

Local Plan Sub-Committee AGENDA



THE PUBLIC MAY ATTEND THIS MEETING

Please note this meeting will be webcast and audio recorded

Date: Thursday, 11 June 2015

Time: 18:00

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

Membership:

Councillor D Bebb
Councillor L Bowers-Flint (Chairman)
Councillor G Butland
Councillor T Cunningham
Councillor D Hume

Councillor J Money
Councillor Lady P Newton
Councillor J O'Reilly-Cicconi
Councillor W Scattergood
Councillor 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 12th January 2015 (copy previously circulated).

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| 4 | Public Question Time
(See paragraph below) | |
| 5 | Local Plan Issues and Scoping - Consultation Responses | 4 - 41 |
| 6 | Proposed Criteria for Reviewing Development Boundaries | 42 - 45 |
| 7 | Essex County Council Sustainable Drainage Systems Design Guide | 46 - 49 |
| 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. | |

At the time of compiling this Agenda there were none.

PRIVATE SESSION

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| 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. |
|-----------|--|

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:

Local Plan Issues and Scoping Consultation Responses		Agenda No: 5
Corporate Priority: Securing Appropriate Infrastructure and Housing Growth Portfolio Area: Planning and Housing Report presented by: Emma Goodings Report prepared by: Emma Goodings		
Background Papers: Local Plan Issues and Scoping January 2015 Sustainability Appraisal Scoping Report January 2015 Full responses available online at www.braintree.gov.uk/nlpcomments1		Public Report: YES
Options: To note the comments received on the Issues and Scoping consultation		Key Decision: NO
Executive Summary: The Local Plan Issues and Scoping document January 2015 was the first public stage in the preparation of a new Local Plan in the District to cover the period to 2033. Consultation took place between January and March 2015 and there were 308 individual responses which have made up 1442 separate comments. A brief overall summary to each chapter is set out within the main body of the report and a further summary to each chapter is included within Appendix A . All comments are available to view in full on the website at www.braintree.gov.uk/nlpcomments1 Whilst it is difficult to make an overall summary of the comments that have been received, there was a clear focus from residents in particular that infrastructure and especially schools, health facilities, roads and public transport would need to be significantly improved before new homes could be built. All responses are being considered in detail by officers and will help form the decisions which are made as we move towards a Draft Local Plan at the end of the year. Further discussions with key stakeholders, landowners, Members and Parish Councils will take place as part of this process.		
Decision: To note the consultation on the Local Plan Issues and Scoping and the consultation responses which have been received.		

Purpose of Decision:	
To note the comments received on the Local Plan Issues and Scoping consultation and to ensure that these feed into the next draft of the Local Plan which will be produced at the end of the year.	
Corporate Implications	
Financial:	The cost of preparing the document and for the consultation will be met from existing budgets.
Legal:	Local Plan preparation must take place in compliance with the relevant legislation and guidance
Safeguarding:	None.
Equalities/Diversity:	The Council's policies should take account of equalities and diversity.
Customer Impact:	A public consultation period has been held on the document to inform the production of the Local Plan.
Environment and Climate Change:	Policies in the Plan as a whole will need to have regard to the environment and climate change issues.
Consultation/Community Engagement:	A public consultation period was held for 6 weeks. Further information in the main body of the report
Risks:	That the Plan is found unsound at examination.
Officer Contact:	Emma Goodings
Designation:	Planning Policy and Land Charges Manager
Ext. No.	2511
E-mail:	Emma.Goodings@braintree.gov.uk

1. Background

1.1 The Council is producing a new Local Plan which will guide development in the District to 2033. The new Plan will need to include policies on the provision of homes and jobs, the community facilities, retail and leisure facilities needed and the infrastructure required to support it. It should also deal with conservation and enhancement of the natural and historic environment.

1.2 A Local Plan Issues and Scoping Document was produced in January 2015. This was the first stage in the Local Plan process. The document highlighted some of the main issues which must be overcome in the next Plan and suggested a number of options for how this might take place. The document asked whether these were the right issues and strategies and if people wanted to suggest others for us to consider. It was the start of a conversation and public engagement on the Local Plan process. The Local Plan Issues and Scoping consultation was not site specific.

1.3 The Local Plan Sustainability Appraisal (SA) Scoping Report was also subject to consultation at the same time. The comments on that report and the amendments which they will generate to the SA assessment procedure will be considered at the next meeting of the Local Plan Sub Committee.

2. Consultation Procedure

2.1 A 6 week consultation period was held between the Monday 26th January and Friday 6th March 2015.

2.2 The consultation was promoted in the following ways;

- Scrolling banner on the front page of the Councils website throughout the consultation period
- A newly updated planning policy website with all information available to read and download
- Advertised on numerous occasions in the Braintree and Witham Times, Halstead Gazette and Haverhill Echo.
- Press releases
- Promoted through the Councils social media channels
- Posters distributed through Town and Parish Councils and displayed throughout the District
- Direct contact via email and letter to around 2,500 people and groups on the Councils consultation database
- Distribution of 'business cards' at commuter railway stations in the District with links and a QR code to the Local Plan (around 700 distributed)
- Copies of the Issues and Scoping Document and a summary leaflet were handed out.

2.3 Three drop in sessions/exhibitions were held on the proposals in Braintree, Witham and Halstead. Each was held between 4pm and 8pm in one of the main halls in the towns. An exhibition was available, along with plans, maps and other evidence and background documents. At least three officers were available at each session to talk to those attending. Around 250 people attended across the 3 sessions. The Witham exhibition also included a workshop and briefing session on the Sustainability Appraisal which was presented by the consultants carrying out this work.

3. Number of Comments Received

3.1 A total of 308 individual responses were received to the consultation. These were from a wide range of groups and individuals including residents, businesses, landowners and their agents, statutory consultees like Historic England (formally English Heritage), other local authorities and Parish Councils, both inside and outside the District. The responses have then been broken down by topic area, resulting in 1442 comments which are recorded against different parts of the Plan.

3.2 Responses were encouraged directly onto the Council's online consultation system 'Objective' but were accepted via email and letter. Of the 1442 comments, 362 were directly onto the portal, 948 via email and 132 by letter. All comments are added to the consultation system and therefore comments received by letter must be manually typed onto the system, which can slow down the processing of comments.

3.3 All responses are available on the BDC website at the following link www.braintree.go.uk/nlpcomments1 and we would encourage all Members to read the comments.

4. Contents of the Comments

4.1 The Local Plan Issues and Scoping was not site specific, but a number of the comments to the Plan related to commentary on specific proposals which had come forward in the Call for Sites. The site specific comments are available in full on the website alongside all the comments, but have not been included within this summary. However any wider issues around infrastructure or the spatial strategy in general have been summarised as these do relate to the consultation.

4.2 Colchester Borough Council had a Local Plan Issues and Options consultation available at a similar time to the Braintree document which contained the possibility of a new settlement on the border of the two authorities. A number of groups and organisations wrote to both authorities regarding this proposal and so not all comments may be relevant to the Braintree District.

4.3 A brief overview of the comments on each chapter of the Plan is set out below and a more detailed summary is set out in **Appendix A**. All responses are available on the BDC website at the following link www.braintree.go.uk/nlpcomments1 and we would encourage all Members to read the full comments.

Theme: A Prosperous District

A Strong Economy– Comments mainly related to the best location for employment and business uses in the District, that housing, jobs and infrastructure should be considered in a wholesale way and the availability of school places and training was very important. There was generally support for businesses in more rural areas providing there were minimal highway impacts.

Shops and Services - Parking concerns and the health of main town centres were the main issues raised by respondents. A preference for locating new retail development within the main town centres was shown. Rural shops and services should also be protected and expanded to serve local need.

Homes - Concern was raised over the level of housing growth in the District and that existing services and the transport network would be unable to cope with any further development. No consensus for where housing should be located was apparent with support for and against all options.

