

Local Plan Sub-Committee AGENDA



THE PUBLIC MAY ATTEND THIS MEETING

Please note this meeting will be webcast and audio recorded.

Date: Wednesday, 08 July 2015

Time: 18:00

**Venue: Council Chamber, Causeway House, Bocking End, Braintree, Essex
CM7 9HB**

Membership:

Councillor D Bebb

Councillor Mrs L Bowers-Flint (Chairman)

Councillor G Butland

Councillor T Cunningham

Councillor D Hume

Councillor Mrs J Money

Councillor Lady Newton

Councillor O'Reilly-Cicconi

Councillor Mrs W Scattergood

Councillor Miss M Thorogood

Members are requested to attend this meeting, to transact the following business:-

PUBLIC SESSION

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 11th June 2015 (copy previously circulated).

4 Public Question Time

(See paragraph below)

- | | | |
|-----------|--|----------------|
| 5 | Landscape Capacity Analysis | 4 - 19 |
| 6 | Sustainability Appraisal and Strategic Environmental Assessment Scoping Report - Representations | 20 - 55 |
| 7 | Essex County Council and Southend-on-Sea Replacement Waste Local Plan - Consultation | 56 - 75 |
| 8 | Statement on the Duty to Co-operate | 76 - 81 |
| 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. | |
| 10 | 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

- | | |
|-----------|--|
| 11 | 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. |
|-----------|--|

Continued

E WISBEY
Governance and Member Manager

Contact Details

If you require any further information please contact the Governance and Members Team on 01376 552525 or email demse@braintree.gov.uk

Public Question Time

Immediately after the Minutes of the previous meeting have been approved there will be a period of up to 30 minutes when members of the public can speak.

Members of the public wishing to speak should contact the Governance and Members Team on 01376 552525 or email demse@braintree.gov.uk at least 2 working days prior to the meeting.

Members of the public can remain to observe the whole of the public part of the meeting.

Health and Safety

Any persons attending meetings at Causeway House are requested to take a few moments to familiarise themselves with the nearest available fire exit, indicated by the fire evacuation signs. In the event of a continuous alarm sounding during the meeting, you must evacuate the building immediately and follow all instructions provided by a Council officer who will identify him/herself should the alarm sound. You will be assisted to the nearest designated assembly point until it is safe to return to the building.

Mobile Phones

Please ensure that your mobile phone is either switched to silent or switched off during the meeting.

Comments

Braintree District Council welcomes comments from members of the public in order to make its services as efficient and effective as possible. We would appreciate any suggestions regarding the usefulness of the paperwork for this meeting, or the conduct of the meeting you have attended.

Please let us have your comments setting out the following information

Meeting Attended..... Date of Meeting

Comment

.....
.....
.....
.....
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.....
.....

Contact Details:

Evidence Update: Braintree District Settlement Fringes Landscape Capacity Analysis		Agenda No: 5
<p>Corporate Priority: Securing appropriate infrastructure and housing growth</p> <p>Portfolio: Planning and Housing</p> <p>Report Presented by: Juliet Kirkaldy</p> <p>Report prepared by: Juliet Kirkaldy</p>		
<p>Background Papers:</p> <ul style="list-style-type: none"> • National Planning Policy Framework (NPPF) • National Planning Practice Guidance (NPPG) • Braintree District Council Landscape Character Assessment 2006 (Chris Blandford Associates) • Braintree District Settlement Fringes Landscape Capacity Analysis for Braintree and environs, Witham, Halstead, Silver End, Hatfield Peverel, Earls Colne, Coggeshall and Kelvedon 2007 (Chris Blandford Associates) 		Public Report: Yes
<p>Options: To approve/not approve the Landscape Capacity Analysis Evaluation reports, Landscape Capacity Analysis for Sible Hedingham and the updated Landscape Character Assessment as evidence base for the emerging Local Plan.</p>		Key Decision: No
<p>Executive Summary:</p> <p>The Council commissioned consultants in October 2014 to update the Landscape Character Assessment. The update included:</p> <ol style="list-style-type: none"> 1. Evaluating the Landscape Capacity Analysis for fringes of 8 key settlements (Braintree and surrounding area, Witham, Halstead, Silver End, Hatfield Peverel, Earls Colne, Coggeshall and Kelvedon), to provide a finer grain assessment of those areas identified as low – low/medium capacity to help determine which <i>parts</i> of these areas could absorb development with appropriate mitigation measures and minimal impact on the landscape. 2. Reviewing the Landscape Character Assessment 2008, to update and reflect changes that have occurred in the planning system since 2006. 3. To produce a Landscape Capacity Analysis for the settlement of Sible Hedingham to assess capacity and sensitivity as this was previously excluded from assessment in 2007. 4. To produce a user guide to assist developers and officers and the general public in using the Landscape Character Assessment and Landscape Capacity Analysis. <p>The Landscape Capacity Analysis evaluation was carried out by a team of Landscape Architects through a combination of desktop work and detailed field trips. The</p>		

Landscape Setting Areas (identified in the 2007 Landscape Capacity Analysis) were drilled down to create a finer sub division of landscape into 'parcels' with common characteristics. Characteristics that informed the identification of the parcels included: landform, landscape designations, hydrology, landscape scale, vegetation cover, land uses, pattern of settlement, presence of views and landmark features and communications. The parcels were assessed for their landscape sensitivity and capacity based on a pre-defined set of criteria (**see Appendix A**). The criteria were grouped into primary factors (representing features that are more important in the landscape, such as landform) and secondary factors (representing features that are of a more temporary or transient nature). In order to assess the overall landscape capacity of a parcel, 'landscape value' was added to the equation as follows:

'Overall landscape sensitivity + landscape value = overall landscape capacity'.

A general commentary has been provided for each parcel based on key characteristics and distinctive features. Parcels that have a Medium, Medium – High or High landscape capacity are considered to be the most likely to be suitable as a potential location for development.

This report asks that Members approve the Landscape Capacity Analysis evaluation reports, the Landscape Capacity Analysis for Sible Hedingham and the reviewed Landscape Character Assessment (2008) as evidence base for the emerging Local Plan.

Decision:

To approve the Landscape Capacity Analysis evaluation reports, the Landscape Capacity Analysis for Sible Hedingham and the reviewed/updated Landscape Character Assessment (2008) as evidence base for the emerging Local Plan.

Purpose of Decision:

To include the Landscape Capacity Analysis evaluation reports, the Landscape Capacity Analysis for Sible Hedingham and the reviewed/updated Landscape Character Assessment (2008) as evidence base for the emerging Local Plan.

Corporate implications

Financial:	The preparation of the Plans set out within the Local Development Scheme will be a significant cost which will be met through the Local Plan budget.
Legal:	To comply with Governments legislation and guidance.
Equalities/Diversity	The Councils policies should take account of equalities and diversity.
Safeguarding	None
Customer Impact:	There will be public consultation during various stages of the emerging Local Plan.
Environment and Climate Change:	This will form part of the evidence base for the emerging Local Plan and will inform policies and allocations.
Consultation/Community Engagement:	There will be public consultation during various stages of the emerging Local Plan.
Risks:	The Local Plan could be found unsound. Risk of High Court challenge.

Officer Contact:	Juliet Kirkaldy
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1. Background

1.1 In October 2005 Braintree District Council, Brentwood Borough Council, Chelmsford Borough Council, Maldon District Council and Uttlesford District Council jointly commissioned Chris Blandford Associates to undertake Landscape Character Assessments of their respective areas. The aim of the study was to provide a comprehensive Borough/District wide assessment of landscape character within the study area to inform land use planning and land management decisions.

1.2 In July 2007 Braintree District Council further commissioned Chris Blandford Associates to prepare a detailed Landscape Capacity Analysis (1:10,000 scale) for the fringes of eight key settlements to provide an evidence base for informing the preferred options stage of the Core Strategy for the Local Development Framework, by assessing sensitivity and capacity around settlements to accommodate development. The Landscape Capacity Analysis identified for most of these settlements low and low to medium capacity for development.

1.3 In October 2014 Braintree District Council commissioned The Landscape Partnership to provide an update to the Landscape Character Assessment by undertaking the following:

Evaluation of the Landscape Capacity Analysis

1.4 Produce an *evaluation* of the Landscape Capacity Analysis studies for the fringes of the eight key settlements, Braintree, Kelvedon, Witham, Halstead, Silver End, Earls Colne, Hatfield Peverel and Coggeshall. To provide a finer grain assessment of those areas identified as low – low/medium capacity to help determine which *parts* of these areas may be able to absorb development, with appropriate mitigation measures and minimal impact on the landscape.

Review and Update Landscape Character Assessment 2006

1.5 Since publication of the Landscape Character Assessment 2006 the planning system has undergone significant change, with the abolition of the Regional Spatial Strategy and the introduction of the National Planning Policy Framework. The Landscape Character Assessment should be reviewed and updated where necessary taking into account mineral site allocations, solar farms and possible future expansion of the AONB in north of the District. The Braintree Historic Environment Characterisation Study should also be taken into consideration.

To produce additional Landscape Capacity Analysis study for the settlement of Sible Hedingham

1.6 The previous Landscape Capacity Analysis (July 2007) only assessed the fringes of eight settlements, Braintree (*including Bocking Church Street, Rayne, Great Notley, Black Notley and Cressing*) Witham, Halstead, Silver End, Hatfield Peverel, Earls Colne, Coggeshall and Kelvedon. As part of this update, a Landscape Capacity Analysis is to be completed for the settlement of Sible Hedingham to assess capacity and sensitivity. Sible Hedingham is a key service village in the 2011 Core Strategy.

User Guide

1.7 Produce a user guide to assist developers, officers and the general public in using the Landscape Character Assessment and Landscape Capacity Analysis.

2. Approach and Methodology for undertaking Landscape Capacity Analysis evaluation

2.1 The existing Landscape Setting Areas (*identified during the Landscape Capacity Analysis 2007*) were 'drilled down' to create a finer sub division of the landscape into 'parcels' with common characteristics. Characteristics that informed the identification of the parcels included: landform, landscape designations, hydrology, landscape scale, and vegetation cover, land uses, pattern of settlement, presence of views and landmark features and communications. Such a fine grain study was required in order to identify those parts of the overall Landscape Setting Area that may have the potential to accommodate development.

2.2 The field survey work was carried out by a team of Landscape Architects who used a standard proforma to record data in a consistent manner. The parcels of land were also photographed. Following the field work and desk top assessment the parcels were reviewed, mapped and field survey notes written up to assess characteristics and features and to give an indication of 'strength of character' and 'condition' of each parcel.

2.3 The parcels were assessed for their landscape sensitivity and capacity based on a pre-defined set of criteria (**see Appendix A**).

2.4 The criteria were grouped into primary factors (representing features that are more important in the landscape, such as landform) and secondary factors (representing features that are of a more temporary or transient nature).

2.5 The following criteria have been selected to reflect existing landscape features:

- Slope analysis (primary)
- Vegetation enclosure (primary)
- The complexity and scale of the landscape (secondary)
- The condition of the landscape (secondary)

2.6 The following criteria have been selected to reflect visual sensitivity:
Relationship with existing urban conurbation (primary)

Safeguarding the separation or coalescence between settlements (primary)
Scope to mitigate the development (primary)
Openness to public view (secondary)
Openness to private view (secondary)

2.7 The overall Landscape Sensitivity provides an evaluation of the sensitivity of a parcel in broad strategic terms. In order to assess the Overall Landscape Capacity of a parcel, 'landscape value' was added to the equation as follows:

'Overall landscape sensitivity + landscape value = overall landscape capacity'.

2.8 A general commentary has been provided for each parcel based on key characteristics and distinctive features. Parcels that have a Medium, Medium – High or High landscape capacity are considered to be the most likely to be suitable as a potential location for development. Where appropriate, further detail regarding the type, nature and principles for development are described within each parcel to help provide guidance in identifying the most suitable locations and or layouts for future development.

Note: Some of the maps in **Appendix B** illustrate parcels of land which state, '*high/medium capacity not assessed*'. These were sites identified in the Chris Blandford Associates Landscape Capacity Analysis (2007) as having medium/high capacity to accommodate additional development. Therefore, it was not necessary to assess these parcels further due to its higher overall potential to accommodate development.

3 Evaluation of Landscape Capacity Analysis

3.1. These reports will form part of the evidence base for our emerging Local Plan. You can view the reports in their entirety on our website at the following link:

http://www.braintree.gov.uk/downloads/download/635/new_local_plan_evidence_base

Appendix B illustrates maps of Landscape Capacity for the settlements and identifies Low Capacity, Medium to Low Capacity, Medium Capacity, Medium to High Capacity and High Landscape Capacity.

3.2 It should be remembered that the Landscape Capacity is only one aspect of a sites suitability for development.

Recommendation

It is recommended that Members approve the Landscape Capacity Analysis evaluation reports, the Landscape Capacity Analysis for Sible Hedingham and the reviewed Landscape Character Assessment (2008) as evidence base for the emerging Local Plan.

Appendix A – Landscape Capacity Appraisal Form (Example)

Landscape capacity appraisal form

Parcel No.:

Settlement:

Landscape

Surveyor:

Date surveyed:

Parcel description

Strength of character/condition			
Strength of character	Weak	Moderate	Strong
S1/ Impact of landform	Insignificant	Apparent	Dominant/Prominent
S2/ Impact of landcover *	Insignificant	Apparent	Dominant/Prominent
S3/ Historic pattern *	Insignificant	Apparent	Dominant/Prominent
S4/ Tranquillity	Discordant	Moderate	Tranquil
S5/ Distinctiveness /rarity	Frequent	Unusual	Unique/rare
S6/ Visual unity	Incoherent	Coherent	Unified
Totals * Prime character if a tie			
Condition	Poor	Moderate	Good
C1/ Landcover change	Widespread	Localised	Insignificant
C2/ Age structure of tree cover *	Over mature	Mature or young	Mixed
C3/ Extent of semi-natural habitat survival *	Relic	Scattered	Widespread/linked
C4/ Management of semi-natural habitats	Poor	Not obvious	Good
C5/ Survival of cultural pattern (fields and hedges)	Declining/relic	Interrupted	Intact
C6/ Impact of development	High	Moderate	Low
Totals * Prime condition if a tie			

Strength of character/condition: (see matrix)

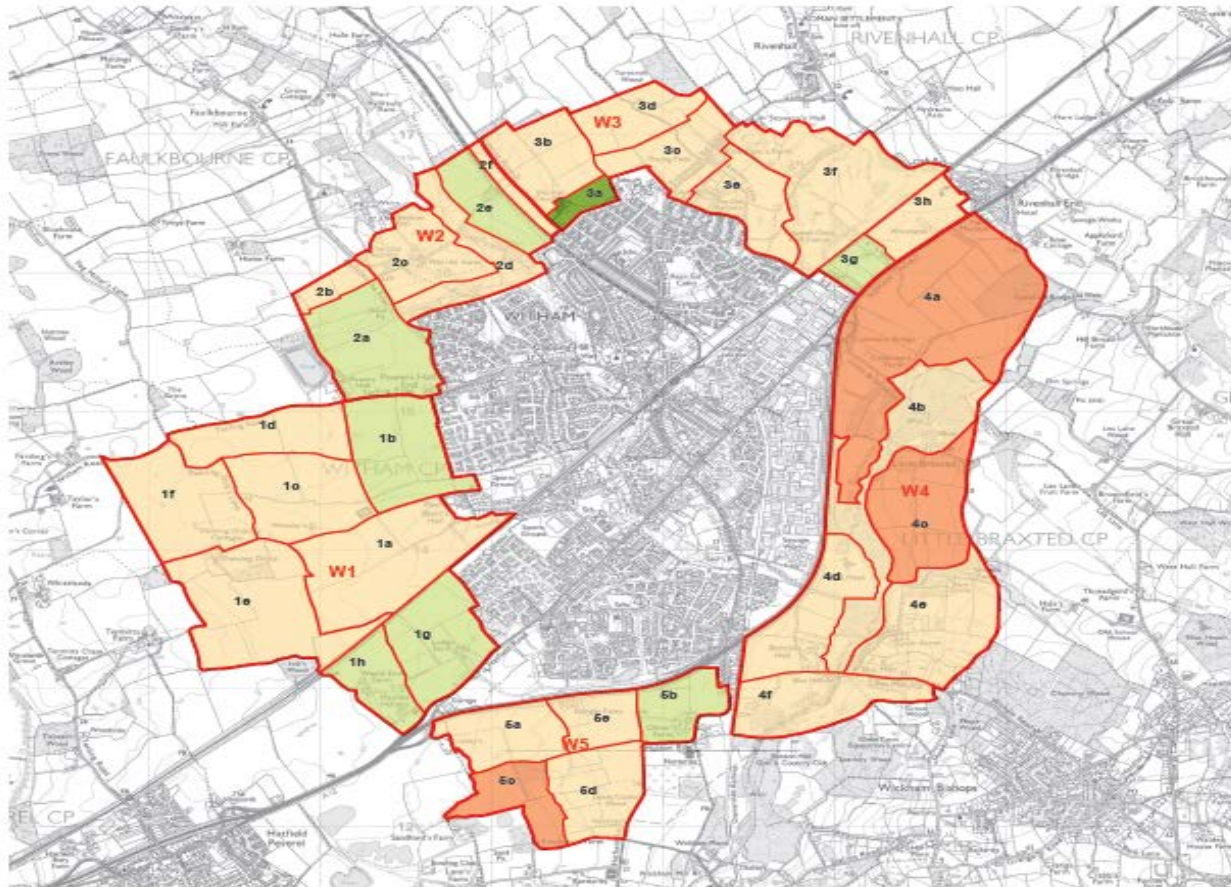
Capacity analysis							
Criteria	Importance	A=5	B=4	C=3	D=2	E=1	Total
1/ Landscape features							
Slope analysis	Primary						
Vegetation enclosure	Primary						
Complexity / scale	Secondary						
Condition	Secondary						
Sub total							
2/ Visual features							
Openness to public view	Secondary						
Openness to private view	Secondary						
Relationship with existing urban conurbation	Primary						
Prevention of coalescence	Primary						
Scope to mitigate the development	Primary						
Sub total							
3/ Landscape value							
Strength of character and condition	Secondary						
Sub total							
Overall capacity profile (1 + 2 + 3) =							

Overall Capacity:

Guidelines for development and mitigation measures:

Appendix B – Landscape Capacity Analysis Evaluation Maps

Witham



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Key

Landscape capacity:

- Low Landscape Capacity
- Medium - Low Landscape Capacity
- Medium Landscape Capacity
- Medium - High Landscape Capacity
- High Landscape Capacity

DRAFT

E14887 Braintree District Settlement Fringes-
Evaluation of Landscape Analysis

Witham

Parcel Evaluation

Figure W - 05

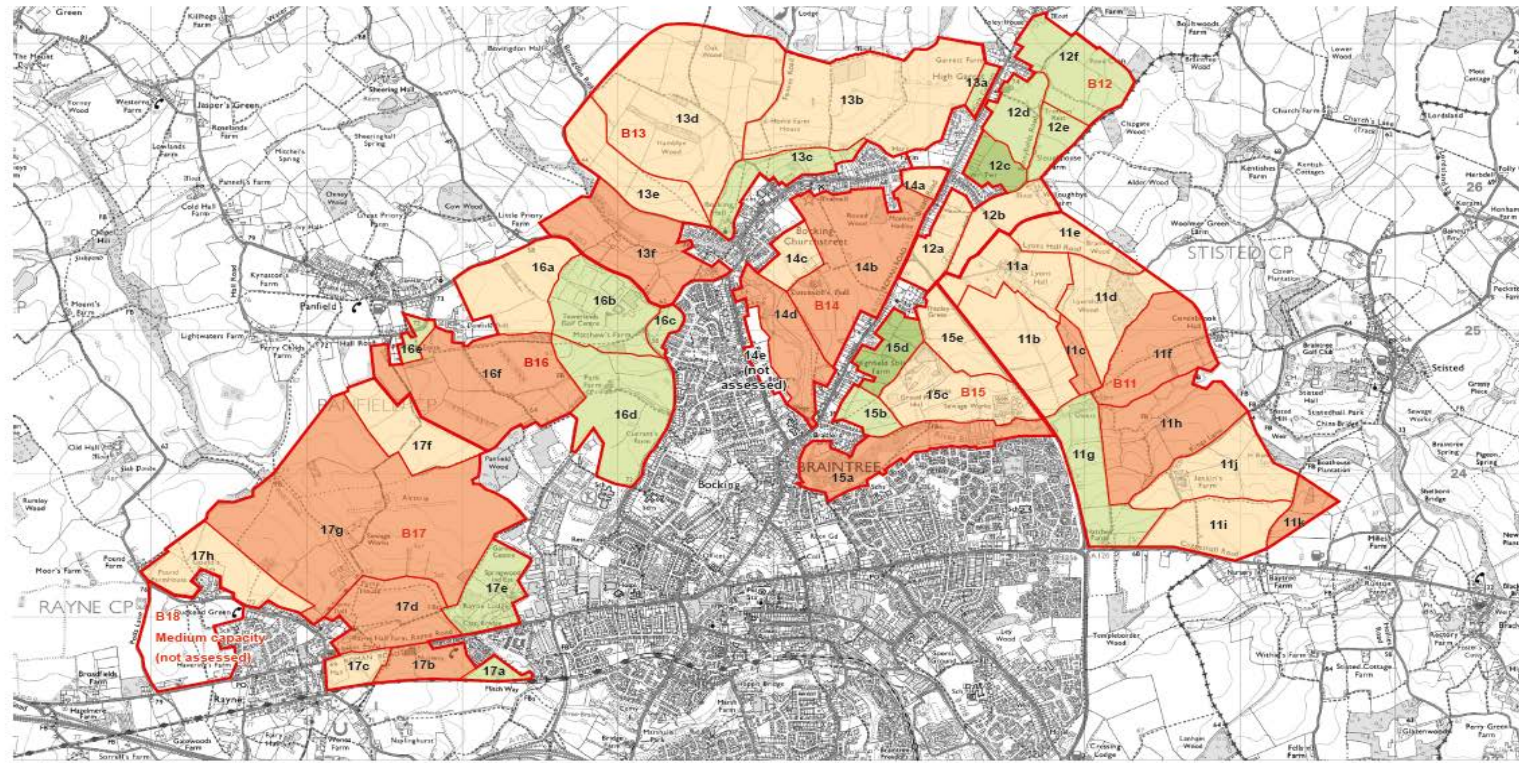
Scale: 1:25,000 @ A3

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Braintree



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Key

— Landscape Setting Areas
— as identified in Landscape Capacity
Analysis (2007) by Chris Blandford
Associates

