

LOCAL PLAN SUB-COMMITTEE AGENDA

Monday, 02 October 2017 at 06:00 PM

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

THIS MEETING IS OPEN TO THE PUBLIC
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Members of the Local Plan Sub-Committee are requested to attend this meeting to transact the business set out in the Agenda.

Membership:-

Councillor D Bebb	Councillor Lady Newton
Councillor Mrs L Bowers-Flint (Chairman)	Councillor Mrs W Scattergood
Councillor G Butland	Councillor Mrs G Spray
Councillor T Cunningham	Councillor Miss M Thorogood
Councillor D Hume	
Councillor Mrs J Money	

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

A WRIGHT
Acting Chief Executive

INFORMATION FOR MEMBERS - DECLARATIONS OF INTERESTS

Declarations of Disclosable Pecuniary Interest, Other Pecuniary Interest or Non-Pecuniary Interest

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

Question Time

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PUBLIC SESSION		Page
1	Apologies for Absence	
2	Declarations of Interest To declare the existence and nature of any Disclosable Pecuniary Interest, other Pecuniary Interest, or Non-Pecuniary Interest relating to Items on the Agenda having regard to the Code of Conduct for Members and having taken appropriate advice where necessary before the meeting.	
3	Minutes of the Previous Meeting To approve as a correct record the Minutes of the meeting of the Local Plan Sub-Committee held on 11th July 2017 (copy previously circulated).	
4	Public Question Time (See paragraph above)	
5	Local Development Scheme - Revised	4 - 6
6	Spacial Strategy Formulation	7 - 9
7	Braintree District Publication Draft Local Plan - Consultation Responses	10 - 40
8	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.	
9	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.	
	<i>At the time of compiling this Agenda there were none.</i>	

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

Braintree Draft Local Plan – Revised Local Development Scheme		Agenda No: 5
Portfolio: Planning and Housing Corporate Outcome: Securing appropriate infrastructure and housing growth Report Presented by: Emma Goodings Report Prepared by: Julie O’Hara		
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) Revised Local Development Scheme (Feb 2017) 		Public Report: Yes Key Decision: No
Executive Summary: <p>The Council is required to keep an up to date Local Development Scheme (LDS) which is the project management document that sets out the programme of work that the local authority will be carrying out on planning policy documents in the next three years. This latest iteration of the LDS covers the three years from October 2017 to December 2019. It updates the timetable for the Local Plan production, Strategic Growth Development Plan Document/s (DPD) and supporting SPDs.</p> <p>The LDS is attached in full in the Appendix</p>		
Recommendation: <p>To approve the Braintree District Local Development Scheme October 2017 – December 2019.</p>		
Purpose of Decision: <p>To agree the project management and timetable for the Braintree Local Plan.</p>		

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 examination may not take place. The Local Plan could be found unsound. Risk of High Court challenge.
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1 Background

- 1.1 Braintree District Council is working on a new Local Plan which will guide development in the District between now and 2033. Once adopted this will replace the 2011 Core Strategy and the 2005 Local Plan.
- 1.2 The Planning and Compulsory Purchase Act 2004 requires the Council to prepare a Local Development Scheme (LDS). This sets out the rolling programme for the preparation of planning documents that will form Braintree District Council's Local Plan. It identifies the key stages in the preparation of the Council's Local Development Documents.
- 1.3 Whilst not a requirement, in its LDS, Braintree also sets out progress made on the evidence base to support strategic planning, Supplementary Planning Documents (SPDs) and briefly outlines the progress on Neighbourhood Plans in the District.
- 1.4 If approved at committee, this Local Development Scheme will replace the one which was approved in February 2017.

2 Reasons for Local Development Scheme Update

- 2.1 Since the LDS was approved in February 2017, work on the Local Plan has been progressing and the evidence base status needs to be updated. The Local Development Scheme should be as up to date as possible for the imminent submission of the Plan to the Planning Inspectorate.

- 2.2 The timetable for the production of the strategic growth DPD/s (containing further details of any allocated garden communities) is also being revised to ensure that they fit in at the appropriate time of the Local Plan timetable and contain appropriate consultation periods. This timetable is also reflected at Colchester and Tendring authorities to reflect the joint work as part of the North Essex Garden Communities Project, and with Uttlesford District Council regarding the West of Braintree DPD.

3 Timescale

- 3.1 This LDS proposes that the submission of the Local Plan take place in early October 2017.
- 3.2 Following submission, the timetable of the Local Plan is largely within the control of the Planning Inspectorate. However our estimation of the timetable, based on the published timelines from the Inspectorate is that examinations would take place in Winter 2017 and Spring 2018 and the document would be adopted by the Council in September 2018. It should be noted that the final adoption date of the Local Plan is unchanged.

4 Next Steps

- 4.1 If the LDS is agreed at committee it will be added to the website and progress monitored against the timetable set out within it. The updated LDS will form part of the body of documents submitted to the Planning Inspectorate.
- 4.2 The LDS is reviewed at least every year, but any significant changes to the timetable will require a further update of the document to be brought to the committee.