Transport and Infrastructure – Transport infrastructure and in particular the congestion on both the strategic and local road network was one of the key themes in the responses that were received. Issues around congestion and availability of rail services were also mentioned, alongside the availability of broadband

Theme: Creating Better Places

Community Facilities - The focus of the responses was split between how existing facilities need to receive ongoing support/funding and that new development must be supported by the appropriate facilities that need to be provided in a timely manner, and that promises to provide them must be kept.

Creating high quality spaces - Support for the protection of the historic assets and the landscape of the District was clearly evident, along with the protection of existing open spaces within the urban areas. Support for good design which reflects local vernacular style was also mentioned frequently.

A Healthy and Active District – Many comments in this section related to the pressing need to ensure sufficient health facilities for both new and existing residents. Comments also related to ensuring that existing and new open space was usable and that appropriate housing was provided for an aging population.

Theme: Protecting the Environment

Climate Change and Renewable Energy - There is widespread support for the aim of improving the sustainability of development, increasing renewable energy generation and flood prevention measures. However, differences in opinion arise in how to achieve these aims together with concerns about possible harmful impacts

Nature conservation and landscape character – Comments were concerned about the loss of open space, countryside and habitat which can support wildlife. Many comments were related to specific sites that had been submitted in the Call for Sites

4.4 In May the Council received a petition from the Kelvedon and Feering Heritage Society signed by 574 people. The petition was headed as follows;

“We, the undersigned, ask Braintree District Council not to allocate substantial new housing development to Kelvedon, Feering and surroundings under the new Local Plan, as we consider it would destroy the village character and rural setting of the villages and overload road and rail infrastructure. We also ask Braintree District Council not to co-operate with Colchester Borough Council in releasing development land within Braintree District to form an extension to Colchester’s proposed new settlement at Marks Tey”.

Whilst not received as part of the formal consultation process, we would like to make Members aware that this petition has been received.

5. Conclusion

5.1 The Local Plan Issues and Scoping document was the first stage in producing the new Local Plan for the District. Consultation on the document was in a 6 week period ending on the 6th March 2015. A strong communications strategy sat alongside the Plan and feedback on this was positive. 305 individual responses were received and resulted in 1442 comments separated out by topic.

5.2 Whilst it is difficult to make an overall summary of the comments that have been received, there was a clear thrust from residents in particular that infrastructure and especially schools, health facilities, roads and public transport would need to be significantly improved before new homes could be built.

5.3 Officers would agree that this is absolutely a fundamental part of the Local Plan process and we will be working with those who provide these functions very closely throughout this process, alongside all other key stakeholders

5.4 All responses are being considered in detail by officers and will help to inform the decisions which are made as part of a Draft Local Plan at the end of the year.

Recommendation

To note the consultation on the Local Plan Issues and Scoping and the consultation responses which have been received.

Appendix 1 – Summary of Comments Received

A Prosperous District - A strong economy

This section covers the economy of the District, how and where we can attract and build sites for new businesses and what sort of businesses they will be. It also includes consideration of the opportunities for tourism and the quality of education at both school and continuing education as adults.

A total of 195 responses were recorded against this chapter. Some people have raised issues over infrastructure, roads etc. These have been dealt with in the Transport and Infrastructure chapter. The main issues raised in the consultation responses are summarised below;

- Support the Council's desire for a strong economy and the goal of attracting new businesses and jobs to the area
- Essex County Council supports reference to securing a strong economy and will seek to implement the vision and objectives of the Economic Growth Strategy for Essex
- The Plan should consider the area's role and geography within the London – Stansted – Cambridge growth corridor which has the potential to drive growth nationally and locally and which is not currently considered in the Plan
- There are two major opportunities for economic growth, around Braintree because of its links to Stansted and the A12 corridor with its excellent road and rail links
- Reference should be made to the employment aspirations of settlements such as Haverhill and Bury St Edmunds
- Braintree is poorly related to potential markets and customers
- Achievement of higher levels of employment new business sites and the establishments of better regional employment markets are also an issue for the Plan
- Need to offer more choice of employment locations to the market
- BDC needs to redress out commuting by creation of new employment opportunities alongside new housing to encourage sustainable patterns of travel
- A comprehensive approach to homes, jobs and infrastructure must be reflected in the Council options
- Options should reflect the need for a wider, longer term co-ordinated approach
- BDC should consider large scale urban expansion in sustainable locations next to road and rail
- There is insufficient consideration to generating employment or building infrastructure to support economic growth
- Does not afford sufficient emphasis to the role of mixed use
- Andrewsfield Garden Village has the potential to provide significant, sustainable, rural employment opportunities
- Standalone new settlements are unsustainable due to lack of employment opportunities and will be commuter dormitories with poor communications
- Delivery of housing is fundamental to ensuring economic growth
- Jobs must be near to development and accessible by foot, bike or public transport

- New businesses will only be attracted to the area if there are sufficient homes to ensure a reliable local workforce
- It would be wrong to attempt to control new housing to match job growth but should provide a range and choice
- Should encourage residential development next to employment growth
- Need to include employment sites away from residential development and near to major roads
- The Council should look at brownfield sites to meet employment needs
- There is too much focus on employment within the B use class and not other sorts of employment such as retail
- Refurbishing rural business units should be included
- Consult with business leaders on how to attract new businesses to the area
- Employment sites in rural areas should only be created where there are adequate transport links
- Suitable sized and located development within or adjacent to villages contributes to a strong economy
- Empty units should be brought back to life with incentives given to owners
- Support rural employment development but only where this can be carried out in a sustainable manner
- Should support and maximise the opportunities to rural employment
- Oppose major new employment sites in rural areas
- Previously used agricultural buildings no longer fit for purpose can provide employment opportunities
- Is the rural road network suitable for the associated vehicle movements of rural employment locations
- Development of businesses in the countryside should not be restricted to 'rural' businesses
- Support the development of equestrian related businesses.
- Need an economic support plan to create quality jobs
- Need to organise retraining for those who will have worked on the land that is to be built on
- Should we offer a financial package to get qualified doctors, teachers and others to the area
- Where will these people work as there are no big employers in the District
- Jobs creation is fundamental to a successful and sustainable Local Plan
- The Council should support economic development and new jobs, not just those in the B use class
- Should promote the District as a tourist destination
- High speed broadband is essential for new businesses in an area
- Existing highways infrastructure should be identified as a constraint in the economic section
- Technology should be encouraged
- Commitment to primary and secondary schools needed
- Agree that sufficient school places are an issue
- Essex County Council will work with BDC on assessing and accommodating anticipated pupil changes.
- Council should link growth to the availability of school places
- New learning centres should sit alongside employment to support the type of industry on that site

- It would have been helpful if the Council could include the evidence that it has gathered on the likely amount of growth required throughout the Plan period

Officer Comments on a Strong Economy

The Council has commissioned specialist consultants to carry out an Employment Land Needs Assessment for the District which will shortly be complete. This study is looking at the suitability of existing employment areas in the District and forecasting the likely requirements for jobs and employment land in the District over the next plan period. Consultation with local businesses and agents has taken place as part of that process.

As set out in their response to the Local Plan Issues and Scoping Essex County Council are committed to working with Braintree District Council to provide the necessary school places to meet the demands of new development.

A Prosperous District - Shops and Services

This section gives an overview of the current retail hierarchy of the district and how it supports the provision of shopping, leisure and employment as well as providing services and act as centres for people living in the area.

Further work will need to be done on the retail evidence base for the new local plan, in order to determine the likely level of retail provision required up to 2033. The distribution of any new retail provision will need to be closely linked to the overall housing strategy for the district, in order to ensure that it meets new retail demand in the right way and in the right locations. Existing opportunities in the town centres will have to be explored to ensure that they contribute to the likely increased demand for retail floor space as the National Planning Policy Framework advocates a town centre first policy.

For question 4a – 42 comments were received, 6 of which were from statutory consultees and parish councils.

For question 4b – 29 comments were received of which 3 were from statutory consultees and parish councils.