- Low Landscape Capacity
- Medium - Low Landscape Capacity
- Medium Landscape Capacity
- Medium - High Landscape Capacity
- High Landscape Capacity

E14887 Braintree District Settlement Fringes
Evaluation of Landscape Analysis

Braintree and Environs

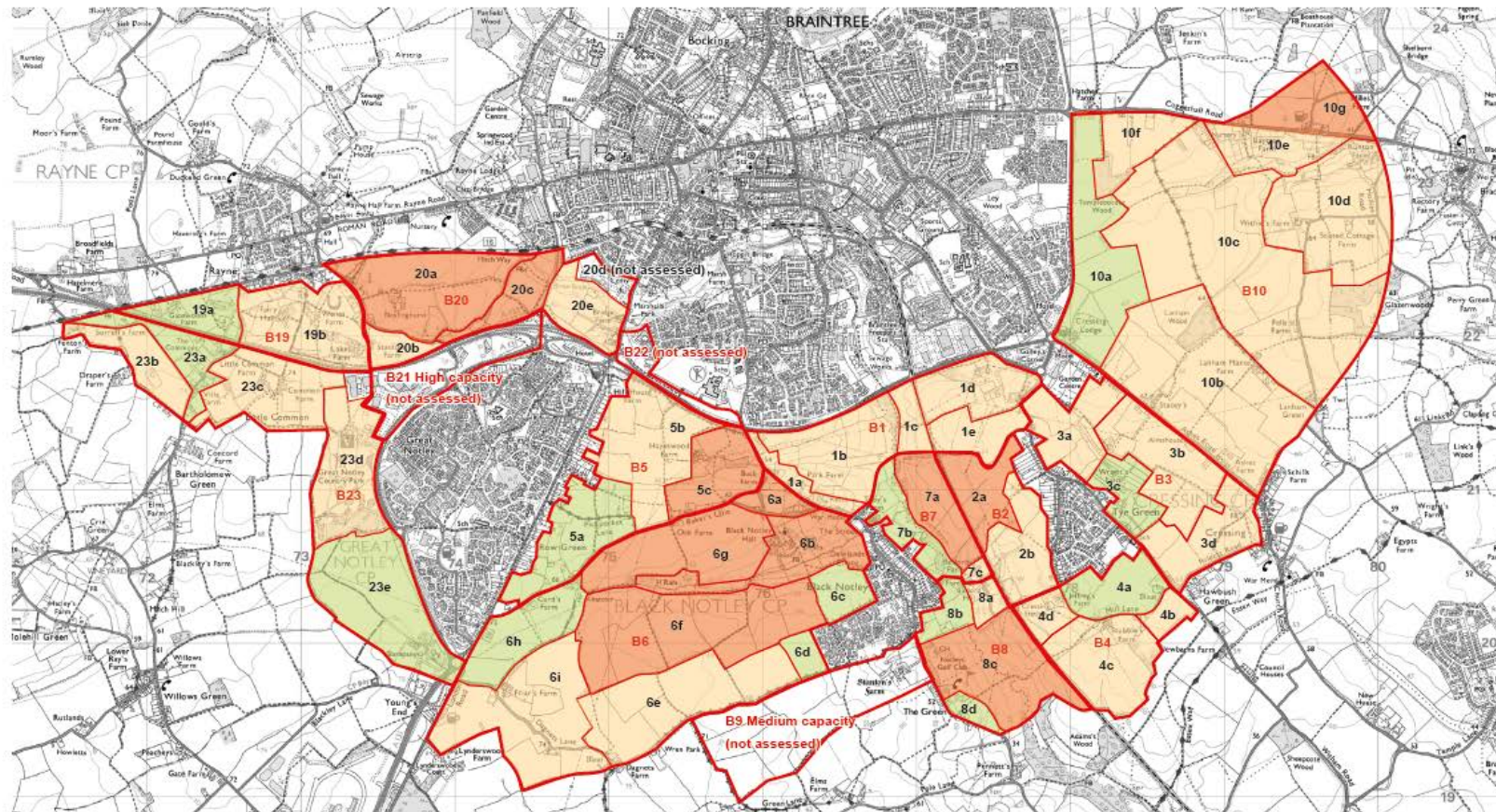
Parcel Evaluation (11-18)

Figure B-08

Scale: 1:25,000 @ A3

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DRAFT

Key

- Landscape Setting Areas
- as identified in Landscape Capacity Analysis (2007) by Chris Blandford Associates

- Low Landscape Capacity
- Medium - Low Landscape Capacity
- Medium Landscape Capacity
- Medium - High Landscape Capacity
- High Landscape Capacity

E14887 Braintree District Settlement Fringes
Evaluation of Landscape Analysis

Braintree and Environs

Parcel Evaluation (1-10 & 10-23)

Figure B-09

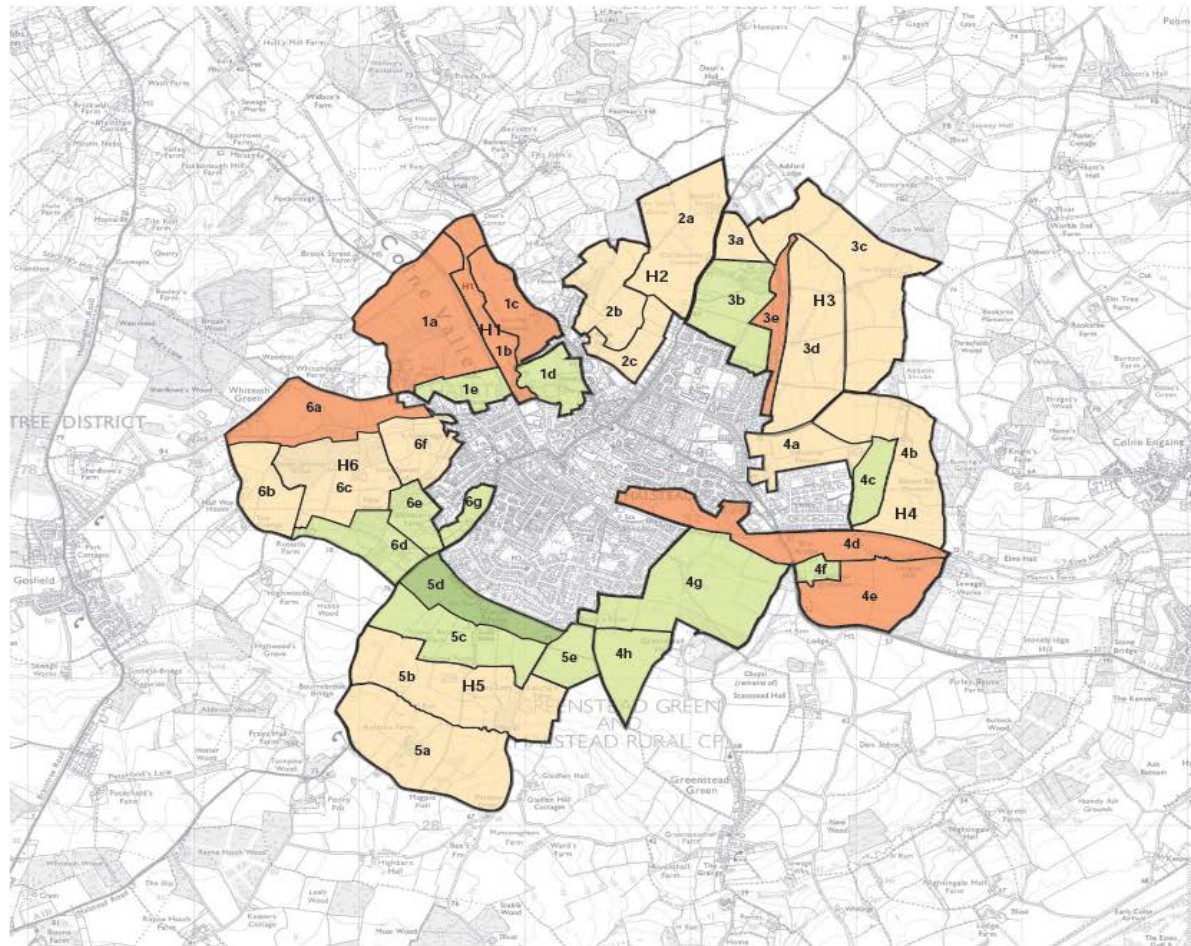
Scale: 1:25,000 @ A3

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Halstead



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Key

Landscape capacity:

- Low Landscape Capacity
- Medium - Low Landscape Capacity
- Medium Landscape Capacity
- Medium - High Landscape Capacity
- High Landscape Capacity

DRAFT

E14887 Braintree District Settlement Fringes-
Evaluation of Landscape Analysis

Halstead

Parcel Evaluation

Figure H - 05

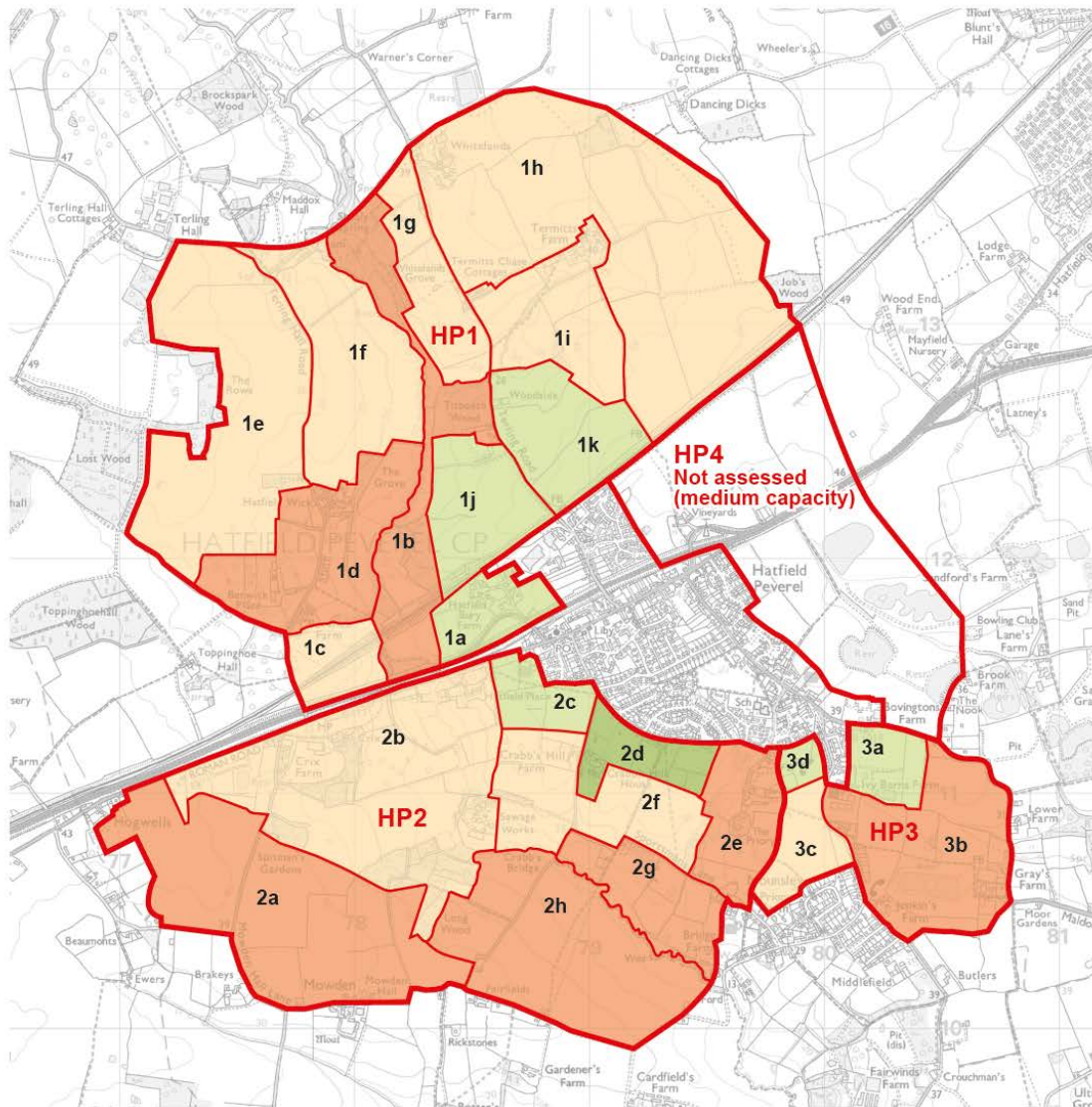
Scale: 1:25,000 @ A3

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Hatfield Peverel



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Key

Landscape Capacity:

	Low Landscape Capacity
	Medium - Low Landscape Capacity
	Medium Landscape Capacity
	Medium - High Landscape Capacity
	High Landscape Capacity

E14887 Braintree District Settlement Fringes
Evaluation of Landscape Analysis

Hatfield Peverel

Parcel Evaluation

Figure HP-05

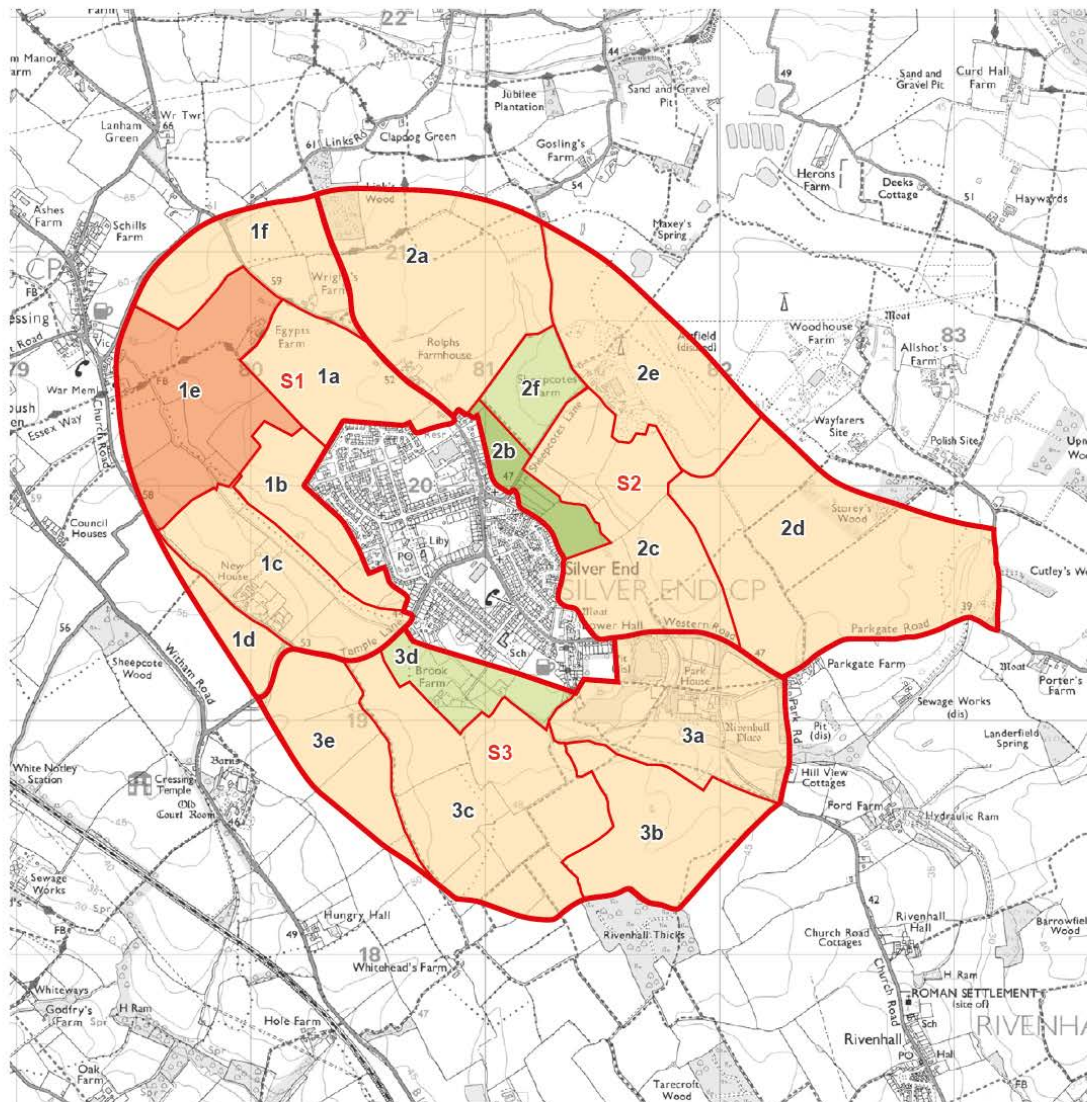
Scale: 1:25,000 @ A4

May 2015



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Silver End



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Key

Landscape Capacity:

	Low Landscape Capacity
	Medium - Low Landscape Capacity
	Medium Landscape Capacity
	Medium - High Landscape Capacity
	High Landscape Capacity

E14887 Braintree District Settlement Fringes
Evaluation of Landscape Analysis

Silver End

Parcel Evaluation

Figure K-05

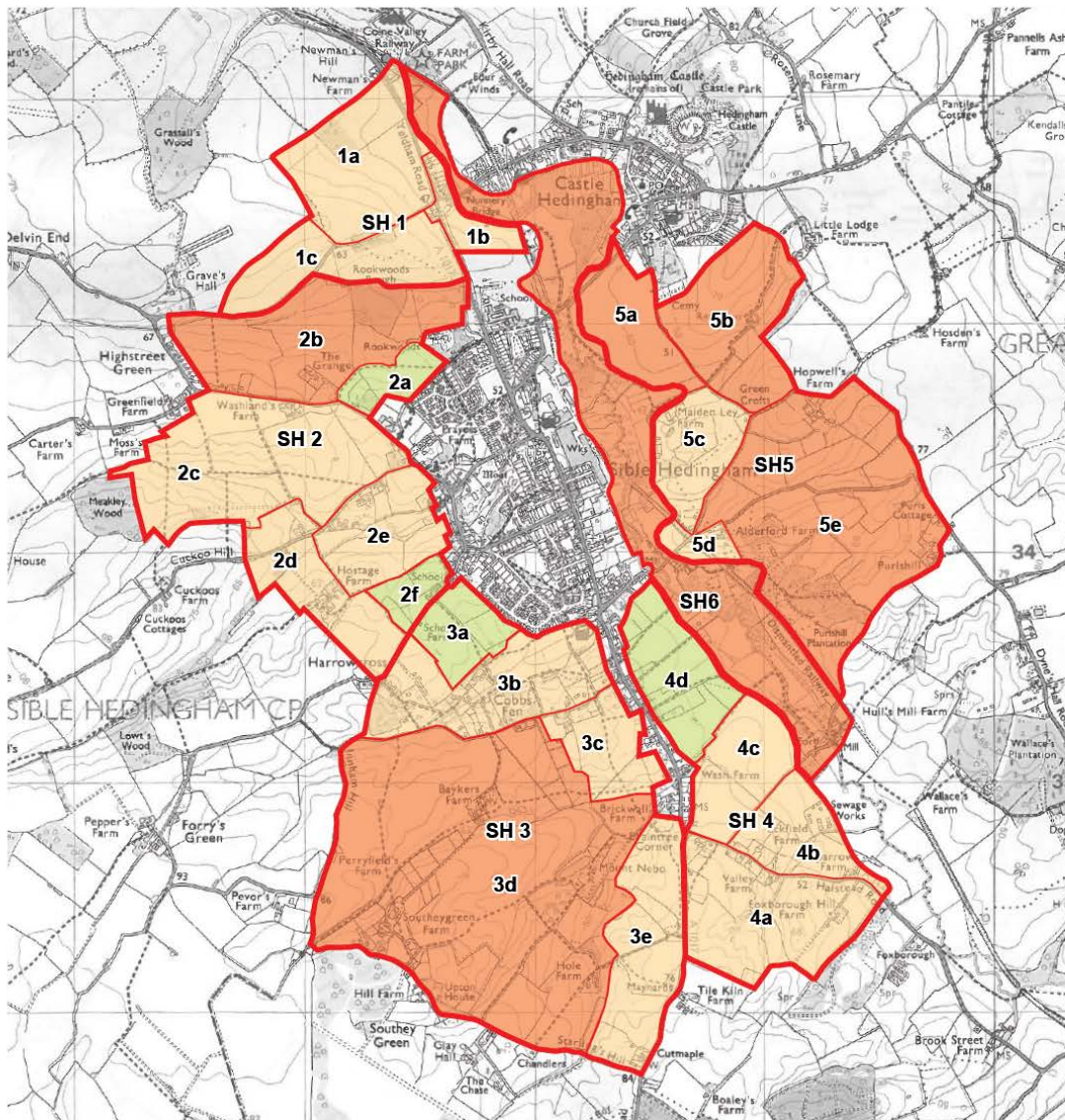
Scale: 1:25,000 @ A4

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Sible Hedingham



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Key

Landscape Capacity:

- Low Landscape Capacity
- Medium - Low Landscape Capacity
- Medium Landscape Capacity
- Medium - High Landscape Capacity
- High Landscape Capacity