Recommendation: To approve the Braintree District Local Development Scheme October 2017 – December 2019

Braintree District Publication Draft Local Plan – Spatial Strategy Formulation		Agenda No: 6
Portfolio	Planning and Housing	
Corporate Outcome:	A well connected and growing district with high quality homes and infrastructure	
Report presented by:	Alan Massow	
Report prepared by:	Alan Massow	
Background Papers:		Public Report: Yes
<ul style="list-style-type: none">National Planning Policy Framework (NPPF)National Planning Practise Guidance (NPPG)Braintree District Draft Local Plan (June 2016)Braintree District Publication Draft Local Plan (June 2017)Sustainability AppraisalsLocal Plan Sub Committee Agendas and Minutes		Key Decision: No
Executive Summary:		
<p>The Spatial Strategy Formulation is a document intended to provide a summary of the background evidence base, and opportunities and constraints in the District which were used to help determine the most appropriate strategy for the District to meet its growth requirements.</p> <p>It summarises the Local Plan evidence base and development options, as well as providing mapping showing the District’s constraints and infrastructure.</p> <p>Eight development options are set out in the report of which four comprise the proposed Local Plan strategy.</p> <p>The document also concludes that the District will be able to meet its identified levels of growth when considering the environmental constraints within the District.</p>		
Recommended Decision:		
<p>To approve the Spatial Strategy Formulation Document as part of the evidence base for the Local Plan.</p>		
Purpose of Decision:		
<p>To provide a robust and credible evidence base for the Local Plan.</p>		

Corporate Implications	
Financial:	The cost of the production of the Local Plan and its evidence base has been met from the Local Plan budget. The costs of the consultation and examination process will be met from the Local Plan budget.
Legal:	The Local Plan must meet the requirements for soundness set out in the NPPF and other regulatory requirements. The Publication Draft Local Plan is considered to be sound and the relevant legal requirements have been met.
Safeguarding:	N/A
Equalities/Diversity:	The Publication Draft Local Plan is accompanied by a Equalities Impact Assessment
Customer Impact:	The Local Plan, once adopted, will impact all those living, working and travelling in the District.
Environment and Climate Change:	Policies in the Publication Draft Local Plan include those in relation to mitigating the impact of growth on the environment and climate change
Consultation/Community Engagement:	The Publication Draft Local Plan is subject to a period of public consultation for 6 weeks from the 12 th June 2017
Risks:	That the Draft Local Plan will be found unsound at examination
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1 Background

- 1.1 The District is required to have a Local Plan in place to guide development in the District over a 15 year period. BDC have been working on a new Plan since 2014, and have undergone several rounds of consultation. It is expected to be submitted to the Planning Inspectorate in October.
- 1.2 The Spatial Strategy Formulation is a document intended to provide a summary of the background evidence base, and opportunities and constraints in the District which were used to help determine the most appropriate strategy for the district to meet its growth requirements.

2 Spatial Strategy Formulation

- 2.1 The document sets out the policies within the Local Plan which are considered to be strategic in nature and are used to determine which areas are appropriate for what type of development. Following this the National Planning Policy Framework position is summarised, with each subsequent section referring to relevant sections of the NPPF.
- 2.2 One of the earliest evidence base documents agreed was the Development Boundary Review Document, which was produced to help determine which

sites were most appropriate for inclusion in development boundaries. It set out criteria.

- 2.3 Following this is an evidence base summary which sets out the evidence base for the Local Plan, what it contains, and how it influences the chosen strategy document.
- 2.4 The document outlines the current planning situation for the Main Towns, Key Service Villages, villages and countryside, and finally a summary of the Sustainability Appraisal/Strategic Environmental Assessment which set out in sustainability terms, which strategy it considers to be more appropriate.

3 Spatial Development Options

- 3.1 Eight different development options were considered during the production of the Local Plan and are set out in the report. The evidence base and SA/SEA has helped the Council to conclude that a combination of development options 1 – New homes should be focused on the existing towns and villages, 2 – New homes should be built in one or more new villages, option 4 – New homes should be built in areas where they can provide funding for major infrastructure projects such as new roads, and option 5 – New homes should be built on the existing public transport/rail network to encourage sustainable travel are the most appropriate strategy for the District.

4 Spatial Maps

- 4.1 Four spatial maps are included in the document showing environmental constraints, landscape capacity, settlements and services and the transport network. The maps help identify areas with significant environmental constraint and landscape capacity issues, which areas have what services available, and areas nearest the transport network.

5 Next Steps

- 5.1 The Local Plan will be submitted to the Planning Inspectorate in October and this document will form part of the evidence base.

Recommendation 1: That the Spatial Strategy Formulation Document is approved as part of the evidence base document for the Local Plan.

Responses to the Braintree District Publication Draft Local Plan		Agenda No: 7
Portfolio Planning and Housing Corporate Outcome: A well connected and growing district with high quality homes and infrastructure Report presented by: Emma Goodings Report prepared by: Emma Goodings		
Background Papers: <ul style="list-style-type: none"> National Planning Policy Framework (NPPF) National Planning Practise Guidance (NPPG) Braintree District Draft Local Plan (2016) Submission Draft Local Plan (2017) Local Plan Sub Committee agenda and minutes 12th April and 16th May 2017 Council agenda and minutes 5th June 2017 		Public Report: Yes Key Decision: No
Executive Summary: This report summarises the consultation held on the Publication Draft Local Plan and the responses that were received to it. The report notes the contents of these and advises Councillors of the likely timetable going forward.		
Recommended Decision: To note the consultation responses to the Braintree District Council Publication Draft Local Plan.		
Purpose of Decision: To keep Members informed of progress on the Local Plan.		