Responses to question 4a

- A large theatre should be provided to draw people in as well as more shops;
- Allowing major supermarkets to set up is a problem for small business;
- Embrace the towns uniqueness rather than become a clone of Chelmsford;
- Encourage large department store in town;
- Expand Freeport;
- Enforce existing parking restrictions;
- Where will people park in Braintree town centre;
- Free parking in towns;
- Multi story car parks with easy access to town should be provided;
- Mixed use development not helpful;
- Markets only help to a limited degree;
- Too many one way streets which confuse visitors;
- Too many bookmakers, estate agents and restaurants in Witham town centre, need more shop types;
- The new Local Plan should focus growth on existing town centres;
- Additional towns in the centre should provide a mixed use 24 hour environment;

- The impact of internet retailing on town centres needs to be considered;
- Retailers are also avoiding high street locations due to various problems from operating from a traditional high street;
- Access to shopping destination has to be safe;
- We should also include Cultural Facilities;
- More support/safeguarding needed for rural shops, services, and pubs;
- The threshold for impact assessments for town centres should be reduced to 1000 sqm to take into account competition for smaller discount brands;
- Differentiate between out of centre retail and rural shops and services;
- Development in rural areas can help sustain local services;
- Flexibility required for appropriately retail development to serve the existing and new populations;
- Maintain viable town centre business with tax breaks;
- The health of an area is down to how well its centre is doing;
- A healthy mix of business and shops is required to keep Halstead town centre healthy;
- Current strategy is probably not plausible given the level of housing growth needed;
- Support local shops by not building large shops out of the centres;
- Braintree should build on the success of Freeport and the retail park and accept that large volume retailers aren't going to locate within the town centres;
- The town centres should be for cultural, heritage, health and community focussed;
- Markets should be encouraged as they add colour and variety, and attract customers to the centres;
- Need to get more people shopping locally and reduce expenditure leakage;
- Support for the provision of local shops, facilities and services;

Responses to question 4b

- More retail provision is required to prevent expenditure leakage;
- Bring empty shops back into use;
- Increase the size of George Yard and increase car parking;
- Have market in one area;
- Out of centre retailers should pay the same as town centre retailers;
- A cultural venue would be beneficial;
- Increased out of town provision will risk further losses of business in the town centres;
- Parking charges harm town centres and should be free;
- Mixed use developments can make town centres safer and boost the evening economy;
- An increase variety of shops is needed;
- Shops need to meet local demand;
- Establish what local needs for shops are;
- No more major out of centre development;
- Out of centre is not environmentally friendly and encourages car trips;
- Offer affordable rents to empty shops;
- Policies on living and working in the town centres should be key;
- Retirement property in town centres;
- Need more town centre parking and free parking after 2pm;
- Promote the individuality of town centres;
- Support restaurants and pubs in town centres;
- Support local shops, pubs and restaurants and tourist accommodation in rural areas;

- Sites in rural areas can support local village services;
- Development should be walkable distance from town centres;
- Development space is limited in Braintree town centre and out of centre provision is likely required;
- Correct option is to allow out of centre development if there are no suitable and available, sequentially preferable sites and if the impact is acceptable. The Council must understand the 'real world' constraints that can make sites unsuitable for retail development;
- Access to centres and public rights of way is important;
- No need to increase out of centre provision.

Statutory Consultee Comments

Comments were received from the following statutory consultees and local authorities; Essex County Council, Colchester Borough Council, Feering Parish Council, Historic England, Sturmer Parish Council, Great Saling Parish Council,

- Rate relief should be given to new businesses in town centres;
- Don't spend public money on town centres but make parking free and access easier;
- Efforts to retain and enhance the vitality and viability of the town and local centres should therefore be linked to the conservation and enhancement of its historic environment (Historic England);
- Support for cross boundary working (Colchester/Essex CC);
- Increased provision for local shops as they reduce car journeys and support local business;
- Don't spend public money on town centres but make parking free and access easier;
- The Local Plan should ensure that new retail and regeneration sites are sustainably located and avoid harm to heritage assets (Historic England);

Officer Comment on Shops and Services

The provision for new main town centre uses to support growth in the District will need to be determined through the retail evidence base. This document will enable the Council to determine the likely level of retail and main town centre uses growth needed in the District. Retail provision will be closely linked to the housing strategy, as new retail growth needs to be located in the areas which will serve new housing developments most effectively. This could include a range of options such as expanding the town centres to provide for growth in the main towns. Or if a new town were proposed then an appropriately sized retail provision would need to be located in that area. Urban expansion would also likely justify smaller local shops to serve that development on a top up basis.

An interesting point was raised regarding impact thresholds for out of centre retail developments. The NPPF sets this default threshold however the retail evidence base could indicate that a lower threshold was required for different centres in the District.

A Prosperous District - Homes

The Council's Issues and Scoping document section on homes outlines the national policy position for the provision of new housing and the challenges the District will face to meet objectively assessed housing need.

The Council has to significantly increase housing supply. In its Core Strategy (2011), the yearly target was 272 new homes per year. The Council is currently working on the assumption that objectively assessed housing need will be in the region of 750 to 950 new dwellings per year for a 15 year plan period. It is however crucial that the level of new homes and the provision of local employment opportunities keep pace with each other in order to promote sustainable growth.

An increased supply of housing is not just the only issue, as affordability of housing is a key consideration, homes which are suitable for all ages, and the sufficient provision for Gypsy and Travellers.

For question 5a a total of 231 comments were made.

For question 5 b a total of 77 comments were made.

The largest group comment were members of the public with over 170 comments, 60 developers or their agents, 21 stat consultees and 8 other groups (Numbers will not tally as multiple comments were made by one person or group).

A large number of comments received were in relation to specific sites which have been put forward through the Council's Call for Sites. Individual sites were not subject of this consultation; however any general issues raised have been included in the bulleted list.

Responses for question 5a

- Priority of development on brownfield sites;
- Development should be near major towns;
- Development should be for new towns on edge of district;
- Only 10% of new development should be directed to villages;
- Opposition to new settlements option;
- Development should be in locations which would support and pay for new infrastructure;
- Opposition to loss of countryside and greenspace;
- Concerns development would have on infrastructure and services such as highways and congestion/education/doctors/health care/Police/lack of public transport and rail connections etc.
- Limited access to railway lines;
- Area would need more employment to support housing;
- Loss of farmland;
- Heritage assets would need to be protected;
- Important landscapes should be protected (Particular reference to the Brain Valley being designated as a ANOB);
- Loss of wildlife and habitats;
- Protection of wildlife;
- Areas of low landscape value should be developed;
- Local people should decide where development goes;
- Support for the issues and that they summaries the districts challenges;
- Concern over increased pollution;
- Building should be reduced until all brownfield sites are built;
- Villages should not be dwarfed by new housing;
- Upgrading infrastructure should be a pre-condition for development;

- Consideration should be given for the unmet housing need in adjacent authorities and whether the district could accommodate it;
- Large sites have a long lead in time and should not be relied on for a 5 year housing supply, small sites should be allocated to ensure a constant housing supply;
- Concentrating development on larger towns and villages is a sustainable option;
- Education may suffer due to overcrowding;
- Not as much growth needed as Stansted is not expanding;
- Development should help retain local services;
- Insufficient brownfield sites area available to meet all the required housing growth;
- The Local Plan period is not entirely clear within the document;
- Re-use redundant and vacant properties;
- Towns should not be dormitories;
- Sustainable development should be a priority;
- Improvements should be made to walking and cycling routes;
- All building plans should be reduced until brownfield sites have been developed;
- Town bypasses will be needed;
- Projected housing numbers are simply unsustainable;
- Proximity to employment should be a factor in decided new homes location;
- Small limited development in villages should be considered;
- More affordable housing should be provided in particular 1 and 2 bed accommodation;
- A proportionate approach to housing number should be used depending on village size and service provision;