E14887 Braintree District Settlement Fringes
Evaluation of Landscape Analysis

Sible Hedingham

Parcel Evaluation

Figure SH-05

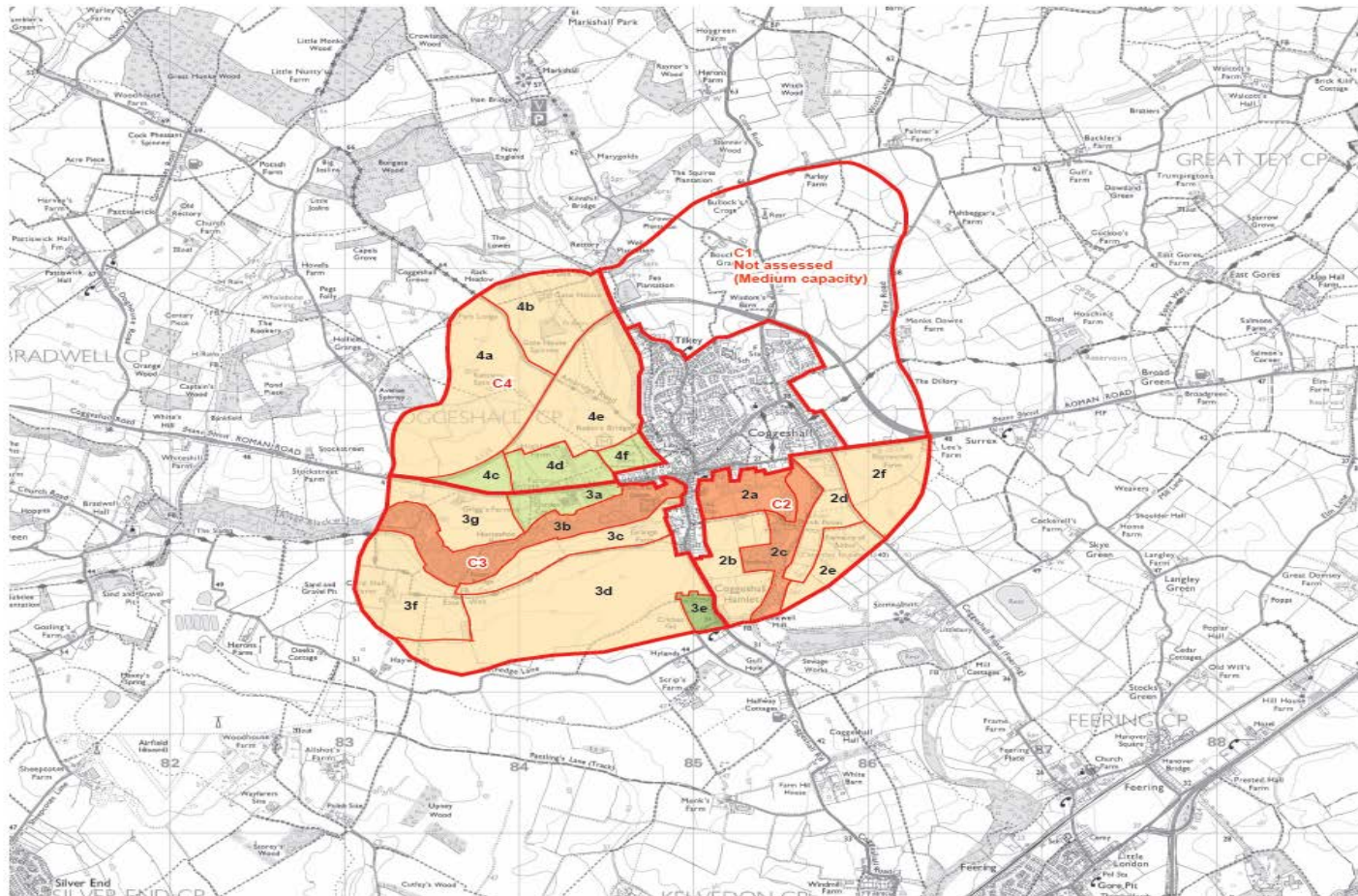
Scale: 1:25,000 @ A4

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Coggeshall



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E14887 Braintree District Settlement Fringes-
Evaluation of Landscape Analysis

Coggeshall

Parcel Evaluation

Figure C - 05

Scale: 1:25,000 @ A3

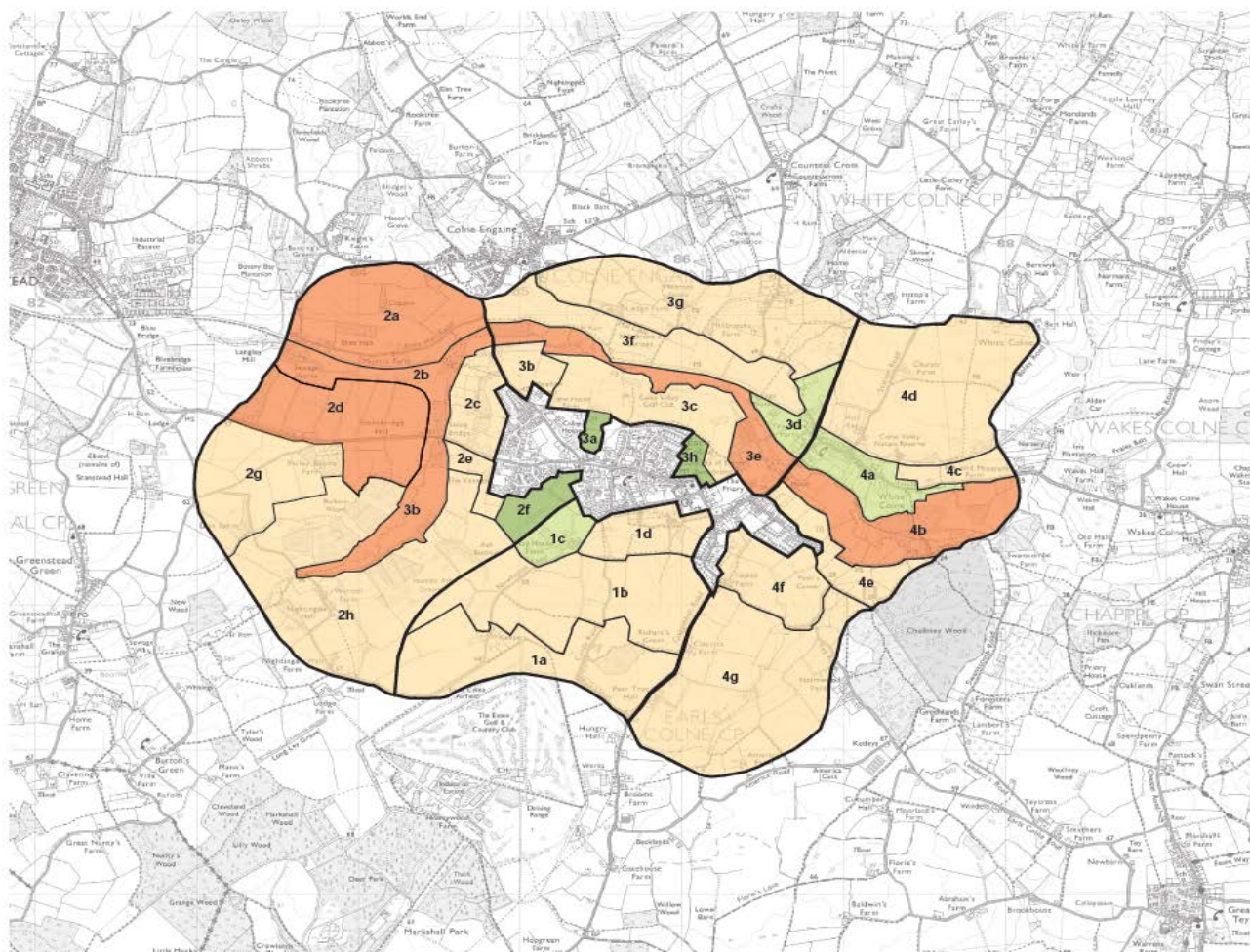
May 2015



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Earls Colne



Key

Landscape capacity:

- Low Landscape Capacity
- Medium - Low Landscape Capacity
- Medium Landscape Capacity
- Medium - High Landscape Capacity
- High Landscape Capacity

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E14887 Braintree District Settlement Fringes-
Evaluation of Landscape Analysis

Earls Colne

Parcel Evaluation

Figure EC - 05

Scale: 1:25,000 @ A3

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Representations to Sustainability Appraisal / Strategic Environmental Assessment Scoping Report – Local Plan Issues and Scoping		Agenda No: 6
Corporate Priority: Securing Appropriate Infrastructure and Housing Growth Portfolio: Planning and Housing Report Presented by: Juliet Kirkaldy Report prepared by: Juliet Kirkaldy		
Background Papers: <ul style="list-style-type: none"> - National Planning Policy Framework (NPPF) - National Planning Practice Guidance (NPPG) - Issues and Scoping Report January 2015 - Environmental Assessment of Plans and Programmes Regulations 2004 - Planning and Compulsory Purchase Act 2004 - EU SEA Environmental Assessment (SEA) Directive 2001/42/EC - Objective consultation database – representations to Sustainability Appraisal/Strategic Environmental Assessment Scoping Report. 		Public Report: Yes
Options: To note the representations submitted to the consultation on the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Scoping Report and the amended assessment framework for SA of site allocations (Appendix B).		Key Decision: No
Executive Summary: It is a legal requirement for the Braintree District Local Plan to be subject to a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). This is an integral part of the plan process, providing regular checks of social, economic and environmental impacts of a plan, leading to informed choices between alternatives. The Local Plan must be prepared taking into account the findings of the SA and SEA to establish a sound evidence base. National Planning Policy Guidance (NPPG) sets out a single appraisal process for the SA/SEA. The Council commissioned consultants to produce a Scoping Report, a requirement of the process. This reviewed other relevant plans, policies and programmes considered the current state of the environment in Braintree District, identified key environmental issues or problems which may be affected by the Local Plan and set out the ‘SA Framework’ which comprises specific sustainability objectives against which the likely effects of the Local Plan can be assessed. The Scoping Report was published for consultation with Statutory Consultees (English Heritage, Environment Agency and Natural England) to accord with legal requirements alongside the Local Plan Issues and Scoping report. The public were also invited to submit comments to the consultation. We received 21 representations to the consultation on the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)		

<p>Scoping Report. This included responses from Natural England, Historic England, Witham Town Council, Bradwell Parish Council and Colchester Borough Council. At the Witham exhibition for the Issues and Scoping document, held on the 3rd February 2015, the appointed SA/SEA consultants presented the report to approximately 20 people. This included public/Parish Councillors/Town Councillors and Ward Members. Representations received to the consultation primarily related to points of clarification, suggested rewording, further explanation required and elaboration to demonstrate compliance with regulations. The assessment framework for the sustainability appraisal has been amended where appropriate to reflect the representations received. (See Appendix B)</p>	
<p>Decision: To note the representations submitted to the consultation on the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Scoping Report and the amended assessment framework for SA of site allocations (Appendix B).</p>	
<p>Purpose of Decision: The SA/SEA Scoping Report will inform the assessment of the emerging Local Plan.</p>	
<p>Corporate implications</p>	
Financial:	The preparation of the Plans set out within the LDS will be a significant cost which will be met through the LDF budget.
Legal:	To comply with Governments legislation and guidance.
Equalities/Diversity	Proposed development and protection of the environment have an impact upon equality/diversity.
Customer Impact:	The SA assesses and predicts the economic, social and environmental effects likely to arise from implementation of emerging Local Plan.
Environment and Climate Change:	The SA assesses and predicts the economic, social and environmental effects likely to arise from implementation of emerging Local Plan.
Consultation/Community Engagement:	The SA will be published for public consultation along with the Issues and Scoping report.
Risks:	The Local Plan could be found unsound. Risk of High Court challenge.
<p>Officer Contact: Juliet Kirkaldy</p>	
<p>Designation: Senior Policy Planner</p>	
<p>Ext. No. 2558</p>	
<p>E-mail: juliet.kirkaldy@braintree.gov.uk</p>	

1. Background

1.1 Braintree District Council has commissioned consultants (*Landuse Consultants Ltd*) to undertake a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) for the emerging Local Plan.

1.2 Sustainability Appraisal of Development Plan Documents is required by Section (19) 5 of the Planning and Compulsory Purchase Act 2004. For Development Plan Documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the European Union SEA Environmental Assessment (SEA) Directive 2001/42/EC, which transpose the SEA Directive into

- 1.3** It is, therefore, a legal requirement for the Braintree District Local Plan to be subject to SA and SEA. Local Plans must be prepared by taking into account the findings of SA/SEA to establish a sound evidence base. This is an integral part of the plan process, providing regular checks of social, economic and environmental impacts of a plan, leading to informed choices between alternatives.
- 1.4** It is possible to satisfy the requirements of a SA and SEA using a single appraisal process. National Planning Policy Guidance (NPPG) sets out a single appraisal process. The consultants will be using this process to assess the emerging Local Plan.
- 1.5** The term 'SA' referred to should be taken to mean '*SA incorporating the requirements of SEA Directive and SEA Regulations*'.

2. SA Scoping Report

- 2.1** The first stage of the SA process (see **Appendix A**) is '*Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope*'.
- 2.2** The SA Scoping Report prepared by the consultants has reviewed other relevant plans, policies and programmes, considered the current state of the environment in Braintree District, identified key environmental issues or problems which may be affected by the Local Plan and set out the 'SA Framework' which comprises specific sustainability objectives against which the likely effects of the Local Plan can be assessed.

3. Consultation on the SA Scoping Report

- 3.1** To meet the requirements of the SEA Directive the views of the three statutory consultees (Natural England, Historic England and the Environment Agency) have been sought in relation to the scope and level to be covered by the SA of the Braintree District Local Plan. We have received responses from Historic England and Natural England.
- 3.2** Consultation was also extended to the public and consultees were asked to consider the following questions in particular:
- Are any significant sustainability issues or opportunities missing or misrepresented in the sustainability profile for the area covered by or potentially affected by the Local Plan? If so, please provide evidence to support suggested additional issues.
 - Do the SA objectives and associated SA methodology provide a reasonable framework with which to address the likely **significant** sustainability effects of the Local Plan?

4. Summary of responses on the SA Scoping Report

We have received a total of 21 responses on the SA Scoping Report.

Statutory consultees

4.2 Natural England - The approach and methodology are acceptable to Natural England. Especially supportive of Objective (6) 'To conserve and enhance the biological and geological diversity of the environment'. Reference to the Habitats Regulation Assessment (HRA) and the need for an Appropriate Assessment screening is welcomed and encouraged.

Braintree is one of three districts working collaboratively on HRA monitoring of coastal sites and this should be fed into the results of the plan as it progresses.

Recommend inclusion of the River Ter SSSI which is adjacent/abuts into the District and could be affected by development proposal within close proximity to it.

Alternatively, if there is no perceived impact on the SSSI this needs to be recorded also and scoped out. Similarly development proposals are being considered for the area around Glemsford Pit SSSI and this will need to be considered in future iterations of the report.

Welcome reference to Dedham Vale Area of Outstanding Natural Beauty (AONB). The AONB Partnership extends into Stour Valley area (And the Stour Valley project area) and consideration should be given to their Management Plan, especially in respect of the number of solar farm and wind farm applications here.

4.3 Historic England - English Heritage has updated its guidance on Sustainability Appraisals. There appears to be a lack of reference to national and local cultural heritage documents within the list of documents scoped. Our guidance sets out a number of relevant plans, programmes and policies. In terms of local plans and programmes, it would be helpful to include reference to the Districts conservation area appraisals and management plans. There is no reference to the PPS5 Practice Guide which remains an extant document. English Heritage has consulted on three Good Practice Advice Notes that are likely to replace the PPS5 Practice Guide in 2015. Paragraphs 3.47 to 3.51 provide a useful overview of cultural heritage and townscape issues. While there is reference to buildings at risk and the local Essex register, there should also be reference to the national Heritage at Risk register maintained by English Heritage. It would be helpful to consider potential new and/or updated evidence for cultural heritage, bearing in mind Paragraph 169 of the NPPF. The SA Objective relating to the historic environment (No. 10) should be updated to reflect national planning policy terminology. It would read better as to conserve and enhance the historic environment, heritage assets and their settings. The indicative appraisal questions shown in Appendix 2 are reasonable, although the first could be clearer and simply refer to will it protect and enhance heritage assets. The indicators seem less relevant to an appraisal of policies than an appraisal of sites. It is not clear how you could appraise the heritage impact of a general non site specific policy against these indicators. Our guidance provides further advice on specific indicators. In terms of the approach to the appraisal of site options, we have some reservations about the mixing of Environmental Impact Assessment approaches within a Sustainability Appraisal that incorporate Strategic Environmental Assessment (given that EIA assesses specific proposals and projects while SEA assess programmes and plans). The Scoping Report takes a strong proximity based approach to the

historic environment, with Table 4.3 and Appendix 3 measuring impact based on distance alone. There is a flawed assumption in Appendix 3 that negative effects occur when sites are nearer to heritage assets, with no possibility of positive effects relating to heritage assets. We strongly recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or inter-visibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too.

The following broad steps might be of assistance in terms of selecting sites:

- Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale. Assess the contribution of the site to the significance of heritage assets on or within its vicinity. Identify the potential impacts of development upon the significance of heritage asset.
- Consider how any harm might be removed or reduced, including reasonable alternatives sites.
- Consider how any enhancements could be achieved and maximised.
- Consider and set out the public benefits where harm cannot be removed or reduced.

We note the difficulty of carrying out a formal appraisal of the Local Plan at this point given the early stage of preparation. The commentary appears to largely lack references to the historic environment, other than under the High Quality Spaces heading. We have not considered paragraph 5.50 to 5.56 in detail, but it appears to contain interesting thoughts

Town Council/Parish Councils/Adjoining Authorities

4.4 Witham Town Council - Need to add policies which support:-practical access to health facilities appropriate to an ageing population both locally (doctors surgeries, clinics, pharmacies etc.) and also to larger facilities such as hospitals which are becoming increasingly centralised across the district. Direct public transport for Witham residents to hospitals in Chelmsford, Braintree and Colchester is non-existent at present. Provision of adequate parking (*for commuters, within town centre both for people working there and shoppers, and also for local residents*). Provision of park and ride facilities on outskirts for workers within a town centre. Parking and access provision for mobility scooters 4.38 recommended walking distances - does this take into account an ageing population. Support a rail link from Witham to Stansted. Support a safe footpath link from the town to James Cooke Wood on the Maldon Rd. Town centre regeneration, support bring back empty shops into use.

4.5 Bradwell Parish Council - Paragraph 3.39 Fluvial Flooding Why is Bradwell not mentioned? River Blackwater runs right through Bradwell and many homes have flooded in the past.

4.6 Kelvedon Parish Council - Kelvedon Parish Council would like to see consideration given to the influence of neighbouring districts on sustainability issues. With direct access to the A12 and a mainline railway station Kelvedon is directly

influenced by the expansion of neighbouring villages which utilise facilities in Kelvedon, in particular Tiptree which is within the Colchester authority area of control. The sustainability of future development in the east of the district of Braintree needs to factor external influences outside the control of the Braintree District Council Local Plan. Broadly in agreement with the methodology but concerned by the weighting attached to the label 'key service village' and the absence of any reference to the available capacity of key services, including education and healthcare facilities, roads and public transport. Key indicators should be excluded from the methodology where it can be evidenced that little or no spare capacity exists.

4.7 Colchester Borough Council - The range of issues and opportunities are well documented. Assessment of sites in the SA will have to be mindful of assessing all reasonable alternatives for strategic growth locations, reasons for rejection documented as part of a detailed audit trail. Important cross-boundary sites and spatial strategy options that may emerge from this Issues and Scoping consultation. The SA at the Draft Local Plan stage would be seen to appraise options / alternatives initially as either preferred or rejected and it will be important that the SA not only indicates that all options are assessed consistently, but that their assessment has fed into the site selection process. PPG guidance states that reasonable alternatives should be identified and considered at an early stage in the plan making process as the assessment of these should inform the preferred approach. Consideration of these additional alternatives, if reasonable, will have to be robustly evidenced in the SA. It will be important that these alternatives are also assessed to the same level of detail as the preferred options. The Colchester Borough Council Local Plan Issues & Options consultation document looks at reasonable growth / development strategy options. A number of these explore the potential for a separate sustainable settlement to the west of Colchester town that would extend in part into Braintree District. Should this option become an allocation, or form an integral part of the growth strategy in both the Colchester and Braintree Local Plans, it will be important that the Sustainability Appraisals of both authorities Local Plans both explore all reasonable alternatives in line with the requirements of the SEA Regulations. In addition, the assessment of any cross-boundary site may need to respect the two SAs respective methodologies.

Summary of representations received from members of public/planning agents/other organisations

- The second SA objective is 'to provide everyone with the opportunity to live in a decent home' whilst the sentiment of the objective is supported, it is too loosely worded. The wording needs to encompass both current Braintree residents and those who will come to the District in the period to 2033.
- The 'sensitive criteria' should include flood zones. But should recognise that some strategic sites may contain land within flood zones 2 and 3 which is not proposed for development but is included to give the development a significant sense of place and character.
- The walking distance to facilities should not simply be to existing facilities. When a development proposal includes (for example) an on-site primary school or employment area, these should be used for the purpose of measuring distances.
- Agree should include policies to reuse contaminated land (after restoration). When

considering potential sites, the assessment process should aim to positively score sites which decontaminate and use previously contaminated land.

- Objective 6: There should be an appraisal question identifying whether the site contains previously developed land.
- Objective 15: There should be a question relating to use of contaminated land and enhancing poor quality / despoiled landscape.
- Concerns over the already, over-subscribed schools, doctors, parking etc. particularly in Silver End you will be pushing this village, beyond its capability of being able to provide it with the services its residents need, that are already stretched.
- As per NPPF section 118, I would like to see the inclusion of assessment with respect to the loss or deterioration of irreplaceable habitats
- I would like to see an assessment of the impact of light pollution
- There are many people who are disadvantaged and in need of social and economic advance. There seems to be too much emphasis on enhancing nature and the environment and too little focus on promoting social wellbeing and economic improvement.
- To achieve sustainable levels of prosperity and economic growth'. Includes various indicative appraisal questions relating to socio economic matters. Amend wording of paragraph 3.77 to remove wording 'suggests'. Not relevant or necessary to include reference to land drainage in arable field systems.
- Paragraph 1.21 whilst it is suggested that economic considerations will be set out in appendix 1 there are no targets or indicators relating to economic development in Appendix 1. Indeed only one citation of term socio economic in entire document.
- SA scoping document fails to take account of the most fundamental aspect of human welfare and does not appear fit for purpose. Paragraph 3.13 LCA is carried out by people who are interested in landscape. As such they are not impartial observers. Their evidence must be viewed in light of a self interest group and judged against the overall social wellbeing of everyone including those who do not place landscape at the centre of their interest.
- 3.16 What has changed since 2006 that a new LCA must be commissioned? Farming is still the same as it was.
- 3.44 The document fails to take account of land drainage installed in arable field systems.
- 3.77 Evidence does not suggest anything. Interpretation of evidence may suggest something but evidence itself is simply fact. To suggest that evidence suggests a level of subsidised housing is justified is not evidence it is opinion. It has no place in a background portrait of the existing situation. Similarly, guidance on property size is again opinion not evidence.
- 3.79 Interpretation of these figures leads to a conclusion that planning policy is failing to meet the needs of the present generation. However, it is recognised that

statement is opinion and not fact.