Corporate Implications	
Financial:	The cost of the production of the Local Plan and its evidence base has been met from the Local Plan budget
Legal:	The Local Plan should meet the requirements for soundness set out in the NPPF
Safeguarding:	N/A
Equalities/Diversity:	The Local Plan is accompanied by a Equalities Impact Assessment
Customer Impact:	The Local Plan will impact all those living, working and travelling in the District.
Environment and Climate Change:	Policies in the Local Plan include those in relation to mitigating the impact of growth on the environment and climate change
Consultation/Community Engagement:	The Local Plan was subject to a period of public consultation for 6 weeks from the 12 th June 2017
Risks:	That the Local Plan will be found unsound at examination
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1 Background

- 1.1 The Braintree District Council Publication Draft Local Plan is made up of two parts. The first, section 1, is a joint strategic Plan was prepared with Colchester Borough Council and Tendring District Council and deals with cross boundary strategic issues including the Garden Communities. Section 2 of the Plan relates to the Braintree District area specifically.
- 1.2 At the Council meeting on the 5th June 2017 Council agreed to undertake a final round of consultation on the Local Plan and then submit it for examination to the Independent Planning Inspectorate. This consultation took place for 6 weeks between the 16th June and the 28th July 2017. The results of which are the subject of this report.

2 Consultation

- 2.1 The consultation followed the methodology and process set out in the consultation strategy approved by the Local Plan sub-committee on the 12th April 2017. To summarise this included a magazine sent to all households in the District, coverage across printed media, our own website and social media, direct notification emails/letters to those which have been involved in the Local Plan to date or asked to be kept updated and a series of drop in sessions across the District, including one targeted at businesses.
- 2.2 The drop in events were well attended and as well as BDC planning policy officers, included representatives from Essex County Council highways, the

garden communities project and Colchester Borough Council officers were relevant. Approximately 680 people attended the BDC events and many stayed for a considerable amount of time, discussing a range of issues with officers who were in attendance. Consultation forms and guidance notes were available at all the events to take away, as well as links to the online consultation form.

- 2.3 666 responses were received by BDC on section 1 from 220 individual consultees. These are combined with all the responses received on this section by Braintree, Colchester and Tendring. The comments need to go through their final checks to remove duplicates but the comments currently stand at around 1,123. This includes a response by the Campaign Against Urban Sprawl in Essex (CAUSE) was sent in on behalf of 1,250 individuals. A summary of the main issues can be seen in **Appendix 1** to this report.
- 2.4 In total 1,092 responses have been received on the section 2 of the Local Plan from 348 individuals. The full comments can be found on <http://braintree-consult.limehouse.co.uk/portal> and officers would encourage all members to read those responses. Most comments were made to LPP17 which is the overall housing strategy policy (71 comments) and to the Braintree Inset Map (50 comments)
- 2.5 Consultation responses were requested on matters of soundness as per the Planning Inspectorate model guidance form. Where these were not included on the initial responses, further information was requested (with further time and guidance given on how to complete the form). However all responses which were received will be sent to the Planning Inspectorate. The Inspector will then need to decide how they deal with those representations which do not address all points, particularly in relation to soundness and legal compliance and whether they wish to appear at the examination sessions.
- 2.6 Officers have considered the comments received and consider that there are no comments which would require a delay to the Local Plan timetable for major changes to be made and to be consulted upon. However some minor changes and updates are likely to be made during the course of the examination as recommended by the Inspector, who also has the opportunity to suggest and consult upon more major modifications to the Local Plan.

3 Next Steps

- 3.1 The Council, along with partners Tendring District Council and Colchester Borough Council intends to submit the Publication Draft Local Plan and evidence base to the Planning Inspectorate in early October. This involves sending the document, its supporting evidence base and all representations received to the Planning Inspectorate who will then appoint an Inspector to examine the Local Plan.
- 3.2 From this point on the timetable is set by the Planning Inspectorate. However the Planning Inspectorate procedural practice note sets out a broad timetable which would indicate that public hearing sessions will start at least 10 weeks

after the submission of the Local Plan. Officers understand that the strategic section 1 will be examined separately first, in a joint examination with our partner authorities, with section 2 hearing sessions later in 2018.

- 3.3 It is expected that the whole Local Plan examination process will be completed in the Autumn of 2018, when the Local Plan can then be adopted.

Recommendation

**To note the consultation responses to the Braintree District Council
Publication Draft Local Plan**

Appendix 1

Summary of the Key Issues raised in representations on Section 1

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
SECTION 1		
Introduction and Vision	17	<ul style="list-style-type: none"> • Deliverability and viability questioned • Infrastructure first • Collaboration with existing communities to ensure appropriate integration of new communities • Need to have secured economic success across the area to underpin growth – economic generator needed. • Natural England – need for a high level strategic objective on protecting and enhancing natural environment. • Historic England – need for reference to distinctive character of North Essex and protecting heritage assets/character of existing settlements. • Sport England – need strategic objective that specifically covers creating healthier and active communities.
SP1: Presumption in Favour of Sustainable Development	18	<ul style="list-style-type: none"> • Existing infrastructure deficit and impact not addressed. Insufficient capacity to support growth. • Adverse impacts do not outweigh perceived benefits. • Highways England – support reducing the need to travel by private car • New development should become measurably more sustainable • CPRE -Garden Communities might accord with theory of sustainable development principles, but scale, location and potential impact of

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		<p>those proposed in North Essex questioned.</p> <ul style="list-style-type: none"> • Infrastructure needs to be delivered prior to development.
SP2: Spatial Strategy for North Essex	29	<ul style="list-style-type: none"> • Need for more overall leadership and responsibility when considering cumulative impact – must include investment in local businesses and infrastructure. • Insufficient proposals for infrastructure upgrades, lack of current infrastructure. • North East Essex Clinical Commissioning Group – Ensure location of appropriate healthcare facilities to support Garden Communities. • Provision to protect the existing character of the area needed. • Clarity on location of Garden Communities needed. • Highways England – current designs are based on previously envisaged growth rates rather than new proposals. Steep change in provision and take up of public transport needed. • CAUSE – proposals for two of the three Garden Communities should be dropped – not supported by Sustainability Appraisal. • CPRE – Council hasn't demonstrated it can implement balanced communities supported by infrastructure. • Proposals for Garden Communities rely on future plans which may or may not demonstrate deliverability/viability. • Greater clarity needed on what Garden Communities are intended to achieve and whether aims could be delivered by more traditional development such as urban extensions. • Historic England – provide reference to settlements maintaining their distinctive and historic character.