Responses for question 5b

- New proposed option – “New homes should be encouraged as a suitable alternative to employment uses on previously developed land where appropriate.” (*Officer Response – Changes to permitted development rights for B1 uses, enables the change of use to residential without the need for planning permission. For other employment uses, the Council will need to complete its analysis of employment land provision for the district before making any decision regarding the future use of underused or derelict employment sites.*);
- Brownfield sites first, then secondary sites as new villages;
- Development built in existing towns where the infrastructure and facilities are;
- Stop housing for people outside the district;
- All new houses should be to the highest environmental standards;
- Only look at new sites not old sites which have been previously rejected;
- New development should be built where it can fund new infrastructure;
- Build close to main transport routes;
- More smaller social houses needed in Witham;
- New towns and new villages seems the sensible option;
- Development at the existing towns and villages;
- No large new towns;
- Disperse development throughout the district;
- Stop being negative about house building;
- BDC should facilitate development on its own land/public land for sustainable urban development;
- Support for development in or adjacent to the main towns and villages as it is more sustainable;

- Agreement with the main options which support development in sustainable locations;
- No development in smaller villages as they have no services;
- Public transport is a unrealistic option;
- Level of housing growth proposed is unsustainable;
- Developers should fund new rights of way;
- Don't build large detached houses as they are unaffordable;
- Affordable housing only sites are unsustainable and should not be considered;
- Options should be linked to transport and infrastructure provision;
- A combination of development at existing main towns as well as villages should be considered so the countryside is not preserved in aspic;
- New garden villages preferred;
- Witham development could part fund a northern ring road;
- Developers should provide more bridle ways as well as major infrastructure;
- Align development with wider employment and transportation strategies;
- Development in smaller villages should be in keeping with the local character;
- Consider re-development of employment which is no longer fit or viable for use;
- Include provision for urban extensions;
- Individuals shouldn't have to finance subsidised housing;
- More housing should be provided;
- Funding for infrastructure will have to be considered as pooling is no longer an option;
- More housing will make the area a dormitory;
- Car based transport is not sustainable development should be in sustainable locations such as underused employment sites.

Statutory Consultee Comments

Comments were received from the following statutory consultees and local authorities.

Essex County Council, Sturmer Parish Council, Black Notley Parish Council, Long Melford Parish Council, Basildon Borough Council, Rivenhall Parish Council, Highways Agency, Feering Parish Council, Finchingfield and Cornish Hall End Parish Council, Stisted Parish Council, Rayne Parish Council, Great Bardfield Parish Council, Maldon District Council, Wickham St Paul, Coggeshall Parish Council, St Edmundsbury Borough Council, Colchester Borough Council, Historic England, Great Saling Parish Council, White Colne Parish Council, Stebbing Parish Council, Uttlesford District Council, Sturmer Parish Council.

- Acknowledges that we are seeking to meet housing needs over full plan period;
- Braintree needs to consider at combination of options for housing growth;
- ECC will need to be satisfied that the impact and distribution of growth can be accommodated by ECC area of responsibility, or identify additional facilities or mitigation to make the strategy sustainable;
- Brownfield development should take place before greenfield development;
- New housing development should be proportionate to the small rural villages and existing communities should not be swamped;
- Developer tariffs should include all types of housing and affordable housing;
- Co-operation between authorities is important and should be proactive and transparent involving both Members and Senior Officers;
- The Council may still be approached by other authorities which are unable to meet their own assessed housing need due to constraints such as Green Belt;
- Additional growth will have significant implications for infrastructure and services;

- The A12 and A120 are already running close to capacity, it is likely modelling work will indicate that upgrading will be required. Growth should be focused on the north and west of the District until the situation regarding highways becomes clearer;
- Sewerage and utilities should be available in areas to be developed;
- Need a mechanism to ensure development is able to contribute toward infrastructure requirements;
- Need to protect identity of villages so urban sprawl is minimised;
- New homes should be within walking distance of infrastructure or with a quick and reliable bus service;
- Growth should be focused on existing towns and must have A120 improvements;
- Provision of age appropriate housing and flexible living spaces would be well received;
- Scale of growth which has taken place at the local level should be taken into account;
- Local housing need should reflect local circumstances;
- No objection to potential housing but considers that appropriate highways solutions to reduce congestion should be sought;
- ANOB extension should be a priority in the new Local Plan;
- Close co-operation is required among neighbouring local authorities during the production of the new Local Plan;
- Any impact on the historic environment would have to be fully considered;
- Will work closely with Braintree in the evaluation of proposals close to or straddling the district boundary;
- A small number of affordable houses may be appropriate in the smaller villages;
- Gypsy and traveller provision should be provided with the full agreement of the surrounding community;
- Infrastructure should come before development;
- Heritage implications should be fully explored when selecting appropriate development sites;
- Options should be explored to ensure that they are capable of accommodating the required growth level.

Officer Comment on Homes

Officers are continuing to work on the Council's objectively assessed housing figure as well as commissioning evidence base which will help determine the most appropriate strategy for housing growth in the District. The comments received here will help inform the spatial strategy and meetings with local Councillors and Parish Councils will take place as part of this process.

A Prosperous District - Transport and Infrastructure

The Braintree District is a large and predominately rural District therefore car ownership is high. There are particular roads or junctions that can become congested at peak times. Transport and congestion can have a negative impact on air quality. Public transport can be limited in rural areas and in the evening. We need to ensure public transport is accessible and available to all. Fragmented cycleway networks are available in mainly Witham and Braintree. Braintree District Council has a good working relationship with Highways Agency and Essex County Council.

The District has identified a number of key priorities for infrastructure including, connectivity between Braintree and Colchester, junction improvements on A12 and other main roads,

Braintree rail loop, public transport access to Stansted airport and availability of broadband coverage, which is a key issue particularly in rural areas.

Comments in relation to water and energy are considered under the Climate Change and Renewable Energy chapter.

Total Number of Comments = 254

6a Issues (214) + 6b Options (40)

32% of the comments were relating to call for site submissions at Feering, Kelvedon, Great Sailing, Hatfield Peverel, Bocking, Braintree, West Tey, Andrewsfield, Silver End, Coggeshall.

Summary of further representations received

Traffic

- Roads around Braintree cannot cope with huge amount of traffic, gridlock at peak times.
- Traffic control measure should be introduced to manage the movement of HGV's through urban and rural road network
- Hatfield Peverel and Nounsley can't take any more traffic.
- Stoneham Street and Tilkey Road are congested.
- Kelvedon and Feering both have high streets that are largely residential. These are already very overloaded with cars and lorries. Impact on Conservation Area.
- Gore Pit Corner (Inworth Road/Feering Hill Junction) is irretrievably over-used already.
- A131 is gridlocked.
- New developments within neighbouring authorities will add to the congestion of existing through routes to major road links
- Efforts to limit car use by creating safe cycle paths, footpaths and reliable and affordable public transport should be encouraged.
- Do not support building more and bigger roads we do promote measures which will increase road safety and good health

Commuting

- Daily commutes are increasing.
- Make Braintree branch line commuter friendly, more frequent service.
- Commuters drive to Witham Station instead on using Braintree Branch Line more reliable frequent service.
- Additional issue: Is there sufficient car parking at railway stations?
- Need to assess the likelihood of some of these (modest) ambitions actually being achieved - e.g. the Braintree Rail loop
- Whilst focussing new homes on the existing public transport / rail network would have some sustainability benefits it is important that sustainability is considered holistically. There are a number of areas of the District that are currently relatively poorly served by public transport
- Trains are at and over capacity.
- **Kelvedon and Feering Heritage Society** - imperative options are used in conjunction with road/rail that has better capacity and access.
- Braintree - Stansted rail link needs much higher priority; in turn would link with London and Cambridge

- **Witham and Braintree Rail Users Group** - Agree on the provision of a loop on the Witham Braintree rail line. There must also be provision for extending the line onto Stansted Airport via Dunmow and a study is needed to be done on the possibility of restoring the Witham Maldon rail link.