- 3.88 It is notable that the SHMA and this document fail to take account of the existing housing shortage. As such this document fails a significant art of baseline evidence and is not fit or purpose until this is rectified.
- 3.92 There is no evidence presented to demonstrate that travel needs are met by public transport.
- 3.95 The document fails to recognise that both the A12 and A120 go to the same place and that transport links outside the district are constrained.
- 4.1 to 4.16 do not indicate how much weight will be given to the 16 SA objectives outlined in table 4.1. As such it is possible that some policies or site allocations will achieve a poor assessment because they may affect a large proportion of the SA objectives even though there may be a significant benefit form one measure such as economic growth.
- Chapter 5 Most of this chapter appears to be commentary and speculation.
- 5.18. The comment that enhanced town centres could also increase traffic flows and congestion. which could reduce the attractiveness of town centres relative to out of town or out of district is not borne out by evidence.
- 5.23 There is only one citation of the word shortage in the entire document where it refers to housing type and not overall housing supply. Starting a plan development without taking account of this renders the housing delivery figures unreliable and possibly renders any subsequent plan unfit for purpose.
- Support sites such as STEB 392 which are within the village envelope and which meet the NPPF, and, in particular paragraph 55
- Within the areas of Cog180 and Cog175 there is a nature reserve which has a pond where great crested live also rare butterfly breeds here and with Essex Nature Trust threw out the plan to build on these sites, nothing has changed, only the date.
- This section, bar one instance (*Climatic Factors*) does not address the likely evolution of the baseline of the plan. Given that this future baseline is what the effects of the plan (and alternatives) would be determined against we are left in the dark as to how exactly effects are to be determined.
- The document as a whole is, by and large, lacking in any references. For example, paragraphs 3.25 3.29 contain a number of figures and statistics without a single reference to where a reader might be able to find the data (we presume these are Defra figures).
- We question the validity of the data present. To take the example of the emissions figures, the National Atmospheric Emissions Inventory has data from 2012 (see: <http://naei.defra.gov.uk/data/local-authority-co2-map>). Use of out of date data further undermines the credibility of the evidence base. See also paragraph 3.21 which has transport data from 2004. The evidence base section needs a comprehensive review.
- The issues are included within Chapter 3. This is not the case. The sustainability issues are tucked away in Appendix 2: 'Proposed assessment framework for SA of

policies'. Sustainability issues are an amalgamation of both the baseline and the context review. In this sense they should be presented in both the appropriate context and location (in the main report).

- Inconsistency between the table in Appendix 2 and the evidence in Chapter 3. Paragraph 3.61 references an increase in Domestic Burglary of 47.2%, however, the sustainability issues column in Appendix 2 references Percentage increases in the offences of violence against the person, burglary of dwellings, theft from a motor vehicle, and sexual offences between 2009/10 and 2010/11.
- Need a comprehensive review of the links between the evidence base and the SA Framework needs to be undertaken to ensure consistency and currency.
- 4.13 mentions 'each policy and site allocation option'. We presume that this should read 'site allocation' and not 'site allocation options' at this stage (appraisal of the draft plan) there should be preferred policies and sites and the options testing has already been undertaken.
- We suggest policy and site options and then preferred policies and sites.
- With regard to defining significance, this does not appear to have been done effectively or clearly.
- At a minimum we would expect to see a statement that significance would be based on expert judgement but ideally the section would set out that all conclusions of significance would be undermined through a discussion of the magnitude of the impact predicted and the likely receptors of that impact.
- Table 4.3 reflects a sensible approach to establishing the potential for significant effects, however it is rather one-eyed. There is no consideration with regard to socio-economic sensitive areas (e.g. Lower Super Output Areas at high levels of deprivation). This should be included or risk the appraisal being accused of bias.
- 4.34 sets out the assumption that allocated housing sites with a capacity of at least 700 new houses or 1,000 units (mixture of flats and houses) are assumed to incorporate a new primary school and a bus stop with at least one bus per day, seven days per week. This does not appear to be justified by any evidence.
- The standard straight line approach. We think this is not appropriate for measuring criteria such as walking / driving distance to local facilities and so on. It is not clear where these measurements will be taken from. It is not clear whether access point for the sites have been considered. This is an important aspect of determining the accessibility of a site.
- Insufficient priority and urgency given to quality of life (and district attractiveness) issues: Traffic management - jointly with the appalling main route congestion - and partly caused by this - the traffic management within the towns, especially Braintree, is totally inadequate. To talk of massive housing and population increases without prioritising the resolution of this is irresponsible. Education - the standard of the education available to Braintree resident children is poor.
- The SA objectives and methodology are generally supported. However, the list of issues fails to include the unsustainable, high level of out-commuting currently experienced within the District. This issue therefore should be included, and

consequently addressed in the Options.

- There may be an implied bias towards major developments in this paragraph by reference to urban extensions and new settlements without reference to smaller more dispersed development options as well.
- 3.16 Difficult to comment on this document if there is to be a revised Landscape Assessment due later in 2015.
- 3.21 and 3.22 the levels of pollution appear to discount development being allowed in the locality of these findings. It is noted this referred to in the Issues and Scoping Document.
- The Scoping Report sets out that the scope of the appraisal reflects the geographic scope and objectives of the plan. This is correct in regard to the SEA Regulations. However, what this approach fails to appreciate is that sustainability issues are not bound by administrative boundaries. It is not enough to consider to just explore larger than local issues as part of discharging the Duty to Cooperate. Larger than local considerations will also need to feed into the development and appraisal (SA) of spatial strategy alternatives. On the basis of the Scoping Report published there can be no confidence that this is set to be the case. There is a notable absence of spatial discussion (and maps), i.e. discussion of constraints and opportunities arising at relevant scales, and at specific localities within and outside of district boundaries.
- The document recognises the positive effects that could arise as a result of providing the majority of new housing within or adjacent to existing settlements. These positive effects are cited as being access to local services and integration within existing communities. This is not just of relevance to the major settlements within the District but also those parts of the District that perform equally well in sustainability terms, if not better than expansion of some of the key settlements.
- The sustainability issues should also make reference to the benefits of proximity to existing and proposed major employment areas. The report states that there may be negative effects arising from placing additional development within existing settlements, including increased pressure upon community services. Whilst this can be the case in some instances, an appropriate quantum of development and injection of new housing can assist in the continued viability of services in parts of the District and will therefore have an overall positive impact.
- The SA objectives and methodology are generally supported. It is considered that SA objective 4 should not just refer to the main service centres but also appropriate villages whose shops and services are equally as important to support. An additional appraisal question should therefore ask: Does the development help support the vitality and viability of the existing facilities within the settlement?
- Infrastructure and services must be in place before house-building on the level proposed (950 per annum) is allowed to go ahead.
- BDC must work with Essex County Council, National Government and the relevant bodies to ensure that a strategic infrastructure plan is in place.
- The A120 dualling study between Braintree and Marks Tey is scheduled to start later this year and until the route is fully selected, the location of large housing

developments such as West Tey cannot be agreed since access from these developments onto new roads will be needed.

- Urban sprawl is not sustainable and we believe that particular care must be given to ensure that the 'triangle' between the A12 and the A120 with Witham, Marks Tey and Braintree as its points does not become an area of urban infill.
- Proposal for a new town at West Tey in call for sites. Concern that this new town is discussed at length in the Colchester consultation documents but not in the Braintree documents, despite the acknowledgement that such a town would provide significant housing for Braintree District.
- New settlements must be urban extensions, not isolated settlements. By creating urban extensions which are easily accessible to the centre of Braintree, the town itself becomes more vibrant and traffic levels are reduced.
- Jobs must be near to new developments and accessible by foot, bike or public transport. It is not enough to set aside space for employment. In addition, businesses will think twice about locating to Braintree District with the roads and rail network as they are now, particularly with the projected population and car increase if nothing is done to reduce car use.
- High density housing must be given priority as a key solution to reducing the destruction of green-field land, prevention of urban sprawl, reducing the need for travel by car and to providing smaller housing units which people on local salaries can afford to buy.
- Braintree District must continue in its efforts to develop brown-field land, empty homes and commercial property.
- The sustainability issues fail to mention that what is equally as important in terms of the overall economic 'offering' of the District, is not only the quantum of employment land required but also the need for a range of suitable sites to be provided in order to meet the needs of varying sizes and types of businesses. There is a need for suitable employment premises within the rural areas in order to enable the continued growth and prosperity of existing rural businesses, as well as providing more affordable accommodation for self-starters. The social and economic benefits of rural employment have not been fully recognised.
- The Sustainability scores and weighting methodology adopted should be open and transparent when assessing each policy and each and every site, and then be open to a public response.
- 4.37 the 25% approach appears arbitrary and unsupported by evidence and so may prove unsound. This requires clearer justification.
- 4.38-39 "ped-shed" distances adopted based upon the quoted institute of Highways and Transport are noted but these should be applied with discretion and some flexibility. In rural areas longer walking distances can be more acceptable compared to urban areas. Differentiation is required.
- 5.14.-5.22 no reference to impact of small amounts of additional housing to villages that can then make a business viable which was failing, and which may then allow pubs, shops and other community facilities and local services and the social infrastructure to continue despite falling household size and potentially falling car

use.

- No development in villages or hamlets as an approach at this stage is of itself inappropriate and would be unsound. This would then support the Community Facilities approach proposed.
- 5.34-5.44 The linking of rail and bus services to extend the scope for dispersed sustainable development should also not be overlooked. Public transport corridors as potential sustainable development areas should be taken into account in the Appraisal.
- **CPRE** - Excellent document which should underpin developing Local Plan. Meeting housing demand should not take precedence over environmental and social sustainability in planning decisions. Concerned need to find desirable sites should not prevail over policies restricting development over open countryside or existing Greenfield sites. We are determined to prevent the urban sprawl which threatens us in the Braintree District. Every possible acre of agricultural land must be preserved for future generations. The report fails to address this extremely important issue. Concerned majority of sites put forward by landowners and developers are spread along the A120 between Great Dunmow, Braintree, Coggeshall and Marks Tey. The local road network and the A120 are struggling to cope with existing traffic volumes and wholly unable to service substantial new development. Commendable focus in the Scoping and Issues document on encouraging sustainable modes of transport which will reduce the carbon footprint and improve the health of residents. There should be stronger emphasis on rail travel as an alternative to road. There should be a strong presumption in favour of maintaining footpaths and bridleways when new development is considered. The larger villages of Coggeshall, Kelvedon and Earls Colne should be protected from development which is out of scale with the existing settlement and sprawl must be prevented.

Officer Comments

The representations received to the SA/SEA Scoping Report have been considered by our consultants (LUC). Appendix B of this report includes the proposed amended assessment framework for SA of policies and proposed assessment framework for SA of Site Allocations following the representations received. It should be noted that the proposed changes to the SA methodology and the record of responses to consultee comments on the proposed methodology will be published as part of the SA report at the next stage, to accompany the Preferred Options.

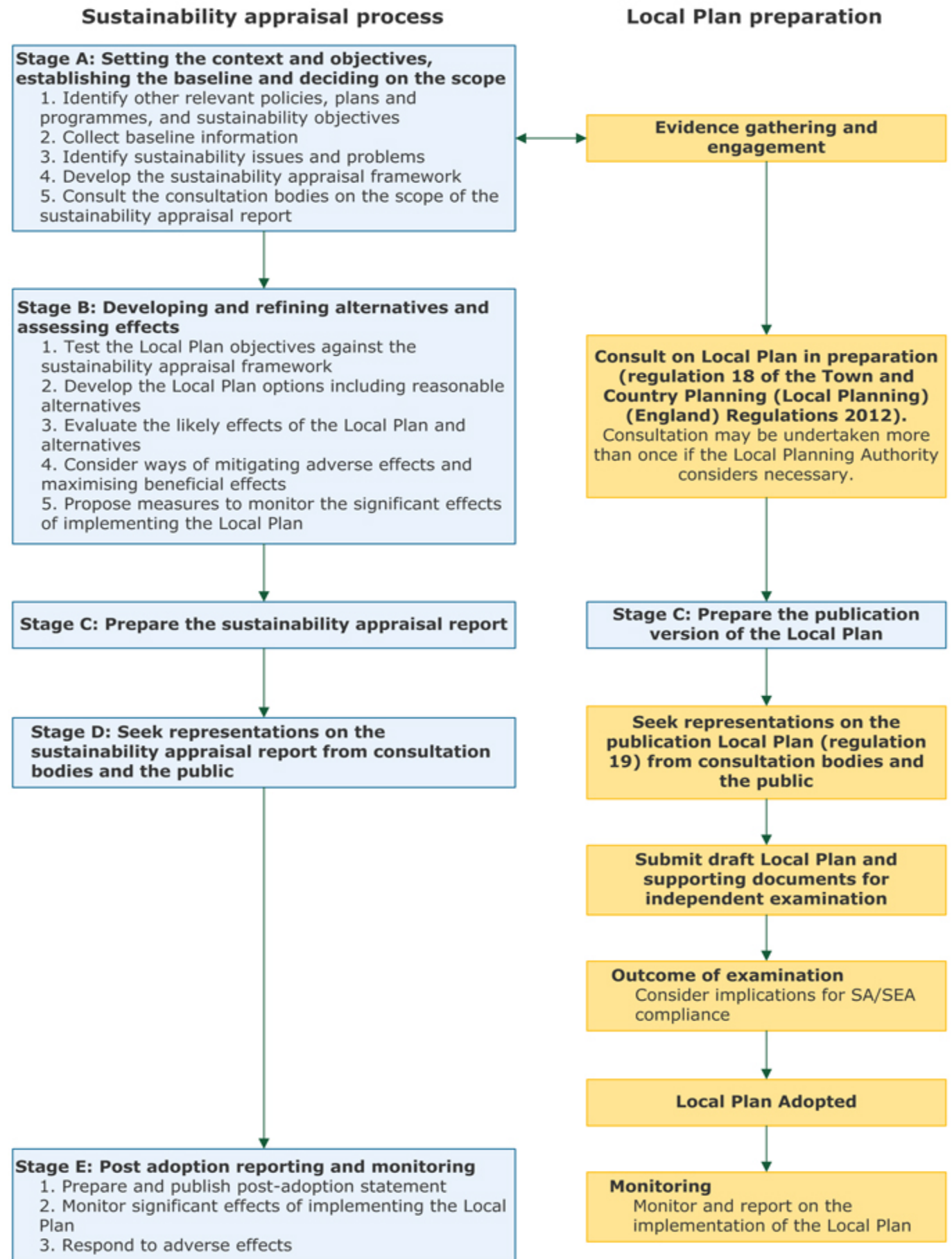
5. Next Stages

5.1 The next formal output of the SA process will be at the Draft Plan stage, during which preferred and reasonable alternative policy and site allocation options for the Local Plan will be appraised. The results of this assessment will inform officers in their preparation of subsequent iterations of the Local Plan.

6. Recommendation

6.1 To note the representations submitted to the consultation on the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Scoping Report and the amended assessment framework for SA of site allocations (Appendix B).

APPENDIX A



APPENDIX B – Extract from Sustainability Appraisal for Braintree District Local Plan - Amended methodology responding to consultation on SA Scoping Report

Appendix 2

Proposed assessment framework for SA of policies

Sustainability objective	Sustainability issues	Indicative appraisal questions	Potential indicators
1) Create safe environments which improve quality of life and community cohesion	<p>Percentage increases in the offences of violence against the person, burglary of dwellings, theft from a motor vehicle, and sexual offences between 2009/10 and 2010/11.</p> <p>Lack of community facilities for young people.</p> <p>Lack of cultural facilities.</p>	<p>Does it seek to improve / supply community facilities for young people?</p> <p>Does it seek to increase cultural activities or suitable development to stimulate them?</p> <p>Does it seek to reduce inequalities between areas and support cultural identity and social inclusion?</p> <p>Will there be measures to increase the safety and security of new development and public realm?</p>	<p>Recorded key offences.</p> <p>KSI casualties for adults and children.</p> <p>Public perceptions on leisure / community facilities.</p> <p>Street level crime statistics.</p>
2) To provide everyone with the opportunity to live in a decent home	<p>Lack of social housing 0.1% of housing stock owned by the Local Authority (7.6% nationally).</p> <p>Housing should respond more to demographics in population growth.</p> <p>Lack of care homes and capacity in existing care homes.</p> <p>Rural affordable housing is currently not suitable for rural areas and those who require them.</p>	<p>Will it increase the range and affordability of housing for all social groups?</p> <p>Does it respond to the needs of an ageing population?</p> <p>Does the site respond to a housing type shortage as identified in the SHMA and responding to demographics in population growth?</p> <p>Does it seek to provide appropriate rural affordable housing?</p> <p>Does it seek to provide additional capacity in or of care homes?</p> <p>Will it promote an increase in social housing?</p> <p>Will it support development of homes that are adapted to a changing climate?</p>	<p>House Prices.</p> <p>Indices of Multiple Deprivation Score – particularly Housing and Services Domain and the Living Environment Deprivation Domain.</p> <p>Number of affordable dwelling completions.</p> <p>Annual dwelling completions.</p> <p>Population projections and forecasts.</p>
3) To improve the health of the District's residents and mitigate/reduce potential health inequalities	<p>Increases in obesity in Year 6 children and adult obesity higher than the national average.</p> <p>Uptake of sports and leisure facilities.</p> <p>35% of households within Braintree District do not have any access to natural greenspace.</p> <p>Greenspace in urban areas to be</p>	<p>Will it improve access to high quality health facilities?</p> <p>Will it increase access to sport and recreation facilities, open space and/or SANG?</p> <p>Will it encourage access by walking or cycling, and will it increase the overall rates of walking and cycling?</p>	<p>Life Expectancy.</p> <p>Indices of Multiple Deprivation – Health and Disability sub-domain scores.</p> <p>Residents opinion on availability of open space/leisure facilities.</p> <p>Natural England Accessible Natural Greenspace Standards (ANGSt).</p>

Sustainability objective	Sustainability issues	Indicative appraisal questions	Potential indicators
	<p>safeguarded against development for other means.</p> <p>Lack of walking and cycling infrastructure.</p>		<p>Location and extent of recreational facilities to development site.</p> <p>Location and extent of accessible greenspace to development site.</p> <p>Proximity of site to healthcare facilities</p> <p>Percentage of population obese.</p> <p>Number of GPs and dentists accepting new patients.</p> <p>Number or % of open spaces receiving Green Flag Award.</p>
4) To promote the vitality and viability of all service centres throughout the District	<p>Lack of retail and non-commercial office floorspace in relation to the total proportion of commercial and industrial floorspace.</p> <p>Significantly lower than county and national averages.</p>	<p>Does it prevent further loss of retail and other services in rural areas?</p> <p>Does it promote and enhance the viability of existing centres by focusing development in such centres?</p> <p>Will retailing in town centres be enhanced in areas of identified need?</p> <p>Does it seek to increase the proportion of retail and non-commercial office floorspace (as a proportion of total commercial and industrial floorspace) in the District?</p>	<p>Amount of retail, leisure and office floorspace in town centres.</p> <p>Implemented and outstanding planning permissions for retail, office and commercial use.</p> <p>Number and type of services from Rural Services Study.</p> <p>Number of post offices closed down.</p> <p>Number of village shops closed down.</p> <p>Pedestrian footfall count.</p>
5) To achieve sustainable levels of prosperity and economic growth	<p>Braintree District has a lower job density than both the region and Britain.</p> <p>The District displays a significantly higher percentage of employment in 'manufacturing' and 'construction' in comparison to the region and the country and significantly lower employees in the 'finance, IT and other business activities' sector.</p> <p>Factories and warehouses account for the majority of industrial and commercial floorspace in 2008.</p> <p>Too much employment land being developed for other uses, particularly</p>	<p>Will new housing be supported by adequate local employment opportunities?</p> <p>Does it support small businesses to grow and encourage business innovation?</p> <p>Will it make land and property available for business development?</p> <p>Will it provide a range of suitable employment sites to meet the needs of varying sizes and types of businesses?</p> <p>Will it enhance the District's potential for tourism?</p> <p>Will it encourage the rural economy and</p>	<p>Employment land availability.</p> <p>Typical amount of job creation (jobs per ha) within different use classes.</p> <p>Percentage change and comparison in the total number of VAT registered businesses in the area.</p> <p>Businesses by industry type.</p> <p>Amount of vacant industrial floorspace.</p> <p>Amount of high quality agricultural land.</p> <p>Travel to work flows.</p> <p>Employment status by residents and job</p>

Sustainability objective	Sustainability issues	Indicative appraisal questions	Potential indicators
	<p>housing.</p> <p>Lack of focus on tourism.</p> <p>Need for rural diversification and increased rural employment opportunities.</p> <p>Need to promote and aid the expansion of small businesses.</p> <p>Broadband inequalities across the District meaning home working and rural employment is stifled.</p> <p>The Essex Minerals Plan identified a number of primary minerals extraction sites in the District.</p>	<p>diversification of it, whilst minimising impacts on the rural environment?</p> <p>Will it lead to development having an adverse impact on employment for existing facilities?</p> <p>Does it seek to increase broadband coverage / bandwidth, especially in rural area?</p> <p>Does it avoid sterilising minerals extraction sites identified by the Essex Minerals Plan?</p>	<p>type.</p> <p>Job densities.</p> <p>Economic activity of residents.</p> <p>Average gross weekly pay.</p> <p>Proportion of business in rural locations.</p> <p>Implemented and outstanding planning permissions for retail, office and commercial use.</p> <p>Number of minerals sites safeguarded for extraction.</p>
6) To conserve and enhance the biological and geological diversity of the environment	<p>There are 4 Sites of Special Scientific Interest (SSSIs). 5% of the Bovingdon Hall Woods SSSI is 'unfavourable no change'. Parts of both Belcher's & Broadfield Woods and Glemsford Pits SSSIs are in a state of 'unfavourable recovering'.</p> <p>There are approximately 251 Local Wildlife Sites (LWS).</p> <p>A need to increase the green infrastructure of the District.</p> <p>The fragmentation of habitats.</p>	<p>Will it conserve and enhance natural/semi natural habitats?</p> <p>Will it conserve and enhance species diversity, and in particular avoid harm to indigenous BAP priority species?</p> <p>Will it maintain and enhance sites designated for their nature conservation interest?</p> <p>Will it maintain and enhance the connectivity of habitats, their ability to deliver ecosystem services or their resilience to climate change?</p>	<p>Spatial extent of designated sites within the District.</p> <p>Achievement of Biodiversity Action Plan targets.</p> <p>Ecological potential assessments.</p> <p>Distance from site to nearest:</p> <ul style="list-style-type: none"> SSSIs. NNR. LWS. Ancient Woodland. Protected lanes. Other sensitive designated or non-designated receptors. Other special landscape features. <p>Condition of the nearest sensitive receptors (where viable).</p>