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SP3: Meeting Housing Needs	20	<ul style="list-style-type: none"> • North East Essex Clinical Commissioning Group – Important to ensure health facilities are positioned in suitable places to enable communities to access healthcare appropriately. • No justification for applying a market signals uplift to the demographic projections. If these removed, that the need for two out of three garden communities is removed. • Developer representations received supporting upward adjustments in housing numbers to reflect increased migration from London, concerns regarding affordability, inclusion of Maldon within the Strategic Housing Market Area, and Tendring population calculation uncertainties. • Lack of housing need evidence for proposed post-2033 growth. • Basildon District Council - Unmet need for housing may arise from the South Essex Housing Market area. Amount has not been quantified but South Essex authorities may ask authorities in other HMA's in Essex to help in meeting unmet need. Issue could be overcome by a modification that introduces a review mechanism. • Simultaneous delivery of two Garden Communities – viability of this questioned. • No evidence that 'step change' in sustainable transport is possible. • Include more sites in first five year period. • Deliverability of numbers questioned, particularly since Garden Communities not able to contribute to delivery until end of plan period.
SP4: Providing for Employment and Retail	15	<ul style="list-style-type: none"> • Address implications of commuting to London and include reference to its role. • Delivery of high quality jobs questioned – plan doesn't provide

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		<p>explanation for how and where they'll be provided.</p> <ul style="list-style-type: none"> • Lack of evidence to demonstrate Garden Communities can meet target of one job per household. • Plan over-centralises employment in large employment zones and fails to link housing to local jobs. • No evidence for why a 'higher growth scenario' should be considered – would result in identifying land for employment that will not come forward.
SP5: Infrastructure and Connectivity	27	<ul style="list-style-type: none"> • Infrastructure hasn't kept pace with growth and insufficient infrastructure is planned to accompany new growth. • Delivery of infrastructure questioned – more information and certainty needed on funding sources, timescales, and how new communities will attract scale of investment required. • Wording of the policy is unclear and should be amended to require the delivery of necessary strategic infrastructure in advance of or in parallel with the specified need. • Faster broadband required, in particular to assist with service delivery • Viability evidence supporting policy is flawed. • Highways England - Roads Investment Strategy (RIS1) published in 2014, which committed Highways England to commence widening of the A12 between junctions 19 to 25 to three lanes, and to prepare options for consideration in RIS- 2 (2020-25) for widening between junctions 11 to 16 and 25 to 29. Essex County Council has been examining the feasibility of upgrading the A120 between Braintree and Marks Tey to a dual carriageway, with a view to submitting this for

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		<p>inclusion into a future RIS-2 funding round. Until housing and employment is committed the road schemes can really only deal with existing challenges allowing for a limited amount of growth as the designs are based on previously envisaged growth rates rather the much more ambitious level proposed in these consultations. This means the need careful planning to ensure proposed development is in the most appropriate place with the necessary facilities and infrastructure available at the right time and a steep change both in the provision and take up of public transport, if this level of development is to be sustainable.</p> <ul style="list-style-type: none"> • Natural England – transport infrastructure provides an opportunity to achieve net gain in nature through biodiversity enhancement and linkage of habitat corridors. • Historic England – A120 has archaeological potential. • Colchester Hospital Trust - Growth in housing has implications for local hospital services. Concerns over population figures in Infrastructure Delivery Plan - growth underestimated. • Details on how modal shift to non-car transport methods can be achieved needs to be provided before there can be confidence on lower car use in new developments. • Introduce visionary new ideas for movement involving collaboration with transport providers. • Sport England – Strategic infrastructure should include leisure and sport, to ensure benefits of co-location and encouraging active lifestyles. • Developers can only provide the mechanisms to allow infrastructure

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		providers to provide services – it cannot provide the services.
SP6: Place Shaping principles	23	<ul style="list-style-type: none"> • In view of its deterioration, allow town centre to be replaced with housing and allow edge of centre retail growth. • Development proposals need to include green spaces to address of loss of countryside. • Large scale communities can't respond to local character. Density shouldn't exceed 60 units per hectare. • Plan must exhibit a degree of common sense on car usage. • Inability of location to be self-contained • Lack of sense of community • Infrastructure budget too low and financial model is flawed. The likely result is short-cuts in delivery of principles set out in SP6 • Location wrong for Colchester Braintree Borders GC: high commuting • Design codes can play a part but over dependence on them can make master plans too rigid. Plan making process should be process rather than product orientated. • Two sources of design policy in SP6 and DM15 is unhelpful and will cause ongoing confusion. • Needs to be greater emphasis placed on the importance of recognising and protecting the integrity of existing places. • Each phase of development needs to be sustainable in its own right. • Natural England – strengthen policy to ensure new development incorporates biodiversity creation. • Require 'high' standards rather than 'highest'. • Policy is overly prescriptive in relation to design, public realm, parking