A120

- Concern about volume and speed of traffic on and around the back roads of Great Tey and on the A120.
- Existing A120 does not have the capacity to safely carry the existing traffic, and until duelled or by-passed completely it would be ludicrous to put it under even more pressure.
- Decision on the duelling of the A120 between Marks Tey should be made and its final route decided before any major developments are planned and built
- Andrewsfield - all the transport dependant on an already overcrowded road system. No easy access to the Rail. No access to A120 at present for cars they travel either to Great Dunmow or Braintree to join the main road (A120).
- Improve A120 in particular the black accident spot coming from Earls Colne into Coggeshall.
- Gateway 120 will secure improvements to, and dualling of, the A120 between Braintree and the A12 to improve safety reliability and encourage inward investment.

Bus

- Developments need to make use and build upon greener modes of transport
- Additional issues: Improvements to infrastructure should be built before or at the same time as new home
- Option for better utilisation of existing public transport corridors and public transport connections is not expressly made.
- Bus service is insufficient.
- No official bus service between Coggeshall and Kelvedon.
- Public transport in Kelvedon/Feering is limited and train expensive.
- Improve public transport provision for key health facilities such as hospitals.
- Improvements to transport in rural areas not just Monday to Friday.
- Silver End, bus service in and out of Silver End is very unreliable.
- Bus services to and from Halstead must be improved.
- Additional options: Encourage and provide financial support for community transport schemes for commuters. Encourage car sharing

Cycleways

- Cycleways must be developed from point to point possibly using existing footpaths.
- We need more cycleways.

A12

- Volume of traffic travelling from A12/Tiptree via Kelvedon/Feering is not sustainable.
- Need bypass for Coggeshall and Tiptree to A12.
- A12 upgrade must not go ahead and waste public money ahead of the unknown traffic issues that will arise from the West Tey development
- A12 at capacity.
- Development should be focussed on the A12 road/rail investment corridor.
- As the Highways Agency, determine roads policy, a concerted effort from the District Council will be required to obtain the necessary progress on the crucial question of the A120/A12 route and timetable for building it, in conjunction with the recently announced A12 improvements.

Specific Sites

- Developing the north west of Braintree a road could be constructed from the Sudbury/Halstead roundabout to join the new planned development that would join the existing road system at the Springwood.
- **Braintree and Bocking Civic Society** - the fields closest to Braintree to the south of Flitch Way need to be preserved as open spaces.
- West Tey development would put too much traffic on already congested local roads.
- Estate roads built in 50/60/70's are proving too narrow
- Everyone has forgotten why the Sorrels Field development was put forward. It was put forward as a solution to the traffic of Arla Dairies passing through the village.
- Site CASH 168 Sudbury Road, Castle Hedingham– Does not meet NPPF criteria that New Homes should be built on the existing public transport network to encourage sustainable travel.
- New Flitchway Settlement scored very well for ...connections to public transport, promoting accessibility, extensive network of existing footpaths and cycleways. Various highway access options are likely to be available.

Broadband

- Parts of Marks Tey and many smaller local rural communities do not get Broadband signals.
- Smaller rural communities will never get broadband as the costs to dig the road for new fibre exceed the possible revenues due to the lack of density in the population.
- Commitments need to be in place to make sure that a new exchange will be built that will support high speed internet in any new development.
- High speed internet is essential for any new business that may potentially look at the area.
- Make specific reference to broadband in rural areas.

Funding/Infrastructure Provision

- Section 106 payments etc. for [these] developments does not justify giving planning permission at the expense of local residents.
- Infrastructure needs to be built first and paid for by the developer.
- Develop a tariff approach may be fine in broad terms but where sites are delivering essential infrastructure there is a danger of a double 'whammy' funding which can make schemes unviable.
- Continue to negotiate contributions to infrastructure on a site by site basis – this option needs to be reconsidered in light of the proposed changes to S106 pooling of contributions due post April 2015.
- We are concerned by the option of a tariff whereby each new home pays towards infrastructure if this relates to major infrastructure projects which do not relate to or benefit the homes.
- Developer contributions to infrastructure should be considered on a site-by-site basis, and based on viability, rather than a fixed tariff cost.
- Clarity on the role of Braintree's intended CIL should also be made within the Draft Local Plan.
- Only large scale new mixed use developments will create the critical mass to provide essential infrastructure to meet needs of new and existing residents.
- Upgrading infrastructure should be a precondition for development.
- Confirmation of infrastructure in place before any large housing development was agreed.

- Braintree has experienced an 11% uplift in population without any improvement to the local infrastructure. Must get a firm commitment from central government to provide infrastructure funding
- Developers cannot be expected to fund the infrastructure catch up and future needs because their profit margins will not permit it.
- A detailed plan for improving the infrastructure for the whole area of Bocking should be shown.
- BDC must work with Essex County Council, National Government and the relevant bodies to ensure that a strategic infrastructure plan is in place.
- Whilst we recognise the key role major development will play in securing improved transportation infrastructure, we are sceptical that major trunk road schemes can be delivered on the back of new settlements.
- Danger is that commitments are made to the large scale release of greenfield sites simply to underpin investment in an inadequate trunk road without any demonstrable case that such constitutes sustainable development
- Infrastructure costs could be argued to be so onerous that they will justify reduction of contributions/investment in other much needed local facilities.
- If new settlements are to remain on the agenda as an Option for future growth, it should first be demonstrated that such schemes are viable and deliverable.
- Infrastructure should not be piecemeal and must be realistic about long term infrastructure requirements.
- Current utility infrastructure should also be considered;

Miscellaneous

- Measures to promote sustainable transport for all new developments and conditions attached to permission must also be rigorously enforced
- The infrastructure of our towns is not keeping pace with the population
- The lack of infrastructure in this area to cope with such an increase (West Tey).
- Acceptance of a lack of infrastructure is offset against desire to live in the countryside; lifestyle choice
- Future large scale development would have to accommodate new schools, community centres and doctor's surgeries otherwise the existing infrastructure will definitely implode.
- Building on a large scale would require other aspects of infrastructure, such as drainage, water supplies, telephone cables and other technical additions
- Power cuts in Kelvedon/Feering over past 10 years; additional pressure on utility providers/services
- Kelvedon does not have sufficient infrastructure to support more occupants.
- Reposition the speed camera on the approach to Great Tey village to alleviate speeding.
- Developments of more than 25 should be prioritised according to the degree of impact on infrastructure.
- By just adding developments to existing overcrowded areas you will cause problems for thousands of people with delays getting to work
- The plan options which support the development of mixed use schemes in locations which have good accessibility to services, facilities, jobs and public transport are supported.
- Main routes through Halstead should be considered.
- Use of car is inevitable.
- Ensure new major roads are defined and safeguarded before development.

- Horses should be given the same consideration as other means of transport.
- Development on A1089 (the Braintree to Witham road), will cause an over-capacity on this road.
- Lack of adequate parking in developments encourages parking on pavements.

Statutory Consultees – Summary of representations

- **Colchester Borough Council** - Joint cooperative working will have to be undertaken with adjoining LPAs and the County Council to discuss the transport and infrastructure requirements that may emerge as the result of any potential cross-boundary strategic housing allocations.
- **Rayne Parish Council** – Requires significant investment, co-ordination and high-speed Broadband
- **Black Notley Parish Council** - The road structure in Black Notley has been put under pressure due to the increase in vehicles through the village
- **Chelmsford City Council** -. The Local Plans of local authorities in the vicinity should be consistent in helping to bring the essential A12 improvements to fruition. Delivery of a new North East Chelmsford bypass should be featured in the document as a key cross boundary piece of infrastructure. Increasing capacity on the Braintree Branch by a new passing loop is supported and would help improve access to Chelmsford as well as London
- **Rivenhall Parish Council** - inadequate infrastructure provision within the areas of Witham and Rivenhall, major expenditure to improve highways, to alleviate the existing pinch-point at the Witham Railway Station Bridge, to provide additional car parking for commuters in Witham and the total reconstruction of adequate access and egress to and from the A12 at both Witham and Rivenhall End.
- **Great Bardfield Parish Council** - Support improvements to the transport system Braintree 'loop' rail link. Poor rural transport causes an imbalance in access to a range of opportunities.
- **Coggeshall Parish Council** - infrastructure should be give greater prominence within the document. Important for improvements to infrastructure and services to be made before any substantial new housing projects are considered.
- **Finchingfield and Cornish Hall End Parish Council** - Support improvements to the transport system and Braintree 'loop' rail link. Poor rural transport causes an imbalance in access to a range of opportunities. The availability of high speed and reliable Broadband is essential.
- **Feering Parish Council** - Infrastructure before homes not after or never. Encourage more alternatives to one person car journeys but do not limit car parking as this kills centres and local shops
- **Stebbing Parish Council** - considers that transport should have a minimising impact on the character of our rural areas and believe that developing an area the size as shown in this scoping report will bring a dramatic increase in car movements/usage, with no guarantee of public transport.
- **Great Sailing Parish Council** - Walking is not an option in a community that lack both street lights and footpaths.
- **Stisted Parish Council** - It is vital that Braintree District Council ensure that its partners at Essex County Council and the Highways Agency develop a strategic vision for the A120 based on both local and regional needs and not allow themselves to be influenced by the vested interests of any landowners or developers.