Sustainability objective	Sustainability issues	Indicative appraisal questions	Potential indicators
			<p>Site visit surveys on typical abundance and frequency of habitats (DAFOR scale).</p> <p>Number of % of permitted developments providing biodiversity value e.g. green/brown roof, living wall, native planting.</p>
7) To promote more sustainable transport choices and uptake	<p>Higher car ownership in Braintree District compared to county and national levels.</p> <p>Lack of parking at public transport interchanges, particularly Witham train station.</p> <p>Lack of walking and cycling infrastructure.</p> <p>Lack of public transport infrastructure.</p>	<p>Will it increase and/or improve the availability and usability of sustainable transport modes?</p> <p>Will it seek to encourage people to use alternative modes of transportation other than private vehicle?</p> <p>Will it lead to the integration of transport modes?</p> <p>Will it improve rural public transport?</p> <p>Does it seek to increase the uptake of public transport through parking standards at destinations?</p> <p>Does it seek to increase the uptake or viability of walking and cycling as methods of transportation, through new infrastructure or integration?</p>	<p>Access to services and business' by public transport.</p> <p>Indices of Multiple Deprivation.</p> <p>Travel to work methods and flows.</p> <p>Car ownership.</p> <p>Network performance on roads.</p> <p>Public transport punctuality and efficiency.</p> <p>Length of Public Rights of Way created/enhanced; number of Rights of Way Improvement Plans implemented.</p>
8) Promote accessibility and ensure the necessary transport infrastructure to support new development	<p>Large commuting outflow of Braintree District residents, including to Stansted Airport in Uttlesford District.</p> <p>In-commuters filling jobs in the District.</p> <p>Accessibility of GPs by either walking or using public transport.</p> <p>Accessibility to employment sites and retail centres.</p> <p>Lack of public transport infrastructure.</p> <p>Lack of major roads, and lack of quality in smaller roads.</p>	<p>Will it contribute positively to reduce social exclusion by ensuring access to jobs, shopping, services and leisure facilities for all?</p> <p>Does it seek to concentrate development and facilities in town centres or where access via sustainable travel is greatest?</p> <p>Will it assist in reducing the number of road casualties and ensure ease of pedestrian movement especially for the disabled?</p> <p>Will it improve parking conditions at destinations, particularly for commuters?</p> <p>Does it seek to minimise congestion on key routes and at key destinations /</p>	<p>Residents opinion on availability of open space/leisure facilities.</p> <p>Access to services by public transport.</p> <p>Indices of Multiple Deprivation – sub-domain scores.</p> <p>Recorded traffic flows.</p> <p>KSI casualties for adults and children.</p> <p>Car ownership.</p> <p>Location of site with regards to areas of high deprivation.</p> <p>Transport Assessments.</p>

Sustainability objective	Sustainability issues	Indicative appraisal questions	Potential indicators
		<p>areas that witness a large amount of vehicle movements at peak times?</p> <p>Would the scale of development require significant supporting transport infrastructure in an area of identified need?</p> <p>Will planning controls seek to retain garages to reduce conversion to living space to reduce on-street parking?</p>	
9) To improve the education and skills of the population	<p>4 LSOAs are in the top 5% most deprived nationally in regards to education, skills and training deprivation: 1 in Halstead, 1 in Braintree and 2 in Witham.</p> <p>Lack of highly skilled jobs in the District.</p> <p>Attainment is an issue across all levels.</p>	<p>Does it seek to improve existing educational facilities and/or create more educational facilities?</p> <p>Does it seek to improve existing training and learning facilities and/or create more facilities?</p> <p>Will the employment opportunities available be mixed to suit a varied employment skills base?</p> <p>Will new housing be supported by school expansion or other educational facilities where necessary?</p>	<p>Additional capacity of local schools.</p> <p>GCSE or equivalent performance.</p> <p>Level 2 qualifications by working age residents.</p> <p>Level 4 qualifications and above by working age residents.</p> <p>Employment status of residents.</p> <p>Average gross weekly earnings.</p> <p>Standard Occupational Classification.</p>
10) To conserve and enhance the historic environment, heritage assets and their settings	<p>3,192 designated listed buildings within the District.</p> <p>40 Scheduled Monuments located throughout the District.</p>	<p>Will it protect and enhance heritage assets and their settings?</p> <p>Does it seek to enhance the range and quality of the public realm and open spaces?</p> <p>Will it reduce the amount of derelict, degraded and underused land?</p> <p>Does it encourage the use of high quality design principles to respect local character?</p> <p>Will any adverse impacts be reduced through adequate mitigation?</p>	<p>Number and % of Listed Buildings (all grades), Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, Places of Worship, conservation areas, locally listed heritage assets at Risk</p> <p>% of Conservation Areas with an up-to-date character appraisal</p> <p>% of Conservation Areas with published management proposals</p> <p>Number of historic buildings repaired and brought back into use</p> <p>% of local authority area covered by historic characterisation studies</p> <p>Area of highly sensitive historic landscape characterisation type(s) which</p>

Sustainability objective	Sustainability issues	Indicative appraisal questions	Potential indicators
			<p>have been altered and their character eroded</p> <p>Number of major development projects that enhance the significance of heritage assets or historic landscape character</p> <p>Number of major development projects that detract from the significance of heritage assets or historic landscape character</p> <p>Improvements in the management of historic and archaeological sites and features</p> <p>% change in visits to historic sites</p> <p>% of planning applications where archaeological investigations were required prior to approval</p> <p>% of planning applications where archaeological mitigation strategies (were developed and implemented)</p> <p>Number and extent of street / public realm audits</p> <p>Number of actions taken in response to breach of listed building control</p>
11) To reduce contributions to climatic change	<p>In 2008 Braintree District consumed more energy than the County average, largely associated with road transport.</p> <p>Road transport in Braintree District produces the 3rd highest amount of CO2 per capita across the County's local authorities.</p>	<p>Will it reduce emissions of greenhouse gases by reducing energy consumption?</p> <p>Will it lead to an increased generation of energy from renewable sources?</p> <p>Does it ensure more sustainable modes of travel are provided?</p> <p>Will it encourage greater energy efficiency?</p> <p>Will it improve the efficient use of natural resources, minimising waste and promoting recycling?</p> <p>Will it seek to adhere to the Code for</p>	<p>Carbon Dioxide emissions.</p> <p>Energy consumption GWh/households.</p> <p>Percentage of energy supplied from renewable sources.</p> <p>Code for Sustainable Homes certificates.</p>

Sustainability objective	Sustainability issues	Indicative appraisal questions	Potential indicators
		Sustainable Homes?	
12) To improve water quality and address water scarcity and sewerage capacity	<p>The majority of water bodies within Braintree District are given a 'moderate' current overall potential. However the River Blackwater and the River Chelmer are both given a 'poor' current status.</p> <p>Water scarcity is a major issue in regards to significant development in particular. Sewage capacity.</p>	<p>Will it lead to no deterioration on the quality of water bodies?</p> <p>Will water resources and sewerage capacity be able to accommodate growth?</p> <p>Does it ensure the reinforcement of wastewater treatment works or the provision of alternatives (where required) to support growth?</p>	<p>Percentage of water bodies at good ecological status or potential.</p> <p>Percentage of water bodies assessed at good or high biological status.</p> <p>Percentage of water bodies assessed at good chemical status.</p> <p>Water cycle study capacity in sewerage and resources.</p>
13) To reduce the risk of flooding	<p>Potential for development in Flood Risk Zones</p> <p>Surface water runoff in urban areas</p>	<p>Does it promote the inclusion of Sustainable Drainage Systems (SuDS) in new developments?</p> <p>Does it seek to avoid development in areas at risk of flooding (fluvial, surface water, groundwater)?</p> <p>Does it seek to avoid increasing flood risk (fluvial, surface water, groundwater) in areas away from initial development?</p> <p>Will developer contributions be utilised for the provision and maintenance of flood defences?</p>	<p>Spatial extent of flood zones 2 and 3</p> <p>Residential properties flooded from main rivers</p> <p>Planning permission in identified flood zones granted permission contrary to advice from the Environment Agency</p> <p>Incidences of flooding and location</p> <p>Distance of site to floodplains</p> <p>SFRA results</p> <p>Incidences of flood warnings in site area</p> <p>Distance to 'Areas susceptible to surface water flooding' – EA Maps</p> <p>Number or % of permitted developments incorporating SuDS</p>
14) To improve air quality	<p>The main air quality issues in the District are found to be NO₂ and PM₁₀ emissions from vehicles travelling on the A12 and A120.</p> <p>Meeting National Air Quality Standards.</p> <p>Five potentially significant junctions with a daily flow of greater than 10,000 vehicles (2004) at Newland Street, Witham; Cressing Road, Witham; Head Street, Halstead; Railway Street,</p>	<p>Will it improve, or not detrimentally affect air quality along the A12 or A120?</p> <p>Does it ensure that National Air Quality Standards are met at relevant points?</p> <p>Does it seek to improve or avoid increasing traffic flows generally and in particular through potentially significant junctions?</p>	<p>Number and spatial extent of potentially significant junctions for air quality in the District</p> <p>NO₂ emissions</p> <p>PM₁₀ emissions</p> <p>Recorded traffic flows on A12 and A120</p>

Sustainability objective	Sustainability issues	Indicative appraisal questions	Potential indicators
	Braintree and Rayne Road, Braintree.		
15) To maintain and enhance the quality of landscapes and townscapes	<p>Much of the District's landscape is sensitive to change and new development.</p> <p>Open skylines with panoramic views</p> <p>Strong historic integrity with dispersed historic settlement patterns and Conservation Areas</p> <p>Coalescence between neighbouring settlements and beyond village envelopes</p> <p>Continuation of development on Previously Developed Land (PDL)</p>	<p>Will homes be designed to enhance the existing street scene creating a better cultural heritage & public realm?</p> <p>Will areas of special landscape character be protected?</p> <p>Does it prioritise development on previously developed land over greenfield land?</p> <p>Does it support the positive use and visual enhancement of degraded land or derelict buildings?</p> <p>Will development see a disruption in current field boundaries?</p> <p>Will it lead to rural expansion or development outside development boundaries/limits that increases coalescence with neighbouring settlements?</p> <p>Is the scale / density of development in keeping with the local townscape / landscape?</p> <p>Will it limit light pollution or help to conserve or enhance dark skies?</p>	<p>Developments permitted contrary to Landscape Character Assessment 'sensitivities to change'.</p> <p>Number and extent of field boundaries affected.</p> <p>Development on previously developed land or conversion of existing buildings.</p> <p>Number of permitted developments within Conservation Areas.</p>
16) To safeguard and enhance the quality of soil.	<p>Significant resource of Grade 2 agricultural land in the District.</p> <p>Existence of contaminated sites from legacy industrial uses.</p>	<p>Will it avoid the loss of high quality agricultural land?</p> <p>Will it preventing soil pollution?</p> <p>Will it ensure effective soil protection during construction and development.</p> <p>Will it support the remediation of contaminated land, avoiding environmental pollution or exposure of occupiers or neighbouring land uses to unacceptable health risk?</p>	<p>Area of high quality agricultural land in District.</p> <p>Number or area of contaminated sites remediated.</p>

Appendix 3 – Proposed assessment framework for SA of Site Allocations

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
SA objective 1: Create safe environments which improve quality of life and community cohesion						
ALL ALLOCATIONS Provision or enhancement of dedicated community facilities such as village halls and community centres. Source: BDC site assessment (suitability for, requirements for, relocation of, enhancement to existing).	N/A	Removal of community facilities with no relocation	Suitability for new community facilities where none exist currently; or Enhancement of existing community facilities.	N/A	Existing community facilities remain.	Uncertainty surrounding impacts.
SA objective 2: To provide everyone with the opportunity to live in a decent home						
HOUSING ALLOCATIONS Delivery of affordable housing. Source: BDC site assessment (site potential housing yield); BDC mapping of 'designated rural areas'; applicable affordable housing requirements in Local Plan policy.	N/A	N/A	DESIGNATED RURAL AREAS Allocation of 6-10 dwellings contributes to the delivery of affordable housing in designated rural areas. REST OF DISTRICT No effect.	ALL AREAS OF DISTRICT Allocation of >10 dwellings contributes significantly to the delivery of affordable housing.	No contribution to affordable housing.	Uncertainty surrounding delivery
SA objective 3: To improve the health of the District's residents and mitigate/reduce potential health inequalities						
HOUSING ALLOCATIONS Distance to nearest NHS GP surgery or hospital. Source: GP surgeries - BDC to supply or	N/A	Distance > 800 m	Distance <= 800 m	N/A	N/A	Uncertainty

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<p>obtain from OS AddressBase Premium digital dataset showing GP surgeries</p> <p>Hospitals: BDC to provide list of names and addresses.</p>						
<p>HOUSING ALLOCATIONS</p> <p>Distances to publicly accessible natural greenspace (ANG), including country park, woodland, grassland, river or canal bank, as per Natural England ANG Standards (ANGSt):</p> <p><= 300m from ANG of at least 2 ha in size</p> <p><= 2 km from ANG of at least 20 ha</p> <p><= 5 km from ANG of at least 100 ha</p> <p><= 10 km from ANG of at least 500 ha</p> <p>Source: digital data showing publicly accessible open spaces (BDC)</p>	N/A	None or one of ANGSt criteria met	Three or more of ANGSt criteria met	N/A	Two of ANGSt criteria met	Uncertainty
<p>ALL ALLOCATIONS</p> <p>Net increase or loss of publicly accessible open space (including recreation space and allotments).</p> <p>Source: digital data showing publicly</p>	N/A	Loss	No loss	Provision of new	N/A	Uncertain impacts

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
accessible open spaces (BDC) + BDC site assessment						
SA objective 4: To promote the vitality and viability of all service centres throughout the District						
<u>ALL ALLOCATIONS</u> Net increase or loss of retail provision on the site. Source: BDC site assessment	N/A	Loss	Increase	N/A	No change	N/A
<u>HOUSING ALLOCATIONS</u> Distances to local shops and services Source: digital data showing primary shopping area and Local Centre boundaries (BDC)	N/A	<u>Allocations to 3 Main Towns</u> > 800 m from a primary shopping area or Local Centre boundary (represents 10 mins walking distance) <u>Allocations elsewhere (i.e. to Key Service Villages, other villages, settlements not identified in the settlement hierarchy)</u> > 8 km from a Local Centre boundary (represents 10 mins driving distance)	<u>Allocations to 3 Main Towns</u> <= 800 m from a primary shopping area or Local Centre boundary (represents 10 mins walking distance) <u>Allocations elsewhere (i.e. to Key Service Villages, other villages, settlements not identified in the settlement hierarchy)</u> <= 8 km from a Local Centre boundary (represents 10 mins driving distance)	Extension of primary shopping areas/ Local Centres or identified regeneration	N/A	N/A
SA objective 5: To achieve sustainable levels of prosperity and economic growth						
<u>ALL ALLOCATIONS</u> Sterilisation of mineral reserves Source: sites identified as preferred and reserved for primary mineral extraction in	Significant proportion of allocated land (>= 25%) on site preferred and reserved for mineral extraction	N/A	N/A	N/A	All other sites	N/A

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
the Essex Minerals Plan, 2014						
HOUSING ALLOCATIONS Distances to main employment areas (B1, B2, B8) Source: digital data showing main employment areas (BDC)	N/A	> 800 m from existing employment area Or Loss of employment site	<= 800 m from existing employment area Or Addition of employment site	N/A	N/A	N/A
ALL ALLOCATIONS Broadband availability Source: http://www.superfaste.ssex.org/en-us/maps.aspx	N/A	N/A	Non-fibre broadband upgrade planned, delivering download speeds of 2-24 Mbps by 2016	Fibre available or planned within Plan period	No work currently planned but download speeds of 2 Mbps should be available by 2016 (should be all of District other than upgrade categories)	N/A
SA objective 6: To conserve and enhance the biological and geological diversity of the environment						
ALL ALLOCATIONS Distances (impacts on) to: internationally (SAC, SPA, Ramsar), nationally (SSSI, NNR) or locally (LWS, LNR) designated wildlife site or Ancient Woodland. Source: digital data showing internationally (LUC), nationally (LUC), and locally (BDC) designated wildlife sites.	Significant negative effect (--) if significant proportion of allocated land (>= 25%) lies within designated site. Or Significant effect with uncertainty (---?) if significant proportion of allocated land (>= 25%) lies within a SSSI's Impact Risk Zone for the relevant type of development. Effects will be assumed to apply to both the SSSI and any internationally	Significant proportion of allocated land (>= 25%) is on undesignated greenfield land. Or Allocated site is <= 100 m from a designated site (other than internationally designated or SSSI which will be assessed on basis of Impact Risk Zones - see significant negative effects column).	N/A	N/A	All other allocations.	N/A

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
	<p>designated site overlaying it. Uncertainty relates to whether potentially significant negative effects can be mitigated.</p> <p>Or</p> <p>Significant effect with uncertainty (--) if smaller part of allocated land (< 25%) lies within designated site. Uncertainty relates to whether significant adverse effects can be avoided by layout of development within the site boundary.</p>					
SA objective 7: To promote more sustainable transport choices and uptake						
<u>ALL ALLOCATIONS</u> Loss of / creation of new footpaths or cycleways or improvements to existing. Source: BDC site assessment + PROW data (BDC).	N/A	Loss of public footpath or cycleway	Creation of new public footpaths or cycleways; or improvements to existing	N/A	Diversion of public footpath / cycleway or no loss	Impact unknown
<u>HOUSING AND EMPLOYMENT ALLOCATIONS</u> Distance to public transport. Source: digital data showing bus stops and railway stations (BDC to supply or obtain	N/A	> 400 m from a bus stop And > 800 m from a railway station	<= 400 m from a bus stop or <= 800 m from a railway station	Provision of a new bus stop or public transport hub	N/A	N/A

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
from bus company) <i>N.B. See methodology chapter for assumed new bus service provision in large new housing developments.</i>						
SA objective 8: Promote accessibility and ensure the necessary transport infrastructure to support new development						
HOUSING AND EMPLOYMENT ALLOCATIONS Is the allocation within or directly adjacent to a settlement that has a high level of provision of services and facilities, as identified by the Local Plan settlement hierarchy? Source: Local Plan. <i>* Settlement hierarchy shown is per the adopted Core Strategy – to be reviewed once the new hierarchy is defined by the new Local Plan.</i>	Allocation to the open countryside.	Allocation to other settlements not identified in the settlement hierarchy (e.g. hamlets/ no development boundary).*	Allocation to KEY SERVICE VILLAGES* Coggeshall, Earls Colne, Hatfield Peverel, Kelvedon, Sible Hedingham, Silver End.	Allocation to MAIN TOWNS* Braintree, Bocking and Gt Notley; Witham; Halstead.	Allocation to other villages (as set out in the Core Strategy settlement hierarchy).*	N/A
HOUSING AND EMPLOYMENT ALLOCATIONS Distance to and regularity of public transport. Source: digital data showing bus stops and routes served (BDC to obtain from bus company) +	N/A	> 400 m from a bus stop And > 800 m from a railway station	<= 400 m from a bus stop or <= 800 m from a railway station providing a seven day per week service	<= 400 m from a bus stop or <= 800 m from a railway station providing a frequent service (>=1 per hour, at least 5 days per week)	N/A	<= 400 m from a bus stop or <= 800 m from a railway station with unknown service frequency

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
timetables per bus company website <i>N.B. See methodology chapter for assumed new bus service provision in large new housing developments.</i>						
HOUSING AND EMPLOYMENT ALLOCATIONS Highways access information. Source: BDC site assessment.	N/A	Highway access issues identified.	No highway access issues identified.	N/A	N/A	No highway access information in SHLAA.
SA objective 9: To improve the education and skills of the population						
HOUSING ALLOCATIONS Distance to a primary school. Source: digital data showing primary schools (BDC). <i>N.B. See methodology chapter for assumed new school provision in large new housing developments.</i>	N/A	> 800 m	<= 800m , > 400m	<= 400 m	N/A	Uncertainty
HOUSING ALLOCATIONS Distance to a secondary school. Source: digital data showing secondary schools (BDC). <i>N.B. See methodology chapter for assumed new school provision</i>	N/A	> 4.8 km	<= 4.8km, > 2.4km	<= 2.4 km	N/A	Uncertainty

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<i>in large new housing developments.</i>						
SA objective 10: To conserve and enhance the historic environment, heritage assets and their settings						
HOUSING AND EMPLOYMENT ALLOCATIONS BDC to: - Identify heritage assets on or close to the site - Assess the contribution of the site to the significance of the heritage assets - Identify the potential impacts of development on the significance of heritage assets - Consider how any harm might be removed or reduced, including reasonable alternatives sites - Consider how any enhancements could be achieved and maximised - Consider and set out the public benefits where harm cannot be removed or reduced Source: BDC officer judgement based on site visit, reference to digital mapping of designated heritage assets, and Essex Heritage At Risk Register.	Loss of or considerable harm to significance of designated heritage asset or its setting, where mitigation is unlikely to be feasible.	Harm to significance of designated heritage asset or its setting where mitigation is likely to be feasible, for example via design and layout of the new development.	Development likely to enhance historic asset, for example by bringing an 'at risk' structure into appropriate use or improving a degraded setting.	N/A	No effect (assume in all cases where there is no designated historic asset within 1 km of allocation).	Uncertainty

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
SA objective 11: To reduce contributions to climate change						
More appropriately assessed on basis of the features and designs of individual development proposals.	N/A	N/A	N/A	N/A	N/A	N/A
SA objective 12: To improve water quality and address water scarcity and sewerage capacity						
ALL ALLOCATIONS Groundwater Source Protection Zone (SPZ). Source: SPZs (LUC has this at 1:50k but BDC to provide if they hold larger scale data).	N/A	Allocation falls within SPZ1 or SPZ2	N/A	N/A	Allocation does not fall in any SPZs	Allocation falls within SPZ3
HOUSING ALLOCATIONS Capacities in sewage network. Source: Sewerage Network Constraint Mapping within Water Cycle Study (BDC). <i>N.B. Criteria shown are based on Water Cycle Study (WCS) Stage 2 Report 2011; to be updated once addendum to this report is completed.</i>	N/A	N/A	N/A	N/A	AS PER CHAPTER 12 'SEWERAGE NETWORK CAPACITY' IN THE WCS Site is in a key village or below in the Settlement Hierarchy ('AWS confirm that the relatively low scale of the proposed growth at the key service villages is unlikely to require significant upgrades to the network.')	AS PER CHAPTER 12 'SEWERAGE NETWORK CAPACITY' IN THE WCS Limited to those sites identified in 12.2 of the WCS (Northern and western extents of Bocking, central and eastern areas of Braintree, the proposed employment site at Great Notley, the majority of the proposed sites within Halstead, and sites in the northeast and southwest extents of Witham.)
SA objective 13: To reduce the risk of flooding						
ALL ALLOCATIONS Sites within an area of high flood risk.	Significant proportion of allocation (>=25%) is within Flood Zone 3a or 3b or a Critical	Significant proportion of allocation (>=25%) is within Flood Zone 2 or smaller area (5%	N/A	N/A	< 5% of allocation within Flood Zone 3/ Critical Drainage Area, or < 25% within Flood	Uncertainty

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
Source: digital data showing high flood risk locations (BDC). <i>N.B. Criteria shown to be reviewed once Addendum to Mid Essex SFRA and Essex CC Surface Water Management Plan become available.</i>	Drainage Area and proposed use is not classified as appropriate to the Zone by Technical Guidance to the NPPF.	to < 25%) is within Flood Zone 3 or a Critical Drainage Area and proposed use is not classified as appropriate to the Zone by Technical Guidance to the NPPF.			Zone 2, or proposed use is classified as appropriate to the Zone by Technical Guidance to the NPPF.	
SA objective 14: To improve air quality						
<u>ALLOCATIONS FOR HOUSING OR OTHER SENSITIVE USES (e.g. hospital, school, childcare)</u> Location within an area likely to have poor air quality. Source: digital data showing AQMAs (currently none in District but BDC to provide boundaries if any are designated in the future) and road corridors (LUC).	Significant negative effect with uncertainty (--) assumed where significant proportion of allocation (>= 25%) is: a) within an AQMA (if any are designated in the future), or b) <= 200 m from the A12 or A120. Uncertainty relates to whether mitigation will; be possible through layout of development.	N/A	N/A	N/A	All other allocations.	N/A
SA objective 15: To maintain and enhance the quality of landscapes and townscapes						
<u>ALL ALLOCATIONS</u> High sensitivity to change per the Landscape Character Assessment (LCA). Source: Landscape Character Assessment report (BDC).	High sensitivity to change.	Moderate sensitivity to change.	Low sensitivity to change.	N/A	N/A	Unknown sensitivity to change.