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		and green/blue infrastructure. Blue infrastructure not defined.
SP7		<ul style="list-style-type: none"> • Infrastructure needs to be guaranteed to be delivered before housing • Delivery of Garden Communities must be in context of meeting housing delivery targets for plan period • Provision for places of worship should be included • Allowances for infrastructure and contingency are too low. No evidence of sound financial risk assessment. • No evidence that policy of promoting sustainable travel will work • No housing need evidence for post-2033 period. • Objectively Assessed Housing Need not properly assessed. • CAUSE summary of points covered in their submission: <ol style="list-style-type: none"> 1. Detailed amendments required 2. Comments on Sustainability Appraisal 3. New towns: learning from the past 4. Positive vision for north Essex 5. OAN - unnecessary uplifts applied 6. Providing for employment 7. Rail constraints 8. Connectivity & infrastructure 9. Viability: West Tey's business case 10. West Tey: Costs & Risks 11. The deal for land-owners 12. Community engagement • Not certain necessary infrastructure including road and rail improvements, health, schools, etc., can be secured ahead of development. • Lack of rationale on choice of sites. • Highways England - Strong interdependence between these proposals and the improvements to the A12 and A120 and it will be essential that we work together to achieve our strategic objectives and ensure the evidence base is robust. Cumulative impact assessment should be

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		<p>carried out on the impact of development of growth in villages and in the early part of the plan period.</p> <ul style="list-style-type: none"> • No economic base • Start with East Colchester first to gain expertise • Use low quality agricultural land at Middlewick before high quality at West Tey. • South Colchester should be developed to release funds for necessary transport infrastructure before greenfield land to the west of Colchester. • Delivery mechanism needs to be established before garden communities included in the plan. • Concerns regarding proposed Local Delivery Vehicles. Alternative models and funding option should be explored, ie collaborative tenure with developer or strategic finance partner. • LDVs provide for tighter control over development, but scale of proposals for three concurrent garden communities raises concern about ability and capacity of LDV to deliver all Section 1 proposals. • Insufficient community engagement • Affordable housing target of 30% queried for its deliverability and effect on viability. • Consideration required of impacts and relationship with adjoining communities. • Natural England – Green infrastructure should be delivered according to defined standards. Need to identify how net gain in local biodiversity is to be achieved. • More guidance needed on ancillary facilities including retail and leisure uses.

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		<ul style="list-style-type: none"> • Historic England – Need demonstrable consideration of impact of Garden Communities on the historic environment. Plan should contain a framework to guide how boundaries and extent of garden communities are determined. Consideration of impacts and relationship with adjoining communities. • Scale should be reduced – too big in relation to existing communities.
SP8		<ul style="list-style-type: none"> • Guarantee infrastructure is provided before housing is built. • Provide good quality link road from A120 to A133 as an early part of development. • North East Essex Clinical Commissioning Group – Primary healthcare facilities to be provided as appropriate. • All new development should be over the brow of the hill and out-of-sight of existing residents. • Public transport and Park and Ride aspirations are unrealistic • Anglian Water - Reference welcomed to an upgrade to Colchester waste water treatment plant and off-site improvements to the foul sewerage network. Refer to the phasing of improvements to align the scale and timing of the proposed garden community given that development is expected to come forward after 2033. • Loss of excellent agricultural land opposed. • Potential impact on European designated sites • Affordable housing not well located for Tendring residents nor will it help foster economic growth in Tendring. • Lack of detail on proposed Salary Brook County Park, therefore insufficient protection of endangered species and distinctive sense of

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		<p>place. Essential that Salary Brook valley and adjacent woodland is safeguarded.</p> <ul style="list-style-type: none"> • Lack of mention of existing flooding issues in area – specific mitigation needed to prevent exacerbating the problem. • Need to adhere to a 1.5 km buffer between Greenstead/Longridge and the new settlement. Housing must be beyond tree line at top of hill to the east of Greenstead/Longridge. • No building south of A133. • Rapid transport links need to include cycle lanes. • Concerns about traffic on existing country lanes. • Noise shielding for new roads needed. • Historic England – concerned that new settlements will be housing led rather than considering the landscape and heritage assets.
SP9		<ul style="list-style-type: none"> • Concerns over rail capacity, parking capacity at stations, and potential changes to location of Marks Tey station • Objections to loss of Grade 2 agricultural land, poorer quality land should be considered first. • Current infrastructure inadequate. • Infrastructure, including upgraded A120 and A12, health and schools needs to be in place before houses built, but high levels of uncertainty regarding timings and likelihood of critical transport infrastructure improvements required in advance. • Green buffers for existing settlements should be designated and shown on proposals maps. • Policy should be more positive and precise as to integration with Marks

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		<p>Tey by reference to built environment, traffic, enhancements and retention of village identity and access to countryside.</p> <ul style="list-style-type: none"> • Proposal would create a commuter town following on from its location on rail line to London. • Economic basis for proposal has not been made- unclear where jobs would come from. • Extent of proposed Garden Community unclear – lack of consistent mapping between authorities. • Provision of places of worship should be specifically mentioned. • Anglian Water – agree that upgrade to waste water treatment plant and off-site improvements to foul sewerage network. Refer to phasing of improvements to align scale and timing beyond plan period. • Begin with East Colchester Garden Community before starting on West. Inclusion of West Colchester is premature. • Massive Government subsidies would be required. • Negative effect on rural setting and character of existing villages. • No meaningful public transport provided until 2030. • CAUSE -CBBGC not deliverable, viable or sustainable option, nor will it meet infrastructure requirements of its own population or current local population of Braintree and Colchester. • Scale is too large • Natural England. Adequate water treatment infrastructure should be included as a safeguard to ensure that phasing of development doesn't exceed capacity. Concerns about strength of protection and enhancement of natural environment. • Historic England – No indication as to how extent of garden