- **Essex County Council** – Existing highway mitigation at Braintree and Witham to support growth outlined in the Core Strategy are still required. ECC requests further discussion with Braintree DC concerning any commissioning of highway modelling to support the new Local Plan.

Given the proximity of strategic corridors along the A120 and A12 early discussion will be necessary with the Highways Agency. Any modelling will need to identify potential impacts and mitigation arising from the growth strategy options, particularly proposals for new settlements and cross border developments, and potential impacts beyond its administrative boundaries.

ECC would support strong policy references for sustainable transport incorporated into the new Local Plan to ensure consistency with the NPPF.

ECC continues to work in partnership with Braintree DC to seek funding, and lobby for the delivery of the Braintree rail loop (at Cressing).

High Speed Broadband: ECC would seek a specific policy in the new Local Plan regarding improving the telecommunications network.

ECC as Waste Planning Authority will continue to work with Braintree DC to integrate the need for waste management with other spatial concerns in the preparation of Local Plans.

Development proposals will be required to maximise opportunities for the creation, restoration, enhancement, expansion and connection of Green Infrastructure and connection of the development site to the local Ecological Network.

Highways Agency - The District is primarily rural in nature with just three larger urban areas, Braintree, Witham and Halstead. This makes the provision of sustainable transport in the District challenging. We note and support the aspiration to improve public transport links to Stansted Airport. The A12 and A120 are already running close to capacity. It is highly likely that modelling work, yet to be undertaken in support of your plan, will confirm that upgrading of the A12 and A120 will be required.

The Roads Investment Strategy published by the DfT in December 2014 committed the Highways Agency to widening the A12 between J19 Chelmsford and J25 Marks Tey as well as the introduction of traffic technology, which are to be developed during the next road period.

The Roads Investment Strategy has not identified the A120 for improvement, which means any development that loads on to the A120 will need to fully fund necessary capacity improvements unless alternative funding is identified. For these reasons the Highways Agency feel it may be better to focus growth to the North and West of the District, at least until the situation regarding the future upgrade of the A120 becomes clearer. We welcome working with you on the transport evidence base as the local plan develops.

Historic England – Any improvements along the A120, A12 and other transport infrastructure should have regard to the impacts of heritage assets.

Officer Comment on Transport and Infrastructure

Officers will continue to engage with Highways England and Essex County Council during preparation of the emerging Local Plan and will undertake additional evidence base (highway studies/traffic modelling) as appropriate. The Council continues to work with Essex County Council on the roll out of high speed broadband across the District.

Creating Better Places - Community Facilities

Community facilities are things such as local shops, public houses, sports venues, places of worship and other meeting places. The Council has to plan positively for the provision of community facilities and other local services to make sure people don't have to travel too far to access the services they need. This chapter considers how facilities and services can be maintained, developed and modernised in a way that is sustainable and retained for the benefit of the community.

In general the comments received were concerned with the need to provide facilities alongside housing growth and the timing of doing so. That existing facilities are overburdened and also require investment was also a common theme and the need to consider ongoing maintenance and funding requirements, not just the initial provision. Furthermore, loneliness and meeting the needs of an aging population was also raised. A key starting point is to clearly define what a "community facility" is and a number of people/organisations suggested this should include public rights of way.

Comments in respect of schools, broadband, health facilities and shops are considered under their respective chapters

Total Number of Comments = 94

7a Issues (66) + 7b Options (28)

Summary of responses

- New Greenfield sites should be required to not only provide community halls but places of worship, public houses etc. that are critical to the health of any settlement.
- Provision of new facilities should be included within new developments to reduce trips by car and to encourage linked trips and pedestrian and cycle trips.
- In addition to the protection of existing community facilities and the provision of multi-use buildings, the new plan should have the objective of encouraging large mixed use schemes which are capable of providing a range of on-site community facilities.
- A comprehensive approach to planning through the provision of a new settlement would provide services, leisure facilities and open space for community use.
- Schools health centres, libraries etc. need to be in situ before new residents
- Proposals which include a large number of new dwellings must include a tangible plan to deliver associated facilities, accompanied by a delivery date
- Developers should contribute to the costs of additional facilities
- There is a need to be realistic in terms of what can be provided as part of new developments.
- The council needs to create the conditions where landowners see value in providing community facilities so that provision will enhance the product the landowners are developing
- We support these issues and consider that they summarise the District's challenges.
- Build high-rise apartments with extra facilities, such as gyms, spas and pools close to town centres as an alternative to living at the edge of towns or villages and recognise this form of urban development as a lifestyle choice.
- Ease parking restrictions for those in the centre of town or making it easy for them to rent multi-purpose community facilities.
- Work with owners and community groups to permit temporary or indefinite term facilities.

- The New Local Plan should recognise the links between settlements [when considering the distribution of housing] and their interconnectivity in relation to [facilities]:
- Where it may not be appropriate to provide a new centre to replace an existing one it could be appropriate to provide complimentary facilities alongside improvements to the existing centre.
- New housing development can help ensure the provision of community facilities through, the provision of new facilities within developments or proportionate contributions towards off-site provision.
- The scale of new developments is key to the provision of new facilities: lots of smaller developments will not be able to provide facilities such as [local centres].
- The benefits of mixed use schemes in the delivery and management of community facilities needs to be explored further.
- New uses need to be appropriate to specific new developments through close consultation with local communities and Parish Councils.
- Community facilities must be well-used to survive: the New Local Plan should look to direct some more growth [than in the Site Allocations Plan] to smaller settlements to ensure their local facilities remain viable.
- The Council cannot force someone to risk their own money in a commercial venture such as a village shop or pub.
- The positive benefit of new housing supporting community facilities, especially in smaller settlements, should be reflected in the Sustainability Appraisal.
- Improve use of existing facilities.
- Issue of ongoing cost of maintenance of facilities needs to be considered: If charges are increased, small community clubs & groups cannot afford to pay.
- BDC's parish support grant has been cut
- Some clubs have closed down due to lack of funding; these clubs provide social activities for all age groups and should be encouraged.
- It could be further stressed that the future delivery and management of community facilities will be reliant on a partnership between the public and private sectors.
- You cannot plan when you don't control the resources needed to deliver your desired outcomes.
- Joint cooperative working will have to be undertaken with adjoining LPAs and the County Council to discuss any community facility requirements that may emerge as the result of any potential cross-boundary strategic housing allocations. (**Colchester Borough Council**)
- The implications of community infrastructure contributions (the forthcoming CIL charging schedules of the respective authorities) should also be discussed in this regard at the relevant time. (**Colchester Borough Council**)
- Treat voluntary not-for-profit service organisations as if they were commercial service providers, and provide funds to them that will show a financial return (saving) to councils.
- Problems of loneliness and isolation, particularly in rural areas and of older people, the numbers of whom will increase during the plan period.
- Consider bussing in elderly people to more social events.
- Community halls and social spaces will need to be provided.
- Facilities and services need to be accessible by a range of transport options.
- Extend/promote community cars for residents who may be unable to afford taxis.