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<i>N.B. LCA 2006 is in the process of being updated</i>						
ALL ALLOCATIONS Proposed extension to Dedham Vale AONB. Source: digital data showing extent of proposed extension (BDC).	Significant effect with uncertainty (--) where allocation is within proposed extension to Dedham Vale AONB. Uncertainty relates to whether all of the proposed extension area meets the criteria for AONB designation.	N/A	N/A	N/A	N/A	N/A
ALL ALLOCATIONS Greenfield site or Previously Developed Land (PDL). Source: BDC site assessment.	N/A	Greenfield land.	PDL.	Degraded landscape or derelict buildings and BDC confirm that remediation will be a condition of development.	N/A	Unknown whether greenfield or PDL.
ALL ALLOCATIONS Visually Important Spaces. Source: digital data showing Visually Important Spaces (BDC).	N/A	Allocation is located in Visually Important Space, as identified by BDC and Parish Councils.	N/A	N/A	Allocation is not located on identified Visually Important Space.	Unknown whether Visually Important Space.
ALL ALLOCATIONS Country parks. Source: digital data showing country parks (LUC).	N/A	Development allocation is located in a country park.	Enhancement of an existing country park	Provision of a new country park	Development allocation is not located on a country park.	N/A
SA objective 16: To safeguard and enhance the quality of soil						
ALL ALLOCATIONS Loss of good quality agricultural land Source: digital data showing agricultural land classification	Significant proportion of allocated land (>= 25%) on grade 1 or 2 agricultural land	Significant proportion of allocated land (>= 25%) on grade 3 agricultural land	N/A	N/A	All other sites	N/A

Site assessment criteria	Significant negative effect (–)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
(LUC)						
<u>ALL ALLOCATIONS</u> Remediation of contaminated land Source: digital data showing contaminated land (BDC)	N/A	Land is contaminated but remediation will not be a condition of development.	N/A	Land is contaminated and BDC confirm that remediation will be a condition of development.	N/A	Unknown whether land is contaminated or if remediation will be required.

Essex County Council and Southend-on-Sea Replacement Waste Local Plan consultation June 2015		Agenda No:7
Corporate Priority: Securing appropriate infrastructure and housing growth Portfolio: Planning and Housing Report Presented by: Alan Massow Report prepared by: Alan Massow		
Background Papers: <ul style="list-style-type: none"> • National Planning Policy Framework (NPPF) • National Planning Practise Guidance (NPPG) • National Planning Policy for Waste (2014) • Waste Capacity Gap Report (2014) • Replacement Waste Local Plan (2015) • Essex County Council Waste Local Plan (2001) • Waste Management Plan for England (2013) • Braintree District Council Adopted Local Plan Review (2005) 		Public Report: Yes
Options: To approve/amend or not approve the proposed response to the Essex County Council Replacement Waste Local Plan.		Key Decision: No
Executive Summary: <p>Essex County Council and Southend-on-Sea Borough Council have agreed to plan jointly on waste matters, through the preparation of a new joint Waste Local Plan. Once adopted, the Plan will supersede the current Waste Local Plan from 2001.</p> <p>The Replacement Waste Local Plan will set a strategy for waste development to 2032. Once adopted the Plan will safeguard existing waste capacity, allocate sites suitable for waste facilities, and include policies for the management of future waste development.</p> <p>Two sites in the District (Cordons Farm near Galleys Corner, and the Rivenhall Airfield site) have been identified for allocation. Cordon's Farm is proposed for allocation for municipal waste management which reflects its current permission. Rivenhall Airfield is identified as an opportunity site to provide additional waste management.</p> <p>Seven other sites in the District have been identified as having potential for future waste management facilities and are referred to as "Areas of Search". A number of other small scale existing facilities are also highlighted.</p> <p>The consultation is for 6 weeks and concludes on the 30th July 2015.</p>		
Decision: That the comments outlined in section 8 of this report are submitted as the Braintree District Council response to the consultation on the Replacement Waste Local Plan.		

Purpose of Decision: To agree the Council's response on the Replacement Waste Local Plan.	
Corporate implications	
Financial:	Costs associated with the collection of household waste, and potential increase in cost if additional collections required.
Legal:	The Council is the waste collection authority with responsibility for the collection of municipal waste.
Equalities/Diversity	N/A
Safeguarding	N/A
Customer Impact:	Proposals will impact on residents.
Environment and Climate Change:	The transportation, collection and disposal of waste can have significant implications for the environment. The consultation document proposes to reduce impact on the environment and reduce greenhouse gas emissions. The document is subject to Sustainability Assessment and Strategic Environmental Assessment.
Consultation/Community Engagement:	This consultation is for 6 weeks concluding on the 30 th July 2015.
Risks:	That the replacement waste plan is found unsound, which could delay the provision of adequate waste facilities.
Officer Contact:	Alan Massow
Designation:	Senior Policy Planner
Ext. No.	2577
E-mail:	alan.massow@braintree.gov.uk

1. Background

1.1 Essex County Council and Southend-on-Sea Borough Council are in the process of preparing a joint Replacement Waste Local Plan. Once approved this document will replace the Essex and Southend Waste Local Plan (2001) which is currently used for determining waste planning applications.

1.2 The Replacement Waste Local Plan will outline a strategy for waste related development up until 2032. It will safeguard existing waste capacity, allocate suitable sites for waste facilities as well as include policies on land use and generic policies for the management of future waste development.

1.3 The Replacement Waste Local Plan is currently out for a six week consultation, concluding on the 30th July 2015.

1.4 The full document and appendix is available at; <http://bit.ly/1fAi4wS>

2. Overall Spatial Strategy

2.1 The waste planning authorities are intending to plan on the basis of net self-sufficiency where practicable, in their waste management by 2032. The majority of new waste development should be directed toward key urban

areas of Basildon, Chelmsford, Colchester, Harlow and Southend-on-Sea. These are considered to be the main population centres, and will enable the management of waste to take place close to its source. The waste planning authority will continue to rely on a network of strategic waste management facilities which manage Local Authority Collected Waste arising in the plan area. The primary waste management facility is located at Tovi Eco Park in Basildon, but is supported by a network of local authority collected waste transfer stations such as the site at Cordon's Farm.

2.2 The Waste Plan states that the inclusion of flexible policies in the plan will enable the provision of additional sites if needed beyond the preferred site allocations.

2.3 If it is appropriate to do so, the co-location of facilities on existing waste management sites will be supported. Opportunities to support sustainable waste practices including the use of waste as a resource will be supported through working with the Local Planning Authority.

3. Future Waste Capacity

3.1 Essex along with Southend does not have sufficient capacity at its existing waste management facilities to secure the maximum recovery of waste through methods such as recycling and composting. More facilities will be needed to enable a sustainable approach to waste management up to 2032. Landfill (including landraising) is the least preferred method of waste management.

3.2 The Waste Capacity Gap Report (2014) identified the likely level of capacity required for different types of waste, this is as follows;

- Up to 309,000 tonnes per annum of biological treatment capacity for non-hazardous organic waste;
- Up to 1.27 million tonnes per annum for the recovery (recycling) of inert waste;
- Up to 256,000 cubic meters per annum for the disposal of inert waste to landfill; and
- Up to 50,000 tonnes per annum of capacity for the disposal of stable non-reactive hazardous waste.

3.3 The figures above are a minimum and for the whole of Essex and Southend-on-Sea, but they do factor in cross boarder use of waste facilities.

3.4 It should also be noted that a reduced capacity for London waste is factored in to these figures, as the London Plan is seeking to deal with its own waste needs.

4. Site Assessments and Preferred Site Allocations

- 4.1 Two sites in Braintree District have been identified as preferred site allocations. They are Cordons Farm (W34) for municipal waste management, and the Rivenhall Site (IWMF2) as an opportunity site to provide additional waste management capacity.
- 4.2 Essex County Council appointed independent consultants to develop a methodology to be used in the selection of preferred site allocations. This included a site map showing the extent of the site, and its area. Other criteria include groundwater vulnerability, landscape nature and historic designations, traffic and transport, proximity to sensitive receptors, and planning background among other considerations.
- 4.3 The Cordons Farm site has the benefit of planning permission from the Waste Authority under permission 13/00576/ECC – Waste Management facility for the transfer/bulking of municipal waste. The Council had concerns at the time of the application, regarding traffic impact and noise but were satisfied that the proposal was sufficient to address those concerns. Any additional waste management capacity that this site would need to satisfy both residential amenity impact and traffic impact.
- 4.4 The Rivenhall site has permission under 08/01760/MIN for the development of an integrated Waste Management Facility comprising an anaerobic digestion plant, materials recovery facility, mechanical biological treatment facility, paper pulping recycling facility, and a combined heat and power plant. This permission has recently been extended under permission 14/01096/MIN for a two year period up to 2017. The permission has not been implemented. The Waste Plan indicates that the site would be used for materials recovery, mechanical biological treatment, energy from waste – combined heat & power, and anaerobic digestion/biogas. All of these facilities would be enclosed.
- 4.5 The Council had objections to development on the Rivenhall site when the application was determined, which included concerns of the intensification of industrial activity in the countryside, lack of need, that it wasn't in the Waste Plan, increased traffic movements, impact on the rural qualities of rural areas, loss of agricultural land, environmental issues such as the impact on neighbours, and the impact on public rights of way in the area. It is likely that any proposals for further capacity at this site or for changes to the uses on the site would raise similar concerns. Also a grade 1 listed building (Holy Trinity Church Bradwell) is within 250m of the sites access road.

5. Areas of Search

- 5.1 The Replacement Waste Plan has identified seven sites within Braintree District which it thinks has potential for the delivery of waste management facilities and these are referred to as "Areas of Search". An "Area of Search" encompasses a particular area within which a suitable waste management facility could be delivered. This approach allows areas to be identified where

facilities could come forward as required, rather than a direct allocation.

5.2 It should be noted that Springwood Industrial Estate and Broomhills Industrial Estate have been included as one site rather than two separate sites.

5.3 In total 28 sites were assessed in the District. The suitability of a site as an “Area of Search” was assessed through a 4 stage process.

5.4 The first stage was that the site had to be over 0.65 hectares in size. Any site below this threshold was eliminated. Stage 2 was an assessment of safeguarding issues such as the acceptability of the access, proximity to Natura 2000 site, Flood Zones, and the proximity to sensitive receptors (such as residential uses). If the total area available once it was reduced was over 3 hectares then the site was acceptable. Stage three was an assessment of any other issues which could result in exclusion such as occupancy of the site. Lastly an assessment of the amount of suitable land available remained and whether it was over 0.65 hectares. If all of these stages are satisfied then the site is shortlisted as a proposed area of search.

5.5 The following sites have been identified as meeting the assessment criteria;

- Blue Bridge Industrial Estate (Halstead);
- Earls Colne Airfield (Nr Earls Colne);
- Eastways – Crittall Road – Waterside Park (Witham);
- Freebournes Industrial Estate (Witham);
- Skyline 120 (Great Notley);
- Springwood Industrial Estate – Broomhills Industrial Estate (Braintree);
- Sturmer Industrial Area (Haverhill business Park Nr Sturmer);

5.6 All of the sites identified are allocated for employment uses in the Local Plan (2005) and are within development boundaries.

5.7 The conclusion for each site set out the suitability of each site for a particular waste management development. It also acknowledges that some sites are allocated for employment which does not necessarily include waste development.

5.8 For the Bluebridge Industrial Estate, it states that the potential exists for enclosed thermal and open air waste management facilities particularly in the north and north east of the site.

5.9 For Earls Colne Airfield the majority of the site is suitable for waste management facilities, other areas are more constrained and would only be suitable for enclosed waste facilities only.

5.10 Eastways in Witham is deemed suitable for enclosed waste management facilities as is Freebournes Industrial Estate.

- 5.11 Skyline 120 in Braintree could be suitable for enclosed waste management however as most of the area is within 250m of sensitive receptors, then it would not be suitable for enclosed thermal and open air waste management.
- 5.12 For Springwood Drive/Broomhills, there is an error in the document where half of the concluding paragraph is missing, which makes the outcome unclear. Officers have requested the missing information from Essex County Council.
- 5.13 For Sturmer Industrial estate, two thirds of the site would meet necessary social and environmental criteria for enclosed waste management facilities.
- 5.14 The nature of waste uses is very similar to general employment uses, and as such would be suitable for most of the employment sites listed above. Uses of a waste nature have been granted permission on Blue Bridge Industrial Estate in Halstead for an anaerobic digestion facility (13/00769/ECC), and Springwood Drive in Braintree and Perry Road Witham, have municipal waste disposal sites. Any planning permissions submitted on these sites would be subject to the usual planning considerations such as noise and transport etc.
- 5.15 In terms of specific sites, Skyline 120 in Braintree currently has an outstanding planning application for the development of the remainder of the site for employment uses. If approved would likely prevent waste development taking place, unless it was an enclosed facility utilising an existing building. Broomhills Industrial Estate is closely bounded by residential development, and if it were assessed on its own it is less likely to meet the necessary criteria for site selection.

6. Proposed, objectives and policies

6.1 The Plan has proposed eight strategic objectives (SO). They are as follows;

- SO1 - To work with partner organisations, including District, Borough and City Councils, the Waste Disposals Authorities, Waste Collection Authorities, the Environment Agency, the waste industry, the business sector and voluntary organisations to promote and maximise waste prevention measures amongst all waste producers, both from the business sector as well as consumers.
- SO2 – To support an increase in the proportion as well as the quantity of waste that is re-used, recycled and recovered within the Plan area to meet local targets for recycling and recovery;
- SO3 - To safeguard and encourage opportunities to enhance existing strategic waste infrastructure at sites that serve the Plan area;
- SO4 – To achieve and therefore continue to deliver net self-sufficiency in waste management by 2032, where practicable, with an associated reduction in the amount of waste from

London that is disposed of in the Plan area as set out in the London Plan 2015;

- SO5 – To make provision for suitable site allocations to meet the predicted need for new waste management facilities, and ensure flexibility through the inclusion of areas of search and criteria-led locational policies;
- SO6 – To support the reduction of greenhouse gas emissions, primarily by moving waste up the hierarchy to minimise the need for landfill, and by minimising waste transport by locating new waste facilities in proximity to key growth centres.
- SO7 – To maximise opportunities for sustainable economic growth through the co-location of waste facilities within non-waste development and by encouraging the use of waste as a resource, including assessing its potential as a source of heat and energy.
- SO8 – To ensure waste facilities, and their proposed locations, are sustainably designed, constructed and well operated to reduce potential adverse effects on human health, amenity and the environment, in line with national standards and regulations.

6.2 The document sets out nineteen preferred approaches, which are used to set out the overall strategic approach for the Plan and for the determination of planning applications. Each preferred approach is outlined below;

- Preferred approach 1 – Need for waste management facilities- outlines the targets for the provision of various waste types which will need to be provided over the plan period. The information is taken from the 2014 Waste Capacity Gap (2014).
- Preferred approach 2 – Safeguarding and Waste Consultation Zones – this safeguards strategic sites, non-strategic allocations, and waste transfer stations. Sites which have planning permission that has lapsed but which are considered desirable for waste management will remain safeguarded. It also sets out waste consultation zones, where a Local Planning Authority should consult the Waste Planning Authority, on non-waste applications.
- Preferred approach 3 – Strategic Site Allocations: Local Authority collected waste - allocates sites which are considered essential for ongoing operations. It ensures their continued use, and if needed re-configuration or intensification subject to other policies in the plan. This includes the Cordons Farm site.
- Preferred approach 4 – Strategic Site Allocations: Biological treatment - this covers the strategic site allocations for biological treatment. The Rivenhall site is include on the supporting map and reflects the sites current planning permission.

- Preferred approach 5 – Strategic Site Allocations: Inert waste recycling.
- covers strategic allocations for inert waste recycling. It allocates sufficient sites considered suitable for the recycling of inert waste to meet identified shortfall in capacity.
- Preferred approach 6 – Opportunity Site Allocations: Additional built waste management facilities. - this allocates reserve sites to divert waste away from landfill including the Rivenhall site.
- Preferred approach 7 – Strategic Site Allocations: Inert Landfill. - allocates sites for landfilling of inert waste. No sites are proposed for allocation in the District. However it should be noted that sites allocated in the Mineral Local Plan 2014, the need for landfill capacity is considered to supersede considerations for low level restoration.
- Preferred approach 8 – Strategic Site Allocations: non Hazardous Landfill. - Covers strategic allocations for non-hazardous landfill. No such sites are proposed in the district.
- Preferred approach 9 – Strategic Site Allocations: Stable non-reactive hazardous waste landfill - Details strategic site allocations for stable non-reactive hazardous waste landfill. It would allow for proposals for new landfill on non-allocated sites if they were able to demonstrate a need for a facility and demonstrate compliance with relevant locational criteria. It would need to demonstrate it was suitable than the allocated site. Picture 8 which follows on from this approach, show two sites in the vicinity of Shalford and Beazley End. As far as the Council is aware these sites are historic landfill sites which are no longer in operation, and land at Woolmers Farm which has now been remediated.
- Preferred approach 10 – Landraising - covers the issue of Landraising. Landraising is similar to landfill except that it takes place at ground level. Landraising for its own sake is not permitted, however it could be acceptable under limited circumstances including if it were part of essential engineering project, and where there is a proven benefit that outweighs any harm caused by the proposal. It is also necessary to demonstrate need.
- Preferred approach 11 – Area of Search – this approach designates areas of search around suitable employment sites which are defined in Local Plans. This allows the Plan flexibility in delivery new waste facilities rather than by direct allocation.
- Preferred approach 12 – Locational criteria for enclosed waste facilities - outlines the approach for providing enclosed waste facilities with the preference being for allocated sites, the sites within “Areas of Search”. If proposals can’t be delivered in these locations then a list of appropriate site types is provided.

- Proposed approach 13 – Locational criteria for open facilities. - outlines the approach for provide open waste facilities. As with previous approaches this approach seeks provision on identified sites, then areas of search, and other waste type land uses or farm buildings. Proposals will be assessed on merit.
- Proposed approach 14 – Locational criteria for intermediate, low and very low level radioactive waste facilities - covers criteria for intermediate, low and very low level radioactive waste facilities. These will only be allowed within the Nuclear Licensed Areas at Bradwell.
- Proposed approach 15 – Locational criteria for landfill - covers locational criteria for landfill on non-allocated sites. Again the preference is for allocated sites. Non-allocated sites could come forward if they were necessary to deal with non-hazardous waste arising in the Plan area from the principle of net self-sufficiency.
- Proposed approach 16 – Mitigating & Adapting to Climate Change - outlines the approach to reduce climate changes impacts while adapting to its effects, including avoiding development in areas of flood risk.
- Proposed approach 17 – Transportation of Waste - covers the transportation of waste. It prioritises transportation by rail and water, then sites with access to the main road network. However it is recognised that there are limited opportunities for rail and water and as such it is likely that the majority of waste would be transported by road. Rail transportation of waste in the district is unlikely due to limitations in the local rail network and a lack of
- Proposed approach 18 – General Considerations for all waste management development proposals - outlines the criteria for the determination of waste planning applications.
- Proposed approach 19 – Mining of Waste - covers the mining of waste, which is only appropriate when a site is demonstrably a danger to human health or the environment, and/or it is necessary to facilitate major infrastructure proposals.

6.3 Preferred approaches 16 to 19 are considered to be a reasonable approach to the determination of waste applications. However, for preferred approach 17 – Transportation of Waste, whilst it does touch on the issues of traffic impacts, it should be more prominent in the policy, and include reference for the need for transport assessments. For preferred approach 18, reference should be made on the potential impact of new waste facilities on airfields.

7. Next Steps

7.1 The Replacement Waste Local Plan consultation finishes on the 30th July 2015.

7.2 Once this consultation has completed, it is expected that the pre-submission consultation will happen in November to December 2015, with a view to submission in March 2016. The examination will take place in June 2016 with adoption in December 2016.

8. Recommendation

It is RECOMMENDED that the following comments/objections are submitted to Essex County Councils Replacement Waste Local Plan consultation.

1. Objection to the intensification of uses at the Rivenhall Site (IWMF2) - for additional waste management capacity on the grounds of;
 - Intensification of industrial activity in the countryside;
 - Environmental impacts on the countryside and local residents including light pollution and noise;
 - Impact on local lanes and the A120;

The Council has previously objected to the use of this site for waste management facilities. Whilst the site now has the benefit of planning permission, and an extension of time was allowed in 2014, any additional development could impact on the landscape and environment, as well as the local road network. Also as the site has not been developed it raises the question as to whether or not it is deliverable. This is further supported by the Site Assessment and Methodology report assessment for this site which shows that the land owner is unknown. The site access road is also within 250m of a Grade 1 listed building, which is not identified in the site assessment.