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		<p>communities will be determined. Concern that new settlements will be housing led rather than considering landscape and heritage assets. Potential for significant archaeological interest in the A12 and A120 area, along with listed buildings.</p> <ul style="list-style-type: none"> • Public transport aspirations are unrealistic. • No Plan B if Garden Community is not located by proposed A120/A12. • Clearer reference to Garden Community principles should be included. • Potential location for Tiptree spur road on/off the A12 needs to be defined. • Developer concerns over affordable housing viability. •
SP10		<ul style="list-style-type: none"> • Guarantee infrastructure is provided before housing is built. • Anglian Water – Refer to phasing of improvements to align scale and timing of garden community given that development is expected to come forward after 2033. • Places of worship should be allocated. • Integrity of existing settlements such as Rayne and Stebbing would be under threat from proximity of proposals. • Financial viability questioned • Lack of attention to safeguarding natural and historic amenities such as historic airfield at Andrewsfield. • Developer concerns over affordable housing viability. • Historic England – proposed garden community could have significant impact of setting of Saling Grove listed building and garden. No indication as to how extent of garden communities will be determined.

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		Stronger references to heritage asset safeguarding needed.
SECTION 2		
Vision and Objectives		<ul style="list-style-type: none"> • Natural England – Policies required on soil and land quality and on consideration of best and most versatile agricultural land • Historic England – Vision is too Town Centre focused. Objectives should include more explicit reference to whole Borough's historic environment. • Essex Wildlife Trust – Objectives should commitment to wildlife corridors. • Plan shouldn't rely on neighbourhood plans to allocate sites.
Strategic Policies SG1-SG8		<ul style="list-style-type: none"> • Strategy for Garden Communities criticised for choice of location; lack of infrastructure; lack of job creation potential; loss of agricultural land. • More development needed to address short time housing need. Allocate more small sites, sites in small settlements. • Incorrect to assume continuation of high housing growth levels in Colchester. • Different areas of Colchester not all equal in terms of sustainability and role as place. Stanway should be ranked higher in settlement hierarchy. • Historic England – Refer to both landscape and historic character, not just landscape. • Developers raised concerns over methodology used to calculate

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		<p>housing supply. Contingency needed to address potential non-delivery. OAHN is underestimated since it doesn't adequately consider increased migration from London; the ability of London to meet housing needs; or effectively assess key market signals.</p> <ul style="list-style-type: none"> • Lack of clarity on sources of economic growth, particularly for local jobs to avoid reliance on London and commuting. • Too much employment land allocated – flooding the market doesn't necessarily reduce price and render sites more viable. • Allocate employment sites in small villages. • Centres hierarchy on Tollgate should be revisited in light of its increasing prominence. Further work needed on retail evidence following Tollgate appeal decision. • More evidence on impact thresholds for retail proposals required – thresholds queried. • Improved digital connectivity required to enable growth. • Health (including NE Essex Clinical Commissioning Group and Colchester Hospital Trust) – Health sector needs to be fully engaged throughout process to ensure appropriate levels of health infrastructure. Hospital Trust queried population and housing basis of Infrastructure Delivery Plan. • Questions on accuracy and viability of Infrastructure Delivery Plan – reflect organisational commitments? Lack of statutory connection between the LDP and Local Plan. • More clarity needed on differences between strategic and local

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		<p>infrastructure.</p> <ul style="list-style-type: none"> • Concerns about legal agreements to increase contributions should viability improve during construction phase since costs can both rise and fall until completion. • Natural England – Develop recreational Avoidance and Mitigation Strategy. To address measure required to mitigate impacts on protected sites. • Impact on deliverability and viability of providing infrastructure first questioned by developers. • More clarity needed on the relationship between Neighbourhood Plans and Garden Communities. • University of Essex – location for medium to long term expansion of University Campus identified in Wivenhoe Neighbourhood Plan but not in Local Plan. • Concern that neighbourhood plans take a long time to produce and are not initiated directly by the Council, causing uncertainty for developers and delay housing delivery.
Environmental, Climate Change and Generic Infrastructure Policies		<ul style="list-style-type: none"> • RSPB and Natural England – Include specific mention to Recreational Avoidance and Mitigation Strategy (RAMS) • Maps required to clarify areas protected for environmental

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ENV1-ENV5 & CC1 -		<p>designations.</p> <ul style="list-style-type: none"> • Proper evaluation needed to alternative approaches to providing green infrastructure for Garden Communities. • Environment Agency – Recommend further wording requiring biosecurity protocol method statement prevent the spread of invasive non-native species. • Historic England – text should set out how the suite of strategic and development management policies protect the historic environment beyond policy DM16. • Essex Wildlife Trust – policy lacks a clear commitment to ensuring that developers aim to achieve a net gain in biodiversity. • Policy objectives should not be cumulative but should be considered individually. • Local Nature Reserves should be protected. • University of Essex objects to extension of Coastal Protection Belt to include land on east side of river which is currently allocated for an extension to the University campus. • Objections to deletion from Coastal Protection Belt of land lying to the east and south of Wivenhoe. • Natural England – caution should be used around term ‘irreplaceable’. Policy could be strengthened by inclusion of seascape as well as landscape character. • Environment Agency – Plan should identify a Coastal Change Management Area for any area likely to be affected by physical

