollution. Adherence to the targets and advice set by DEFRA and the Environment Agency, as a minimum are supported. It is for the statutory Authorities to assess the more technical details on how far the plan meets statutory guidance.

2. We will focus first on overflows in high priority areas as outlined in the SODRP guidance. Do you have any preference on which high priority areas should be met first? For example, bathing waters, rivers, high amenity use.

High priority should be given to rivers and bathing waters. Rivers should be a priority as they are also used for wild swimming and other recreational activities and can feed lakes which are or can be used for such activities. Higher water quality standards are likely to improve public health for those using rivers for recreation across wide area as benefiting biodiversity. abstracted downstream.

3. Nature based solutions might take longer to implement and are higher risk, but provide wider benefits and allow partnership working opportunities. Do you think nature based solutions should be

prioritised?

It is preferable that more serious problems are resolved first and that nature based solutions are developed in tandem where less acute.

4. How can your organisation support working with us to meet these targets?

The organisation can support through participating in consultation and workshops particularly on developing future local plan strategy. There may be scope for supporting a collaborative approach on nature based solutions where opportunities arise.

5. How confident are you that this strategy aligns with our Purpose?

Braintree District will be guided by the OFWAT, DEFRA and the Environment Agency.

3. Summary of Issues

- 3.1 The Part 1 2033 Braintree Local Plan Policy SP6 states that the Authority will work with Anglian Water and other bodies to ensure there is sufficient capacity in the water supply and waste water infrastructure to serve new development. Part 2 Policy LPP70 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding, seeks to prevent development which would contribute to unacceptable impacts on surface and ground waters. The Braintree District Water Cycle Study supports local plan policy, setting out that there is sufficient drinking water and wastewater provision to support growth within the plan period. The work outlined here in the Anglian Water Storm Overflow Report will improve and support wastewater infrastructure provision for the future.
- 3.2 The Water Services Regulatory Authority (OFWAT) is the body responsible for regulating the privatised water and sewerage industry. In March 2022 it wrote to Wastewater companies in England, asking them to set out how they were going to act to start tackling storm overflow and improve river quality as a priority. In June 2022 OFWAT responded to the wastewater company river water quality action plans submitted in response to the letter. Further to this, DEFRA set out water company targets in its Storm Overflow Discharge Reduction Plan (SODRP) Aug 2022 and the Environment Agency issued guidance on how water companies were to achieve the SODRP targets. This report represents Anglian Water's response to the above requirements.
- 3.3 OFWAT's response showed that Anglian Water had an average of 25 spills per storm overflow in 2020. This was the third lowest number for the 9 English Water companies. The total spill duration (in hours) of 170, 547 (2020) was the shortest spill duration out of these 9 water companies. The average duration per spill for Anglian Water was 10 hours. This is the joint

second highest average duration of the 9 water companies.

3.4 The plan outlines expected costs of meeting the Storm Overflow Discharge Reduction Plan targets within the timelines expected and all 1552 outflows were included in the review. Spending of £361 million by 2035 and £890 million is anticipated at present (improvements only). While some were earmarked for early investment – there is a commitment to deliver 10 schemes by 2025 – some 410 require further investigation. It is proposed to fit Event Duration Monitors (EDM) and let these run for a period of time to gather data to be assessed later. As part of the assessment, extra storage will be included to account for climate change. Outflows where no investment is needed at present will be monitored and action taken if it becomes necessary.

3.5 The plan indicates the following aims:

- 10 improvement schemes by 2025
- eliminating all serious pollutions by 2025
- reducing less serious pollutions by 45%
- reducing spills from storm overflows to an average of 20 per year by 2025.

3.6 The Technical part of the report describes the screening and prioritisation process in detail and includes a spreadsheet showing Storm overflows and how they relate to trigger points related to the PR24 WINEP guidance and describes the analysis process in some detail. An extract of those relating to Braintree District has been included as Appendix 1 which includes the most relevant information. This analysis shows 50 outflow sites, most of which are under investigation, with 9 EDM devices having been commissioned in 2019 and 15 EDM in 2020. A full year of data from them is expected. A further 3 were commissioned in March 2021 and 29 EDMs are to be installed by December 2023. 14 outflows have completed their investigatory period with a further 4 having completed over 90% of this period.

3.7 High priority sites were established using the following information

1. They met one or more of the trigger points as set out by the Environment Agency prioritisation criteria (as specified within the PR24 WINEP Driver Guidance) and the factors outlined by our stakeholders.
2. Had spill data available, provided either by modelled data, EDM data, or both
3. Had spill data which indicated that the CSO spills >10 times on average per annum, or >2 times per bathing water season at bathing water
4. Had been assessed for screening control and/or whether this met the screening requirements set out by the aesthetic impact control guidance.