- Issues of capacity for existing facilities which are already overstretched; needs addressing even before demand increases.
- Ensure that local services and infra-structure are upgraded before building.
- Provision for Churches and places for community activities, to draw the neighbourhood together.
- Need to consider the place of the Church in a community is a key aspect that has to be given proper consideration.
- Churches should be used more, rural churches are mostly in the village and easily accessible.
- It is suggested that some of the District's key sports facilities such as the golf club are highlighted as well as cultural facilities, in addition to things like local shops, public houses, sports venues, and places of worship, libraries and other meeting places.
- There is nothing to do here [Witham] for teenagers or even pre-school children and you want to build more houses.
- Witham is now huge and yet we have no cinema complex, no nightclubs, etc. Entertainment in the Witham area definitely needs to be improved.
- Enabling full use of community facilities is also required. For example, clubs such as PHAB closed in Halstead because the community centre in Halstead was no longer opening in the evenings.
- Any pressure to resist the closure of local facilities, including pubs, would be welcome: Policy protection for existing community uses.
- Village shops and post offices are closing/have closed: Need a way for them to stay open/be re-established e.g. rate relief, assistance with premises.
- Support mobile facilities shares between villages/hamlets.
- Pubs/shops especially in rural areas could be taken over and run by the local community with help/guidance from the council:
- The closure of pubs and their replacement by convenience stores is an issue and may need to be addressed locally by local planning authorities.
- Support provision of multi-use buildings which can meet a wide range of community needs but must bear in mind that while multi-use facilities save resources and money, some services are not appropriate in these settings.
- Make better use of educational/school buildings/facilities in out-of-school time: These are existing public multi-use buildings which are generally under-used.
- Multi use buildings could even be used for outreach health care services: This is happening in Southend.
- Amend the definition of Community Facilities to make it clear it includes public/multiuser rights of way: They are permanently available, free to use and many sectors of society simply cannot afford to pay to use private facilities
- The protection and enhancement of Public rights of way will become increasingly important to the public as the number of vehicle movements increases and the roads become more dangerous and congested.
- We [National Theatres Trust] suggest use of the following description for community facilities that would obviate the need to provide examples: *'community and cultural facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community'*. This would include your cultural facilities that contribute to the social and cultural well-being of the local community, such as museums, pubs and music venues, libraries, cinemas and theatres.
- We [National Theatres Trust] would expect a policy to be included with the wording along the lines of: *'Existing community and cultural facilities will be safeguarded*

and sustained by resisting their loss or change of use unless replacement facilities are provided on site or within the vicinity which meets the need of the local population, or it has been clearly demonstrated that there is no longer a public need or demand for that facility.'

- Cubs and Scouts and Guides are all full to capacity [Hatfield Peverel].
- Although healthcare is not specifically identified as a 'community facility', the use of such a broad term is ambiguous. The emerging Policy should specify exactly what is meant by 'community facility' to prevent misinterpretation. **(NHS Property Services)**
- The NHS requires flexibility in its estate. In particular, the disposal of unneeded or unsuitable sites and properties for best value is an important component in funding new or improved facilities for public services within an area. Restrictive policies that prevent the loss or change of use of 'community facilities' and include healthcare facilities within this definition can prevent or delay required investment in alternative facilities and work against the Council's aim of providing essential services for the community. **(NHS Property Services)**
- Remoteness from the large towns means that residents from rural areas do not travel to use the facilities there instead using village halls and children's play areas provided in the parish.
- Many people today choose to be cremated with their ashes disposed of in a variety of ways: Many rural areas do not see the need for new cemeteries.
- Not enough thought is being put into securing new leisure areas for future generations, for example, cycle tracks.
- Compulsory purchase of land at Straits Mill, Bocking for an ecology centre which could involve local schools, colleges and universities.
- Expand the Blackwater Country Park which is the only decent sized one in Braintree.
- It is important that [greenspace] provision is made for future generations who must not be left with small urban jungles.
- Up-grade Braintree museum to include gallery space for exhibitions and possibly an auditorium for lectures and for concerts and films in the town.
- Braintree has good community facilities especially for elderly residents at the moment; these would have to be increased to accommodate more residents.

Officer Comment on Community Facilities

A Community Facilities Study is being commissioned to identify the existing community halls and other multi-use facilities in the district; assess the capacity, condition of and scope for expansion of the facilities; identify the need for new community facilities in proposed new developments; and identify which existing facilities could benefit from S106 investment from developers to expand their operations, and where new build facilities may be required. Consultations with key stakeholders in this area will continue.

Creating Better Places - Creating high quality spaces

This Issues and Scoping chapter outlines the challenges which the district will face in balancing the requirement for new homes and jobs with the desire to protect the historic environment, landscapes, and the creation of high quality environments.

The National Planning Policy Framework (NPPF) encourages both a significant increase in development alongside the conservation and enjoyment of the historic environment. Good design, it states, is indistinguishable from good planning.

A broad range of issues and options were listed in the document which include protection of the districts historic character, the promotion of good design, the option for policies on density and size.

For question 8a a total of 67 comments were made, five of which were from statutory consultees and parish councils.

For question 8b 39 comments were made, 4 of which were from statutory consultees and parish councils.

Responses to question 8a

- Impact of housing on the historic environment and landscapes;
- Should not be creating high quality spaces as it's the existing countryside and inner town parks that attract people and should be protected;
- Protection of animals, plants, and trees from developments;
- Support the creation of high quality spaces, but we should not be prescriptive as it could frustrate innovation;
- Please consider the effects of development on the environment and the need for conservation of local areas;
- The integrity of villages needs to be protected;
- Need to prevent the loss of heritage and the minimise the impact of development on the historic countryside and villages;
- Sufficient parking needs to be provided for new developments;
- Development should be accessible to all forms of transport;
- Development should have sufficient space and road access;
- Development should not needlessly change the very nature of peaceful, beautiful rural areas;
- Large scale development should not damage heritage assets;
- Development should not be bolted onto historic villages;
- Planning policy is the cause of poor quality design and is not the solution;
- Heritage should be preserved and development of greenfield land around settlements will have an impact;
- Protection of greenspaces in towns is important;
- Parking standards should be flexible and lower in areas with high public transport accessibility;
- Protection of existing space from development;
- Housing should have community facilities;
- The plan should not be proscriptive over densities;
- Include issue on protecting vulnerable road users;
- Include issue "How can we protect and enhance the public rights of way network to create more leisure and recreation opportunities";
- High quality spaces should not be a tick box exercise but should represent each locality;
- Additional issue "Provision of adequate living spaces";
- Large developments will destroy valuable historic assets and remains;
- Refuse development which affect ancient monuments, listed buildings, prevent the alteration of development boundaries;
- Design policies should not be over proscriptive;
- BDC needs to be open minded about design and should actively encourage innovative design which can help create town character and a sense of place;

- Suitably robust mechanism to protect Essex landscapes required;
- Protection of greenspaces within urban areas;

Responses to question 8b

- Protect the countryside and wildlife which lives there;
- Permeable paving and sufficient parking spaces are needed;
- Generous green space should be provided in any development;
- Policies should not stifle design;
- Strong policy protection for the historic environment, together targeting development in the right place and making it of the highest quality.
- Site owners should be encouraged to improve the local environment;
- Local list supported;
- Local list not supported;
- No policy restrictions on density;
- No restrictions on the free market approach;
- Rights of way should be included in new developments;
- Standards for design and density need to be flexible to ensure that residential development remain appropriate over the plan period;
- Development should take place in less historically sensitive locations;
- Expansion of local nature reserves;
- Provision of safe play areas for children;
- Bridalways should be incorporated into new developments;
- Existing wildlife spaces should be safeguarded;
- Development should contribute toward community facilities and the provision and upkeep of new rights of way;
- Set policies for minimum room sizes;
- Protection of historic and archaeological character is important and development needs to be carefully designed to ensure that it is sensitive to and compliments important areas such as conservation areas;
- Design guidance and master plans will be appropriate for some sites and should take place during the planning application process;
- Development should not simply be a mirror of nearby development style;
- Flexibility is needed over the life time of the plan when setting size, type and tenure of homes;
- Agreement with options stated;
- Adequate storage provision must be provided and space to enable people to live their lives;
- Modern development does not contribute to the character of existing buildings due to both design and modern materials;
- No development in sensitive areas;
- New ideas not always better;
- Flexible policy approach should be used with large scale development which will take place over the life of the plan;
- Encourage development on brownfield sites first and prevent urban sprawl;
- Liaison with local groups is a priority;