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		<p>changes to the coast to make clear what development could be appropriate. A CCMA should be identified for Mersea Island.</p> <ul style="list-style-type: none"> • Concerns over requirement that development must demonstrate a coastal location is required. • Environment Agency – add text on contributing to protection and enhancement of water bodies. • Historic England Any policy encouraging energy efficiency should not that application will be different in relation to certain classes of historic buildings. • Individual developments would not necessarily be expected to meet Borough-wide needs. Explanation lacking of the requirements expected of a developer when considering whether to bring a scheme forward.
Centre Policies TC1-4		<ul style="list-style-type: none"> • Historic England – Strengthen wording on protection of heritage assets and their settings. Infrastructure accompanying transport works in historic areas can have a significant detrimental impact – wording needed to address this. • Retail impact thresholds are too restrictive. Insufficient flexibility to allow for introduction other non-A1 uses.
North Colchester Policies NC1-NC4		<ul style="list-style-type: none"> • Community building a requirement. • Concerns about rugby ground proposal -maximum of 200 dwellings on site to ensure compatibility with surrounding area. Opposition to loss of habitat.

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		<ul style="list-style-type: none"> • North Colchester Transport Plan is flawed – no more traffic should use Mill Road. • Highways England – Development could have a severe impact upon A12 and A120. Traffic Impact Assessment needed. This section of the A12 subject to a study for potential widening. • Allocation for 70 units south west of the Braiswick golf club does not fit with other policies in the plan. It would cause visual impact on views from West Bergholt and coalescence of West Bergholt with Colchester. • Improved infrastructure, road network improvements and vastly improved public transport links are required in the North Colchester/North Station/Northern Gateway areas, (along with suitable car parking at sports facilities) or whole area will be at a standstill. • Aspirations for developer-supported bus services not accompanied by evidence of deliverability. • Objection to proposed multiplex cinema at Northern Gateway due to impact on Odeon Cinema.
South Colchester Policies SC1 - 3		<ul style="list-style-type: none"> • No measures shown to alleviate the inevitable increased volume of traffic the new Gosbecks and Berechurch Hall estates will generate in Shrub End. • Any proposed development in Gosbeck area needs to pay careful regard to sensitive archaeology and biodiversity of area. • Essex County Council – Ensure provision for provision of a primary school and early years and child care facilities as a direct result of the Middlewick development and to meet education needs arising from

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		<p>other Local Plan allocations in south Colchester</p> <ul style="list-style-type: none"> • Objections to Middlewick allocations: <ol style="list-style-type: none"> 1. Traffic congestion already a problem - busy Mersea Rd and Berechurch Hall Rd. Junction Abbots Road and Old Heath Road very narrow and not suitable for site traffic Where will proposed access to new estate be? 2. Lack of other infrastructure - School places, sewers, community facilities, and health provision an issues.. 3. Destruction of green space. 4. Proposal came in later than other sites considered through plan-making process 5. Loss of biodiversity and wildlife – concerns over loss of the diverse woodland and heathland habitats and 2 protected species. A Local Wildlife site which warrants SSSI designation. 6. History – archaeology needs to be preserved. 7. Healthy living. More pollution and noise. Concerns about contamination with ammunition, carcasses from foot and mouth epidemic. 8. Public Transport. Bus routes are not easily accessible as mentioned. 9. Queries over need for development -housing numbers already sufficient and can be met elsewhere. 10. Reject housing proposal and create a South Colchester County Park. 11. Few employment opportunities close by for residents.

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		12. Lack of confidence in Council's ability to deliver supporting infrastructure.
East Colchester Policies EC1-EC4		<ul style="list-style-type: none"> • University of Essex – support thrust of EC1, but have concerns principally relating to the deletion of the existing land identified for campus expansion; the lack of information about the Orbital route; and the working of the paragraphs requiring possible contributions to offsite infrastructure. • Sport England University site includes a lot of sports infrastructure which merits protection. • Masterplan needed to clarify boundaries of Garden Community and University expansion. • Capacity for further expansion at Whitehall queried given traffic and air quality issues. • Provide access for all user groups, including equestrians.
West Colchester WC1 – WC5		<ul style="list-style-type: none"> • Highways England – Development at West Colchester could have a severe impact upon the A12 and A120. We would wish to see a traffic impact assessment demonstrating the potential impacts of such a proposal. Of particular concern are junctions 25,26,27,28&29. There may also be impacts upon the main line. However, although these need to be quantified this section of the A12 is subject to a study for potential widening.

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		<ul style="list-style-type: none"> • Stane Park developer - Policy needs redrafting in light of Tollgate decision to reflect Stanway's position in spatial hierarchy. Zone one needs to be reduced in extent to remove land at Stane Park, with related criteria altered to better facilitate economic growth. Inappropriate to have blanket policy not permitting main town centre uses. An additional Zone Three should be introduced for Stane Park recognising its strategic opportunities designating it for commercial uses that have a beneficial synergy with relevant components of the Economic Area. • Historic England - though Stanway has an established economic role and has seen much new development, there remain a number of listed buildings in the area whose setting and continued beneficial use should be considered as the area is identified for growth. • NE Essex CCG - Significant proposed developments will require Health to be involved with developers in the early stages and appropriate mitigation sought to enable the appropriate Health infrastructure for this growing community. Previous experience has meant that lack of engagement with both NHS England and the CCG has resulted in poor infrastructure and no mitigation to support the existing premises. • Objection to Chitts Hill – noise pollution and poor public transport links • Land off Dyers Road – concerns over highways infrastructure. Consider closing Dyers Road at Warren Lane junction to stop use as rat run. • Sport England – Chitts Hill site – buffer zone for playing fields required to ensure no risk of ball strike issues.