High priorities were predominately shaped by points 1 and 3 and considering

stakeholder average weightings as to what they considered important. Those which would not meet the new spill frequency targets were put at the top of the list. Some were allocated for further investigation, and some given a target time period. Further consideration was given to cost, expected growth, climate change and screening.

- 3.8 Braintree District has 50 pieces of storm apparatus, and most are being investigated for possible upgrades. Following analysis of the data received from investigation decisions will be made as to any improvements required, and if improvements are needed, a target time period will be set.
- 3.9 The recommendations set out in this report will help the Council to deliver the following Corporate Objectives:
- A sustainable environment and a great place to live, work and play;
 - A well connected and growing district with high quality homes and infrastructure;
 - A prosperous district that attracts business growth and provides high quality employment opportunities;
 - Residents live well in healthy and resilient communities where residents feel supported.
- 3.10 Storm overflows and associated equipment provide a safety mechanism which prevents untreated wastewater entering watercourses until they are overloaded. The consequent harm to water quality erodes river quality making thus harming long term sustainability of the environment, infrastructure quality which in turn will impact prosperity and result in less healthy resilient communities. This report sets out actions which will monitor and improve water infrastructure for the future.

4. Consultation

- 4.1 This report has not been subject to public consultation by Braintree District Council.

5. Options

- 5.1 To note the response as set out in the recommendation.
- 5.2 To alter the response and send this to Anglian Water though this may be too late to be accepted.

6. Next Steps

- 6.1 If the proposal were to be altered a response would be prepared and sent to Anglian Water.

7. Financial Implications

7.1 There are no financial implications for Braintree District Council.

8. Legal Implications

8.1 There is no legal requirement for Braintree District to respond to this consultation.

10. Other Implications

10.1 This consultation provides the opportunity to express support for infrastructure improvements.

11. Equality and Diversity Implications

11.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:

- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
- (b) Advance equality of opportunity between people who share a protected characteristic and those who do not
- (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

11.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

11.3 The Equality Impact Assessment indicates that the proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic.

12. List of Appendices

- 12.1
- 1. Spreadsheet showing Braintree Storm Overflow Apparatus
 - 2. The DWMP Storm Overflow Consultation Feb 2023

13. Background Papers

2033 Braintree Local Plan

- 13.1 The Braintree District Council Water Cycle Study, March 2017
Ofwat response to wastewater company river water quality action plans
<https://www.ofwat.gov.uk/wp-content/uploads/2022/06/Response-to-wastewater-company-river-water-quality-action-plans-230622.pdf>

Ofwat letter to Water companies dated 1st March 2022.

<https://www.ofwat.gov.uk/wp-content/uploads/2022/03/Letter-from-David-Black-to-CEOs-on-Environment-Act-duties.pdf>

Ofwat response to wastewater company river water quality action plans

<https://www.ofwat.gov.uk/wp-content/uploads/2022/06/Response-to-wastewater-company-river-water-quality-action-plans-230622.pdf>

APPENDIX 1. Storm Overflow Facilities in Braintree District with Anglin Water Analysis