2. Springwood Industrial Estate and Broomhill Industrial estate are two separate employment areas and should be treated as such. Broomhills is unlikely to be suitable for waste facilities due to the close proximity of residential areas. Residential development is within 100m, and a significant proportion is within 250m.
3. Preferred Approach 17 – Transportation of Waste – Impact of proposals on the local transport network, whilst referenced, it should be more prominent and contain reference to proposals being supported by a transport assessment and travel plan.
4. Preferred Approach 18 - General Considerations for all waste management development proposals - reference should be made on the potential impact of new waste facilities on operational airfields e.g. increased risk of bird strike.

5. Picture 6 and 7 show the Rivenhall site as existing and under construction when it is not.
6. Picture 8 shows two sites to the north of Braintree as inert existing and under construction landfills. This is not the case as the historic landfills are closed and land at Woolmer's farm has been remediated.
7. As the Council has not seen any of the maps prior to the consultation, it would be helpful if the sites shown could be specifically listed in the document to aid in their identification.
8. Any further technical comments are delegated to officers.

Appendix 1 – Map of sites – Proposed allocations

Appendix 2 – Map of sites – Areas of Search

Appendix 3 – Map of sites – Picture 6, Picture 7, Picture 8

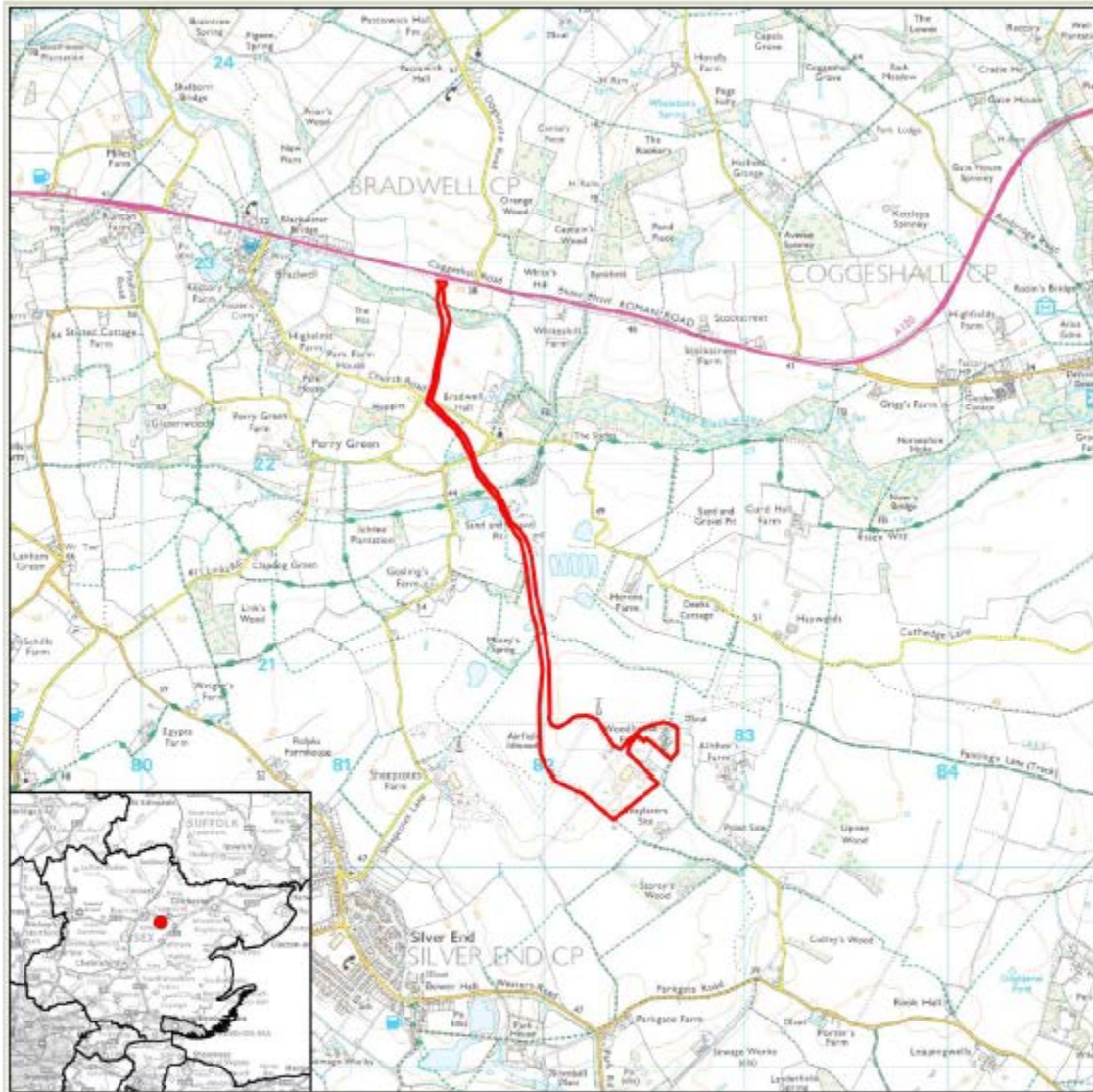
Appendix 1 Map of Sites – Proposed allocations

Reference: IWMF2

District:

Braintree

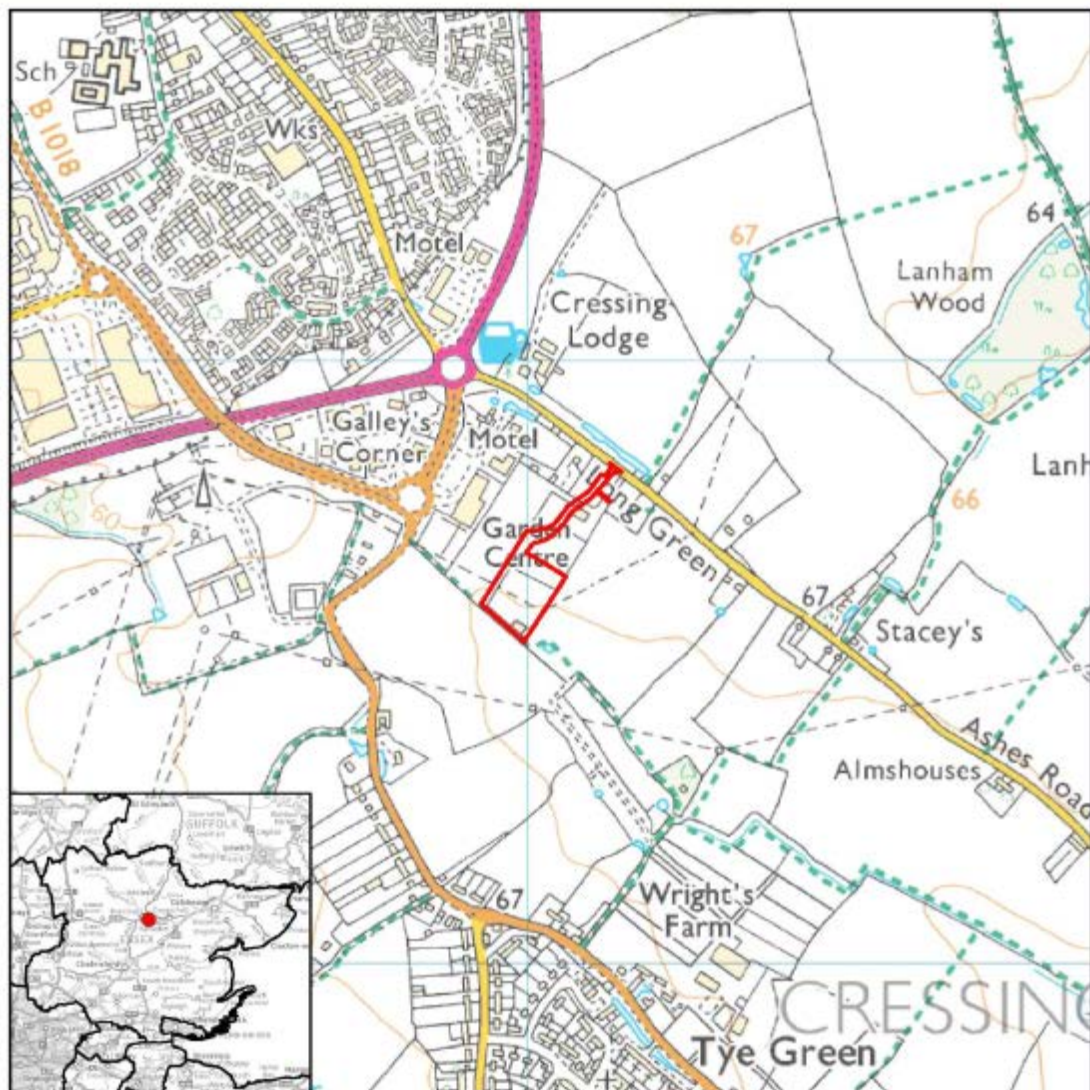
Site Name: IWMF Rivenhall



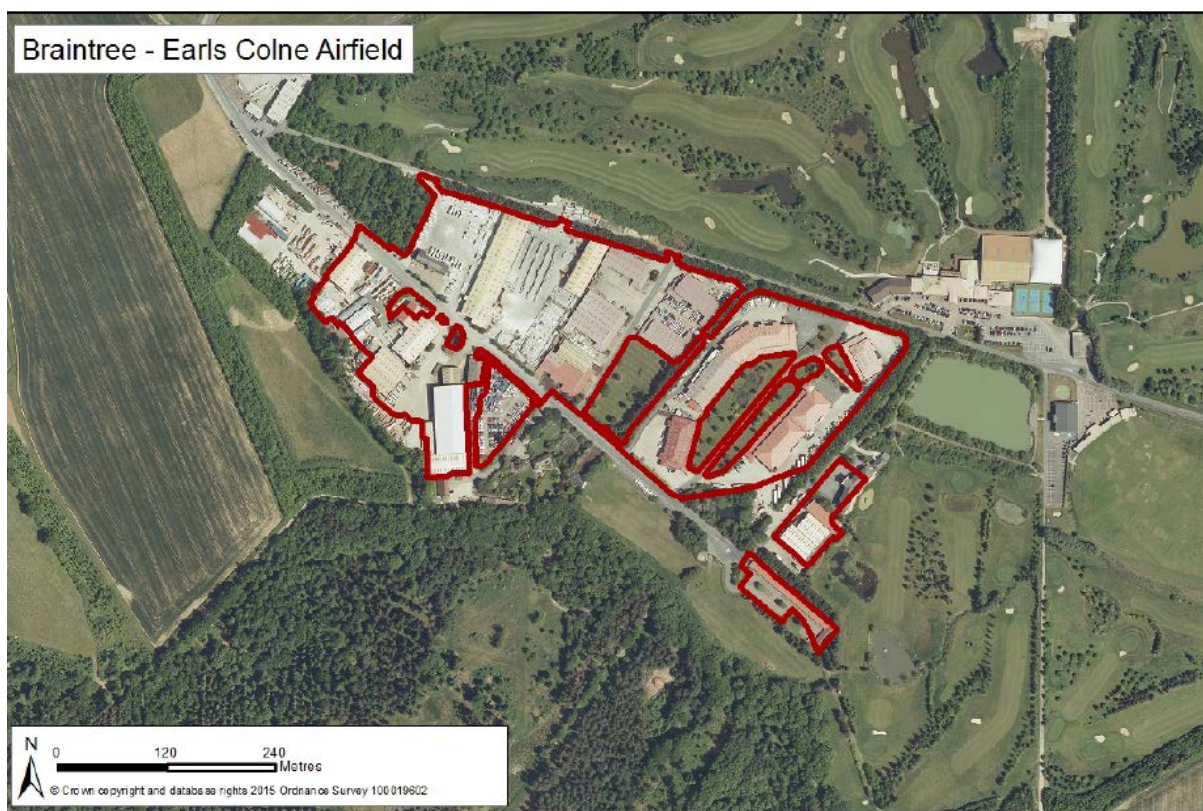
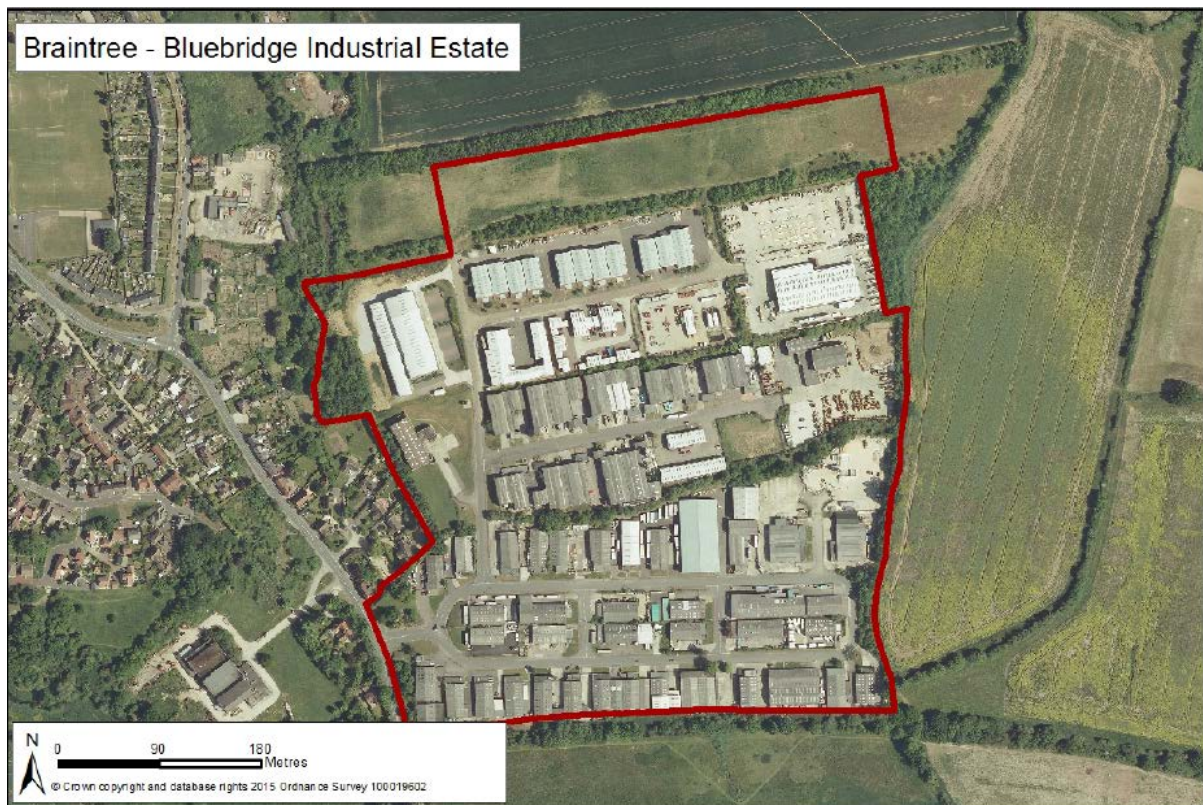
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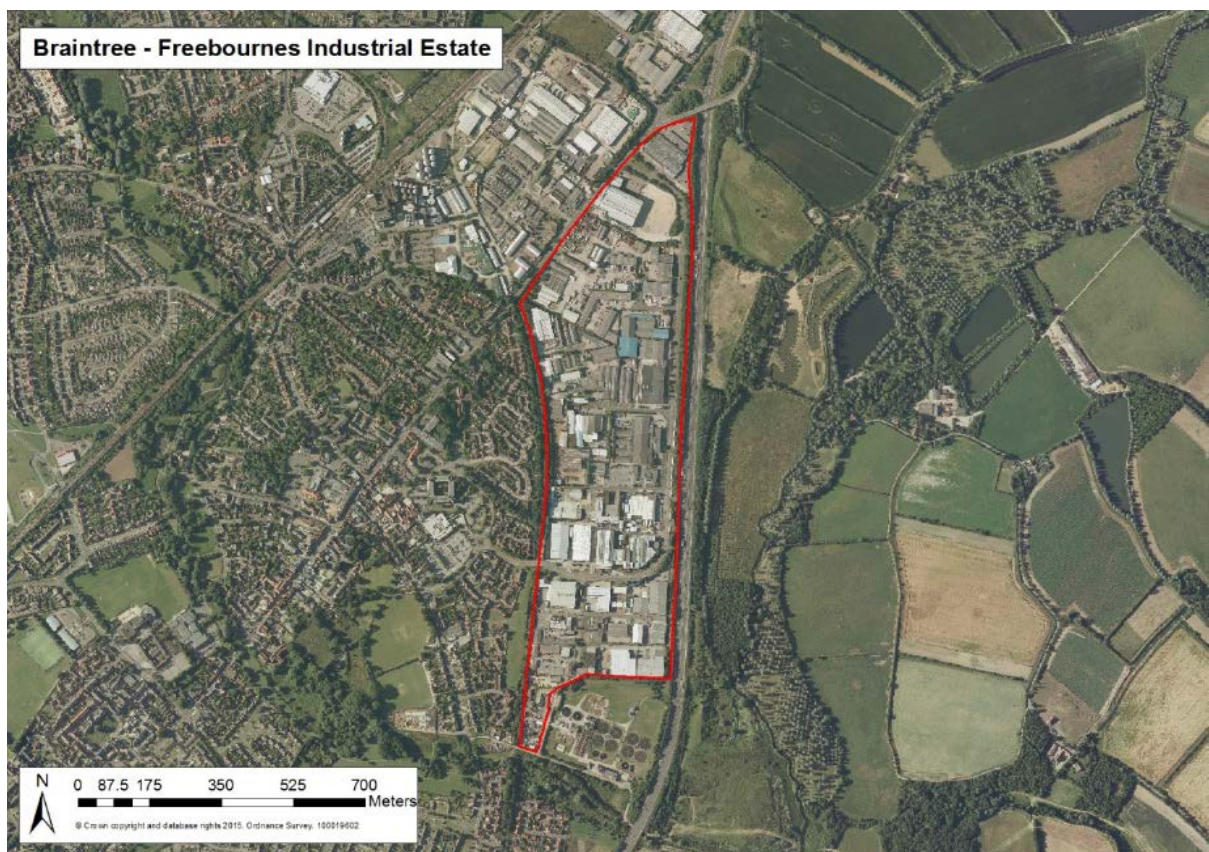
District: Braintree