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		<ul style="list-style-type: none"> • Policy should be amended to reflect Tollgate appeal decision – revise WC1 re Strategic Economic Area and Policy WC2 to remove housing allocation on former Sainsbury's site. • Objection to Irvine Road site – poor or no access, ecological implications and better alternative sites available elsewhere. Whole site should be retained as a wildlife orchard. • Lack of evidence to support aspirations for increased bus use.
Sustainable Settlements		<ul style="list-style-type: none"> • Developers/landowners have proposed various sites in and adjacent to Sustainable Settlements as alternatives to those proposed in the plan. • Objections to Abberton and Langenhoe allocations – <ul style="list-style-type: none"> -No village amenities, not a sustainable location -Additional traffic detrimental -Loss of countryside, effect on wildlife in and around reservoir -Disproportionate addition to village -Negative urbanising effect on village setting and landscape character- more lighting, noise - Inadequate existing infrastructure, ie water and broadband • Objections to Copford allocations – <ul style="list-style-type: none"> Traffic levels already high in area. Housing numbers disproportionate to other villages. Impact on natural and historic landscape Alternative brownfield sites should be used. Queensberry Ave. specific points Access to new development through existing residential street not

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		<p>suitable – separate access required. Hall Road specific points Loss of woodland and river valley landscape rich in birds and wildlife. Site adjacent to Local Wildlife site. Not adjacent to village amenities. Poor access with insufficient width available to create two car width road with pavement. Development will compromise the setting of listed buildings.</p> <ul style="list-style-type: none"> • Objections to Fordham allocation – Loss of agricultural land Primary school capacity an issue. Negative effect on listed building Would add to safety concerns and congestion on Plummers Road • Objections to Great Horkesley allocations Negative impact on existing infrastructure and services ie road network, health provision and school. Area already has accepted sufficient development. Effect on wildlife. • Objections to Great Tey allocations Late addition to plan has meant consultation is inadequate. Lack of village amenities, jobs and services Increase in traffic – lack of public transport Sewage inadequate. Negative effect on conservation area, rural character Level of development disproportionate to small village.

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		<p>New Barn Road/Greenfield Drive specific points</p> <p>Problematic access through existing estate</p> <p>Extra traffic on narrow lanes.</p> <p>Negative visual effect on open countryside and views over Roman River valley.</p> <p>Loss of greenfield site, brownfield should be used.</p> <p>Environmental and wildlife impact.</p> <p>Further playing fields not required.</p> <ul style="list-style-type: none"> • Objections to Langham allocations <p>Level of development disproportionately high compared to other villages and compared with lack of services within village.</p> <p>Essential infrastructure needs have been unmet.</p> <p>Backfill estate type development would destroy special rural historic character.</p> <p>Water/sewage infrastructure already at capacity.</p> <p>Resident views gathered in surveys haven't been taken on board.</p> <p>School road development would exacerbate existing dangerous traffic management problems with school adjacent to business use.</p> <ul style="list-style-type: none"> • Objections to Layer de la Haye allocation: <p>Appropriate vehicular access needs resolution</p> <p>Development would stress existing limited community infrastructure.</p> <p>Negative effect on village character.</p> <p>Existing roads inadequate – more traffic will cause further pollution, noise and potential danger to pedestrians.</p> <p>Negative effect on local wildlife and habitats.</p>

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		<ul style="list-style-type: none"> • Objections to West Mersea Unique island position of Mersea reduces its development capacity due to access and environmental constraints. Infrastructure already constrained, ie health, schools, water/sewage, parking. New development would need to expand infrastructure. No evacuation plan for Bradwell. Extra sports facilities queried as appropriate planning gain for development. Loss of agricultural land. Housing numbers for Mersea queried due to year round residents in caravans. No justification for reducing land within Coastal Protection Belt. Impact on habitats and designated sites. Build on brownfield land elsewhere. Neighbourhood Plan will guide development. Dawes Lane specific comment- Widening of full length of Dawes Lane required. • Coast Road policy issues- Houseboats - Scale and density of proposed developments must be controlled to protect historic authenticity of the marine foreshore from large residential non marine development. Development of historic vacant sites could increase potential environmental hazard. • Caravan policy issues – Problems with incremental growth of caravans and year-round occupancy straining local infrastructure and adding to traffic

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		<p>congestion. Policy should be tightened up to limit further extensions of caravan parks.</p> <ul style="list-style-type: none"> • Objections to Rowhedge allocation – Loss of employment. Rowhedge has already accepted enough new housing. School capacity an issue. NE Essex CCG – Provision of healthcare being explored in context of new models for healthcare delivery, however no infrastructure formally approved yet. Location is peripheral to main village – lack of public transport. • Objections to West Bergholt policy Proposed area of growth doesn't fit within landscape objectives in Landscape Character Assessment. Negative impact on local facilities. • Objections to Other Villages and Countryside Policies Some small settlements considered to fall within 'other villages' rather than 'countryside'. Developers reps supporting greater flexibility for development in small settlements.
Development Management Policies		<ul style="list-style-type: none"> • DM8 Affordable Housing Deliverability of 30% target and lower threshold for rural areas queried by developers DM11 Gypsies, Travellers and Travelling Showpeople Cllr. Oxford -Capacity at Severalls Lane is 3 not 6 pitches.

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		<p>DM12 Housing Standards Developer concerns raised over evidence for enhanced standards for accessibility and space standards.</p> <p>DM19 Private Amenity Space Developer concerns over insufficient flexibility on amenity space standards.</p> <p>DM20 Promoting Sustainable Transport and Changing Travel Behaviour Public transport aspirations, including Park and Ride, are unrealistic. Better provision for electric vehicle charging points required.</p>