Site Name (WaSC operational) [optional]	Storm Discharge Asset Type	Initial Event Duration Monitors (EDM) Commission Date	EDM Operation - % of reporting period EDM operational
BOCKING-BRADFORD BRG (NEW) TPS	Storm discharge at pumping station	Commissioned in 2020 - full year data expected	99.99%
BOCKING-BRADFORD STREET SSO	SO on sewer network	EDM to be installed by Dec 2023	
BOCKING-STW	Storm tank at WwTW	EDM to be installed by Dec 2023	
BRAINTREE STW	Storm tank at WwTW	Mar 2021	81.42%
BRAINTREE STW	Inlet SO at WwTW	EDM to be installed by Dec 2023	
BRAINTREE WEST- CLAPBRIDGE SO	SO on sewer network	EDM to be installed by Dec 2023	
BRAINTREE WEST-NOTLEY RD	SO on sewer network	EDM to be installed by Dec 2023	
BRAINTREE, ROSE HILL SSO M/H 4604	SO on sewer network	EDM to be installed by Dec 2023	
BRAINTREE-BOCKING CHURCH ST OV	SO on sewer network	EDM to be installed by Dec 2023	
BRAINTREE-HIGH GARRETT	SO on sewer network	EDM to be installed by Dec 2023	
BRAINTREE-HOPPIT BRIDGE	SO on sewer network	EDM to be installed by Dec 2023	
BRAINTREE-LONDON ROAD	SO on sewer network	EDM to be installed by Dec 2023	
BRAINTREE-NOTLEY RD SP	Storm discharge at pumping station	EDM to be installed by Dec 2023	
BRAINTREE-NOTLEY ROAD	SO on sewer network	EDM to be installed by Dec 2023	
BRAINTREE-ROSE HILL SP	Storm discharge at pumping station	EDM to be installed by Dec 2023	
BURES HAMLET-SPS	Storm discharge at pumping station	EDM to be installed by Dec 2023	
COGGESHALL STW	Storm tank at WwTW	Mar 2021	100.00%
COGGESHALL, EAST STREET SSO	SO on sewer network	EDM to be installed by Dec 2023	
COGGESHALL, ROBINSBRIDGE ROAD SSO	SO on sewer network	EDM to be installed by Dec 2023	
COGGESHALL-EAST ST R O #18 OV	SO on sewer network	Commissioned in 2019 - full year data expected	94.52%
EARLS COLNE STW	Storm tank at WwTW	EDM to be installed by Dec 2023	
EARLS COLNE UPPER HOLT ST CSO	SO on sewer network	Commissioned in 2020 - full year data expected	100.00%
EARLS COLNE-COLCHESTER RD TPS	Storm discharge at pumping station	Commissioned in 2020 - full year data expected	99.73%
EARLS COLNE-ST.ANDREWS CH SSO	SO on sewer network	Commissioned in 2020 - full year data expected	99.90%
FELSTEAD-STW	Storm tank at WwTW	Commissioned in 2020 - full year data expected	100.00%

Site Name (WaSC operational) [optional]	Storm Discharge Asset Type	Initial Event Duration Monitors (EDM) Commission Date	EDM Operation - % of reporting period EDM operational
GOSFIELD STW	Storm tank at WwTW	Mar 2021	100.00%
GT YELDHAM-POOLE ST SM	SO on sewer network	Commissioned in 2020 - full year data expected	100.00%
HALSTEAD STW	Storm tank at WwTW	Commissioned in 2020 - full year data expected	100.00%
HALSTEAD-HIGH STREET SSO	SO on sewer network	EDM to be installed by Dec 2023	
HALSTEAD-PARKFIELDS SO	SO on sewer network	EDM to be installed by Dec 2023	
HALSTEAD-PARSONS BRIDGE NO 1	SO on sewer network	EDM to be installed by Dec 2023	
HALSTEAD-PARSONS BRIDGE NO 2	SO on sewer network	EDM to be installed by Dec 2023	
HATFIELD PEVEREL-CRABBS HL SM	Storm discharge at pumping station	Commissioned in 2019 - full year data expected	40.32%
KELVEDON-EASTERFORD RD SO	SO on sewer network	EDM to be installed by Dec 2023	
KELVEDON-GREYS MILL SO	SO on sewer network	EDM to be installed by Dec 2023	
KELVEDON-STATION RD SO	SO on sewer network	EDM to be installed by Dec 2023	
RAYNE STW	Storm tank at WwTW	EDM to be installed by December 2023	
RAYNE-TPS	Storm discharge at pumping station	Commissioned in 2020 - full year data expected	100.00%
SIBLE HEDINGHAM STW	Storm tank at WwTW	EDM to be installed by Dec 2023	
SIBLE HEDINGHAM-ALDEFORD ST	SO on sewer network	Commissioned in 2019 - full year data expected	99.98%
STEEPLE BUMPSTEAD BLOIS RD TPS	Storm discharge at pumping station	Commissioned in 2020 - full year data expected	100.00%
STEEPLE BUMPSTEAD - SPS 1- 4	Storm discharge at pumping station		#N/A
STURMER KEDINGTON RD TPS	Storm discharge at pumping station	Commissioned in 2020 - full year data expected	100.00%
STEEPLE BUMPSTEAD LILLEY TPS	Storm discharge at pumping station	Commissioned in 2020 - full year data expected	100.00%
STEEPLE BUMPSTEAD STW	Inlet SO at WwTW	Commissioned in 2020 - full year data expected	100.00%
STISTED STW	Storm tank at WwTW	EDM to be installed by Dec 2023	
TOPPESFIELD STW	Storm tank at WwTW	Commissioned in 2020 - full year data expected	100.00%
WETHERSFIELD STW	Storm tank at WwTW	EDM to be installed by Dec 2023	
WHITE NOTLEY STW	Storm tank at WwTW	Commissioned in 2020 - full year data expected	100.00%
WITHAM STW	Storm tank at WwTW	Commissioned in 2020 - full year data expected	100.00%
WITHAM-MOAT CHASE SWS	SO on sewer network	EDM to be installed by Dec 2023	