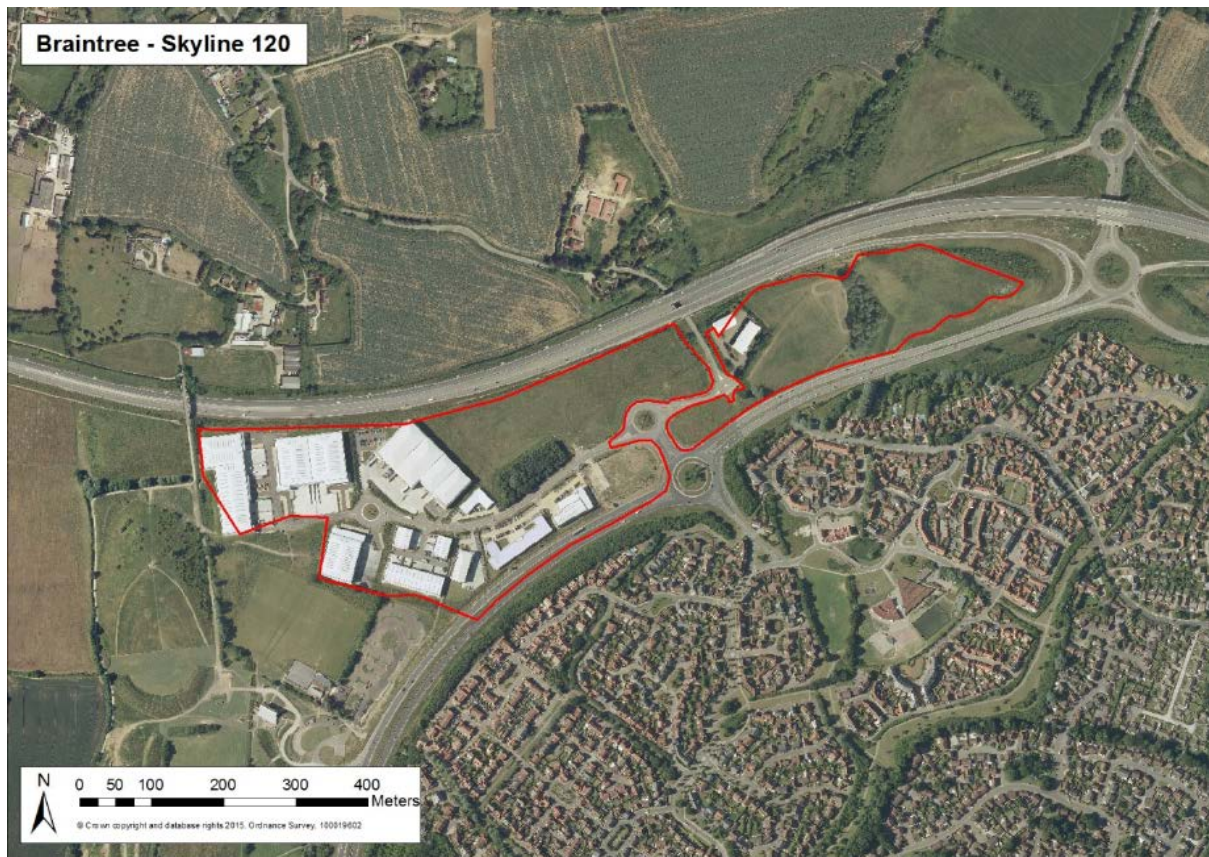
Site Name: Cordons Farm

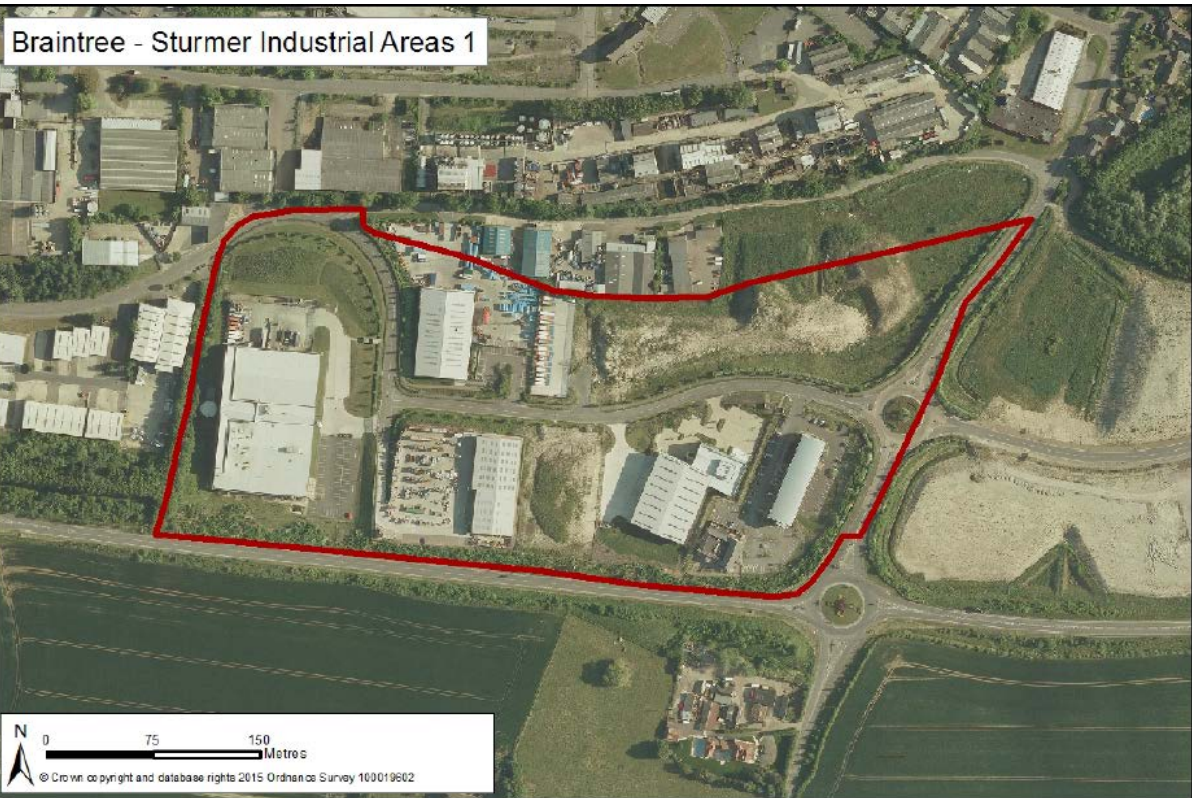


Appendix 2 – Map of sites - Areas of Search



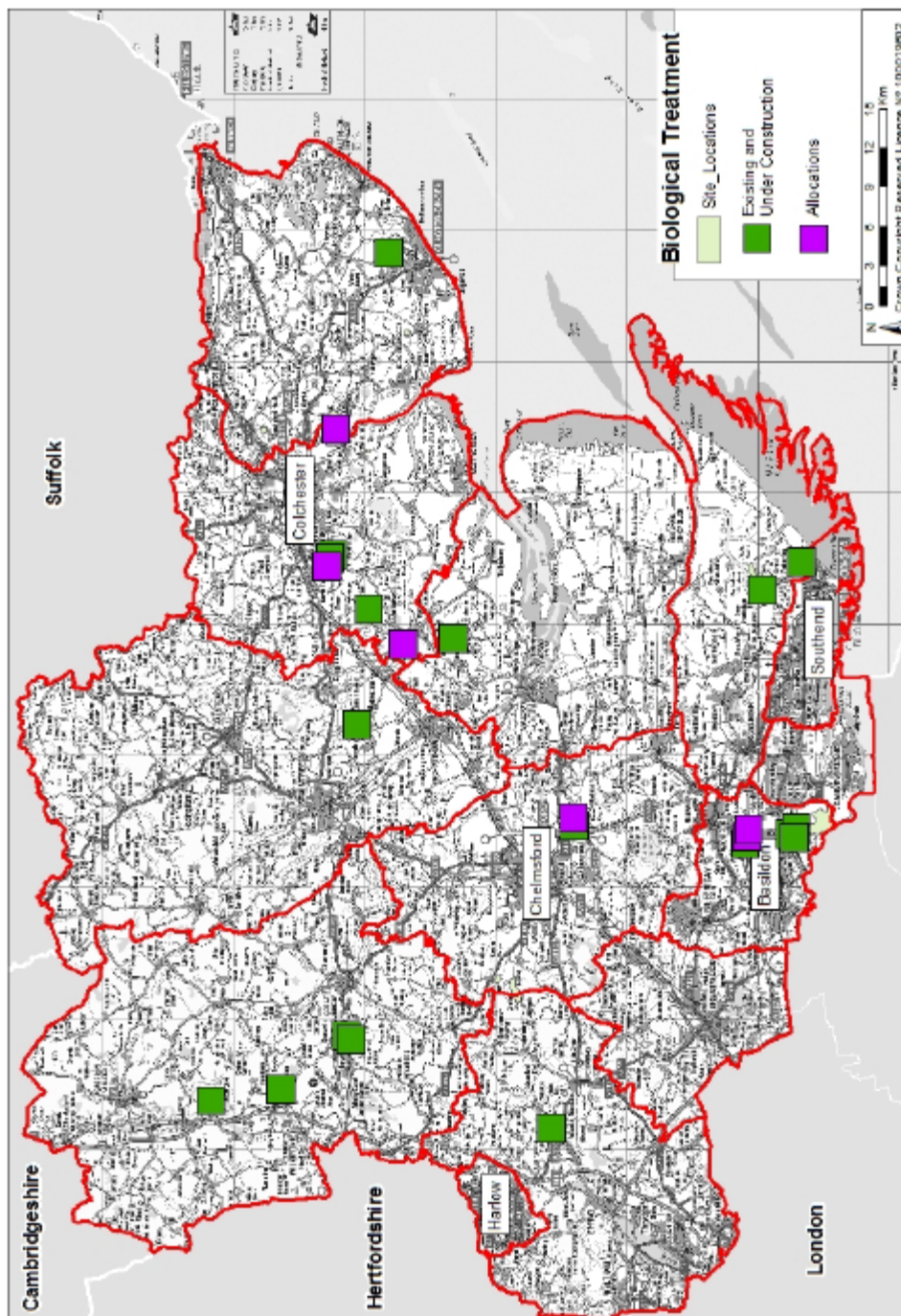




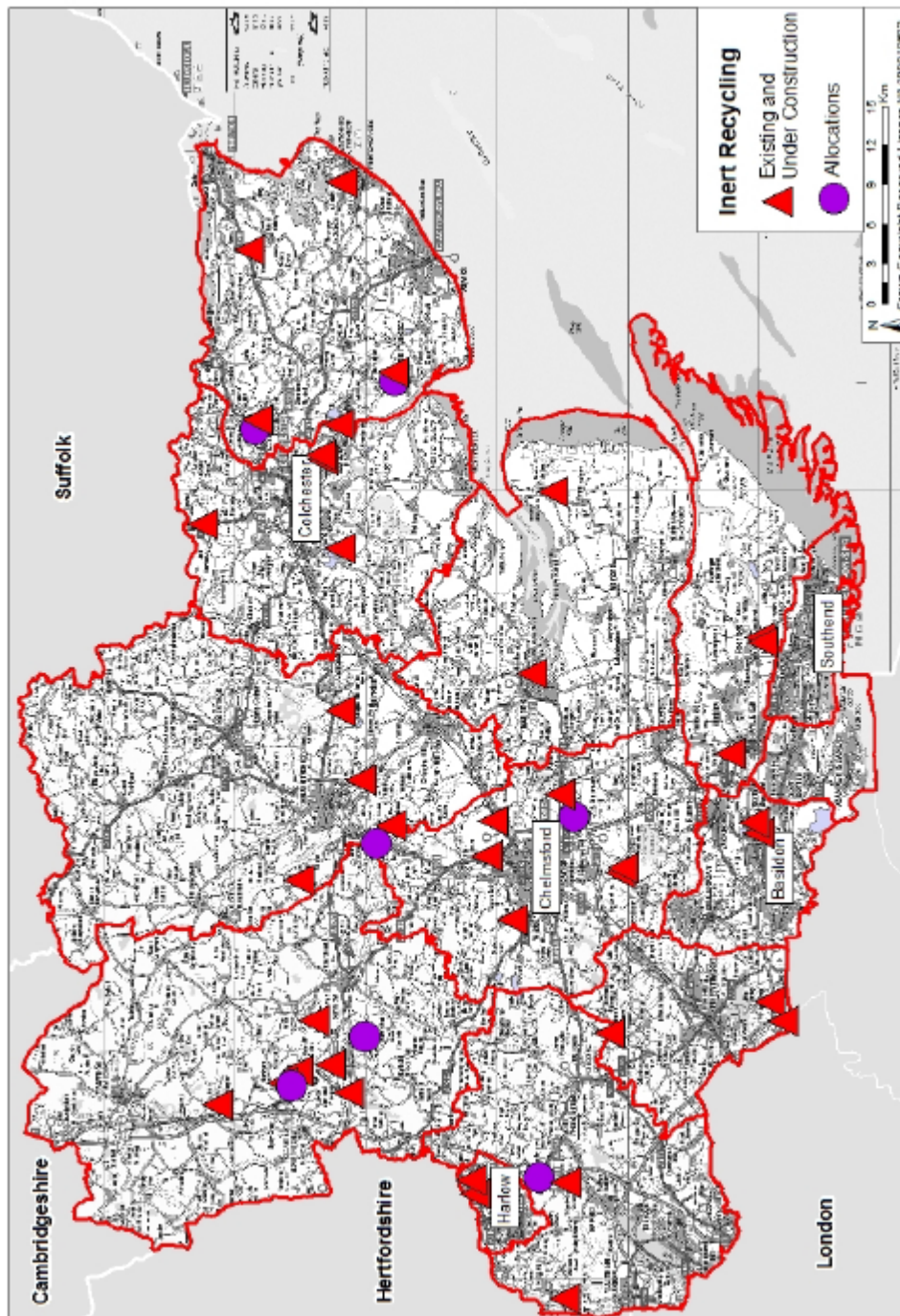


Appendix 3 – Map of sites – Picture 6, Picture 7, and Picture 8

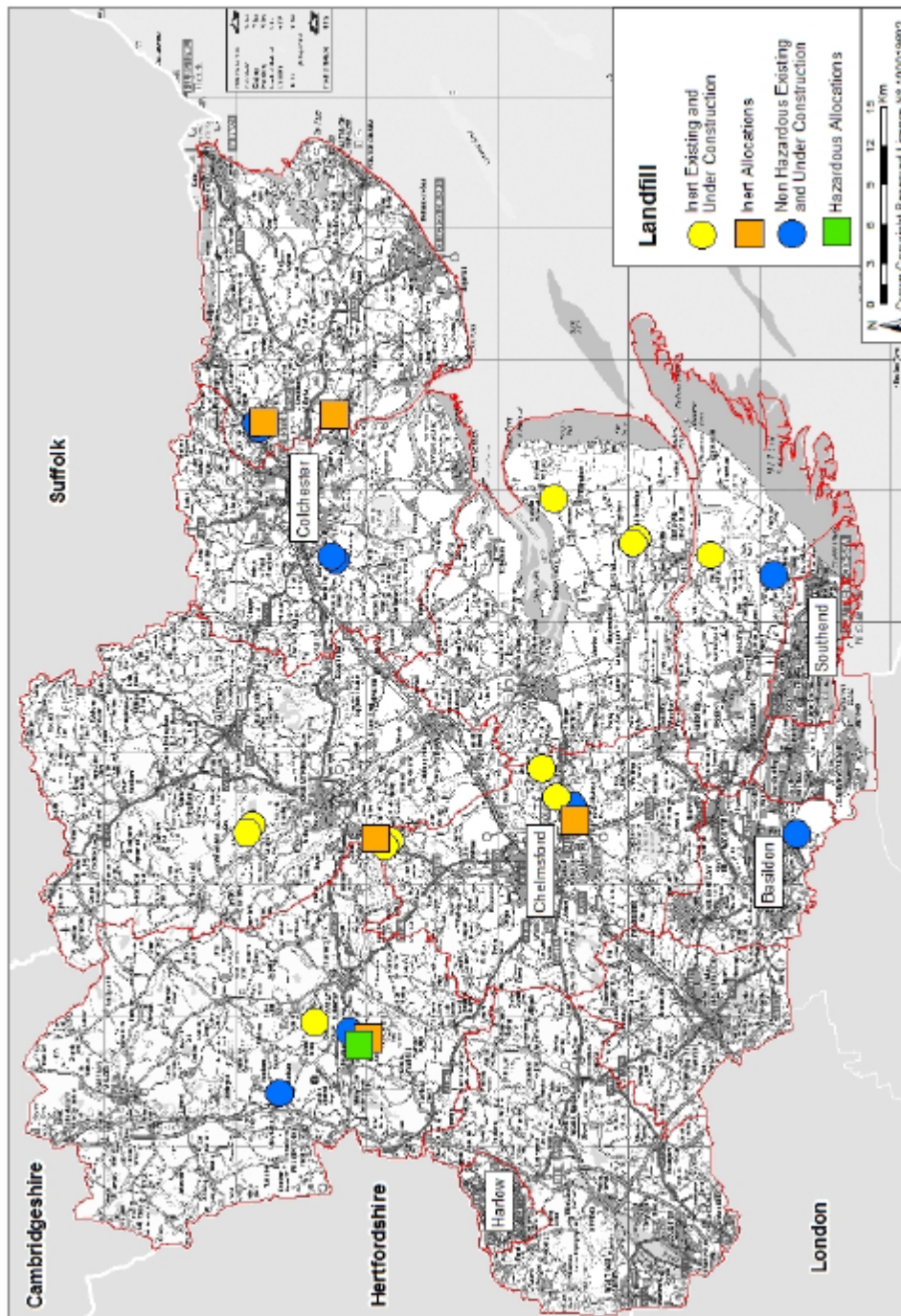
Picture 6 – Existing, under-construction (2012) and allocated bio-logical treatment facilities.



Picture 7 – Existing, under-construction (2012) and allocated construction, demolition & excavations materials recovery facility



Picture 8 – Existing, under-construction (2012) and allocated landfill facilities within the plan area.



Braintree District Council Statement on the Duty to Co-operate		Agenda No: 8
Corporate Priority: Securing appropriate infrastructure and housing growth Portfolio: Planning and Housing Report Presented by: Alan Massow Report prepared by: Alan Massow		
Background Papers: <ul style="list-style-type: none"> National Planning Policy Framework (NPPF) National Planning Practise Guidance (NPPG) Localism Act (2011) Planning and Compulsory Purchase Act (2004) 		Public Report: Yes
Options: To approve/not approve the Duty to Co-operate Statement.		Key Decision: No
Executive Summary: The Duty to Cooperate (DTC) was created in the Localism Act 2011. It places a legal obligation on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. This report outlines the proposed approach which the Council will undertake to fulfil its obligations under that Duty. The Draft statement is set out in Appendix A and covers issues such as joint working, memorandums of understanding, and the joint commissioning of evidence base.		
Decision: To approve the Council's statement on the Duty to Cooperate as set out in Appendix A.		
Purpose of Decision: To approve the Council's approach to Duty to Cooperate.		
Corporate implications		
Financial:	The preparation of the Plans set out within the LDS will be a significant cost which will be met through the Local Plan budget.	
Legal:	To comply with Governments legislation and guidance.	
Equalities/Diversity	The Councils policies should take account of equalities and diversity.	
Safeguarding	None	
Customer Impact:	There will be public consultation during various stages of	

	the emerging Local Plan.
Environment and Climate Change:	This will form part of the evidence base for the emerging Local Plan and will inform policies and allocations.
Consultation/Community Engagement:	There will be public consultation during various stages of the emerging Local Plan.
Risks:	The Local Plan examination may not take place. The Local Plan could be found unsound. Risk of High Court challenge.
Officer Contact:	Alan Massow
Designation:	Senior Policy Planner
Ext. No.	2577
E-mail:	alan.massow@braintree.gov.uk

1 Background

1.1 The Duty to Cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation on strategic cross boundary matters, such as providing land for new homes and jobs, infrastructure and flood risk. These are issues which may have an impact in more than the local authority area.

1.2 Local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit a Local Plan for examination. It should be noted that it is not a duty to agree.

1.3 The Council must be able to demonstrate, to the satisfaction of the Inspector, how it has complied with the legal duty at the Local Plan examination, and the Duty is the first area which will be examined. If the Council is unable to provide robust and credible evidence demonstrating this, the Local Plan examination will not be able to proceed. A number of local authorities have failed to meet this Duty and have had to withdraw their Local Plans from examination.

1.4. For the Duty to Cooperate to be successful it will be necessary to show that engagement has taken place at both officer and Member level.

1.5 The Council has the Statement of Community Involvement (SCI) which sets out how the Council will consult with the local community, interest groups, businesses etc in all aspects of planning. An updated version of this document was approved in September 2013 and can be found at the following link
http://www.braintree.gov.uk/downloads/file/2710/statement_of_community_involvement_sept_2013

However BDC does not currently have a published approach to the Duty to Co-operate.

2 The Proposed Approach

2.1 **Appendix A** to this report sets out the Council's Draft Statement on Duty to Co-operate. It includes details of the approaches which the Council will be adopting to ensure that the Duty to Co-operate is sufficiently met and recorded throughout the

Local Plan preparation process. It also includes details of the prescribed bodies which the legal duty refers to. It should be noted of course that the Council has a much wider consultation and engagement strategy than the formal prescribed bodies.

2.2 If approved by Members, this document will be added to the Local Plan evidence base and will be used to provide certainty in how the Council will deal with the Duty during the preparation of the new Local Plan.

2.3 When the new Local Plan is submitted for examination, robust evidence of the efforts that have made to cooperate on strategic cross boundary matters must be submitted. This could be in the form of a statement or report submitted to the examination. Evidence should include details about who the authority has co-operated with, the nature and timing of cooperation and how it has influenced the Local Plan. This statement will help to support that document

2.4 It should be noted that the Council is already undertaking a number of approaches to the Duty to Co-operate which include;

- Commissioning evidence base documents jointly across the whole of Essex (e.g. the Gypsy and Traveller and Traveller Accommodation Assessment) or in smaller groups (e.g. The Strategic Housing Market Assessment).
- Meeting with neighbouring local authorities, key stakeholders and prescribed bodies in continuing and ongoing discussions on the progress of our Local Plan and any planning or resource planning documents that they are producing.

2.5 The Council is also working with 5 other authorities in the north and central area of Essex on a joint Memorandum of Co-operation. This document will be expected to show that all the participating authorities agree to a number of key principles which will help guide development in this area within the next Local Plan cycle and beyond. It is expected that an update on this work will be able to be reported to Members in the Autumn.

3 Recommendation

It is recommended that Members approve the Councils Statement on the Duty to Co-operate as set out in Appendix A.

Appendix A

Braintree District Council

Draft Statement on Duty to Co-operate July 2015

The Duty to Cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation on strategic cross boundary matters, such as providing land for new homes and jobs, infrastructure and flood risk. These are issues which may have an impact in more than the local authority area.

Braintree District Council has a long history of effective joint working with other public bodies on plan making activities. This historical background of co-operation will provide a strong foundation on which to implement the Duty to Co-operate. Nevertheless joint working to address strategic cross boundary issues can be challenging.

The following text outlines Braintree District Council's approach to the Duty to Cooperate;

The Council's Officers and Members will actively engage with other Local Authorities and Public Bodies in strategic matters, which impact on the District and its neighbours, under the Duty to Co-operate. The Council will respond in a timely manner to requests, and will seek a positive and pro-active dialogue to resolve cross border matters.

The National Planning Practice Guidance sets out that there is no definitive list of actions that constitute effective co-operation under the Duty. But that effective co-operation is likely to require sustained joint working with concrete actions and outcomes and is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone.

The activities that fall within the Duty to cooperate include activities that prepare the way for or support the preparation of Local Plans and can relate to all stages of the plan preparation process. This might involve joint research and evidence gathering to define the scope of the Local Plan, assess policy impacts and assemble the necessary material to support policy choices.

The Council will undertake its obligation under the DTC as follows;

- Commissioning joint evidence base documents as required;
These are technical evidence documents, normally but not always produced by independent specialist consultants. The joint commissioning of evidence ensures a standard approach to assessment has been made across the area covered and also makes the best use of local authority resources.

- Hold joint meetings with relevant authorities as and when required;
Throughout the Plan process, meetings will be held with all relevant stakeholders to inform and discuss the Local Plan preparation. These meetings will also include clear actions and outcomes of further work to resolve any issues under discussion and ensure that decisions are made.
- Pre-consult with relevant authorities during the production of the new Local Plan and other relevant local plan documents;
Draft Plans will be shared with relevant authorities so that prior to public consultation, any issues can be discussed and resolved wherever possible, ensuring the Local Plan will be sufficiently robust.
- Memorandums of understanding to be drafted between authorities where significant strategic issues need to be resolved;
Where appropriate the local authority will enter into Memorandums of understandings with relevant authorities, this is to ensure strategic cross border matters are dealt with efficiently and effectively and that both sides have a clear understanding of the processes involved, and key issues.
- Respond to Duty to Cooperate requests promptly;
This is to ensure that Duty to Cooperate issues can be responded to quickly, without causing unnecessary delay to the production of the Local Plan.
- Maintaining a record of all correspondence with relevant bodies;
A report will have to be presented at examination demonstrating how the Council has fulfilled its obligations under the Duty to Cooperate. A full and auditable record of the efforts made by the Council under the Duty is necessary to provide a robust and credible evidence base.
- Provided written agreement on agreed course of action;
All agreements will be put in writing. This is in order to make sure that all parties have a clear understanding of agreed or not agreed courses of action.
- Publishing in its Annual Monitoring Report updates on the Duty;
This will help inform the Local Plan examination.

Duty to Cooperate bodies

The following bodies (also known as prescribed bodies) are identified as being relevant for the production of Braintree's Local Plan documents.

- Essex County Council;
- Neighbouring local planning authorities;
- Environment Agency;
- Natural England;
- Clinical Commissioning Group;
- National Health Service Commissioning Board;
- Essex Police;

- Historic England;
- Integrated Transport Authority;
- Highways England;
- Marine Management Organisation;
- Network Rail;
- Highways England;
- Civil Aviation Authority;
- Homes and Communities Agency;
- Office of Rail Regulation;
- Sport England;
- South East Local Enterprise Partnership;
- Local Nature Partnership;
- Utility and infrastructure providers.

All these organisations are included in the Council's consultation database.

The Council looks forward to a constructive working relationship with all relevant bodies in the production of local development documents, and to agree appropriate courses of action on strategic cross border matters.