Statutory consultee comments

Feering Parish Council, Historic England, Essex County Council, Colchester Borough Council, Sturmer Parish Council, Feering Parish Councils,

- Issue “How do we ensure development on brownfield first?”
- Issues “Mix of housing sizes and densities required”;
- Issue “Need to protect village envelopes and green wedges to mitigate against urban sprawl”;
- The historic environment is not just a design issue;
- a balance in meeting the needs of all in the District and recognition of what might be destroyed through that provision;
- Should cross-boundary sites be allocated, any policy content, master-planning and design requirements regarding these sites should be the product of joint working between the two LPAs;
- New housing and developments should have the local vernacular style;
- Policy on house size and housing density needed, and should be able to change depending on circumstances;
- We welcome a number of the options, including protecting and enhancing the District’s historic and archaeological character, the promotion of a Local List, and the promotion of good design and design guidance.

Officer Comment on High Quality Spaces

The Council is continuing to produce evidence base which will help determine the most appropriate strategy for housing growth in the district. As part of the site allocations process the environmental impacts of sites would be thoroughly assessed both through the assessment of site submissions by officers and through the SA/SEA process. Further evidence on Landscape Character will also assist the process of site selection where greenfield allocations are necessary, and the Strategic Housing Land Available Assessment will enable the Council to identify brownfield sites for development.

Creating Better Places - A Healthy and Active District

A key role of the Local Plan is to provide for development in a way that supports and encourages active and healthy lifestyles. Statistics have indicated higher than national average levels of obesity amongst adults in the Braintree District and lower than average participation in physical activity (Essex Local Authority Portraits September 2014). There is also an ageing population with the proportion of residents aged over 65 being higher than the national average. The needs of ageing population need to be met through provision of accessible and appropriate housing, access to health care, facilities and public transport. The District is predominately rural therefore providing opportunities for recreational access to the countryside and off road cycle routes and public rights of way is important. However, limited public transport services in parts of the rural District can reduce access to health, leisure and recreational facilities.

We have received 154 representations to this chapter. 35% of the comments were relating to call for site submissions at West Tey, Andrewsfield, Bocking, Coggeshall, Feering and Kelvedon, Hatfield Peverel, Rayne and Silver End.

Doctors/Hospitals

- Difficult to get appointments at doctors.
- Hospitals, Doctors Surgeries, Social Services, strained to their limits. Access for emergency vehicles needs to be considered when layout of developments planned/decided.
- Colchester hospital A&E recently had to close as it couldn't cope. Colchester hospital is under scrutiny.
- Broomfield hospital is overwhelmed.
- Approach necessary professionals (doctors, teachers, and dentists) during their qualification period with a modest financial package if they agree to come to our district once qualified.
- Not enough doctors and dentists.
- Plans for a new "super surgery" in the town on the current bus station site, will only help to alleviate the situation with the present population.
- Necessary upgrading of infrastructure should be a precondition for all development in this area: health.
- The North East Essex Clinical Commissioning Group has recently revealed that Essex has one of the lowest concentrations of GPs per resident in England.
- New housing development can help ensure the provision of community facilities. There are not enough amenities in terms of shops, schools locally and hospitals.
- Increase in population would put an extra strain on already overstretched health and school system.
- Does it imply taxing developers to pay for new health facilities to provide for the needs of the 14,000 people who already live in the district but do not have adequate homes? If so this is not acceptable.
- Work with health and Social Care services, third sector organisations and local people to identify needs and improve services.

Fast food outlets

- The council can only try and offer healthy choices. It cannot make people behave healthily.
- Too many fast food outlets contributor to poor diet as well as creating litter problems.
- There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A Class premises.
- With a policy restricting location in place, all A5 development would likely be directed away from major, district and local centres contrary to the sequential test.
- Review the density of hospitality/catering operations in proportion to other businesses operating.

Open Space/Green Space

- The open spaces that would need to be used to accommodate all of the extra housing would be a serious loss of amenity
- Large green spaces need to be retained in order to give everyone a better quality of life, not just little postage-stamp-size areas of green within the development.
- The council makes a commitment to protect existing open space. However it does not provide evidence of the actual benefit of such space to the local community.
- Inconsistent to suggest that rural space offers opportunity for recreation when the Council committed to spend £5M to develop an indoor recreation facility
- People do not use rural space for recreation and leisure preferring to go the shopping facilities and use indoor cinemas.

- Include open spaces for people to have leisure time; important for health and wellbeing.
- Has anyone put land forward in the call for sites to be used for allotments? If not the council is being disingenuous to suggest it.
- Section 106 Agreements associated with new development could include the provision of community gymnasias possibly associated with Open Space or Sports and Recreation facilities to promote healthier lifestyles for existing and future residents.
- Braintree has an Athletics Club. Acting in unison with schools the Council should encourage more young people to join.
- Incorporate Community Orchards, Gardens and Allotments into the layout of new neighbourhoods and to promote the communal management of such facilities.
- Opportunity should be taken to look to developers to contribute towards enhancing existing facilities, when they are within walking distance.

Ageing Population

- Health and activity needs and demands of an ageing population.
- Policies being considered appear to be a continuation of existing policies rather than a new approach to deal with an ageing population.
- Need for specialist homes and those that can be adapted to facilitate people living independently for longer. This section should also recognise that the provision of sheltered housing in the form of new development is a very important contributor to the aim of allowing elderly people to live independently, but in close vicinity to suitable care and support facilities.
- Meeting the needs of the ageing population through the provision of accessible and appropriate housing should be put into effect by the inclusion of policies in the Local Plan which have the effect of welcoming such new development.
- Tackling loneliness - especially among older people by improving access to services especially for those unable to mobilise independently.
- Emerging policies should quantify the level / percentage of dwellings required to integrate specialist standards, i.e. lifetime homes.

Cycling/Walking

- Pavements are not wide enough for families to use.
- Cuts in the maintenance of the existing network of public rights of ways and cycleways.
- Safety concerns of cycling and walking particularly in rural areas.
- Maintaining, upgrading and increasing footpaths and cycleways would be helpful.
- Lack of a joined-up approach between the NHS and local councils in promoting / providing health walks / healthy walking. Some of the healthy walking / keep active budget should be used to keep the assets that we have "the public rights of way network "in a good and usable condition.
- **Essex Bridleway Association** - We agree with the option to 'create developments that are accessible for everyone including those with limited mobility' and would ask that it is made clear that 'everyone ' includes horse riders.

Site Specific

- The site at Crunch Croft in Sturmer presents an opportunity to provide bungalow accommodation
- Straits Mill within the boundaries of Convent Lane, Broad Road and the A131 should be maintained for community recreation
- Crown Estate's land at Kelvedon/Feering offers significant opportunities to open up areas of land specifically for the local community for uses such as a community woodland or river park.

- Dorewards Hall on the edge of Braintree could provide various facilities

Other

- 1 in 4 houses should have a back garden of sufficient size to permit vegetable growing.
- Meeting the needs and demands of a young population
- Many of options will not be appropriate for a small rural settlement with few facilities.

Statutory Consultees – Summary of representations

- **Essex County Council (ECC)** - ECC adopted the Outcomes Framework for Essex - a statement of seven outcomes that set out ECC's ambition based on its Vision for Essex 2013-17. The outcomes that are specifically relevant to this Local Plan consultation include, 'People in Essex enjoy good health and wellbeing'. The outcomes reflect ECC aspirations for Essex residents and communities, guiding action in the short, medium and long term hence the importance of ensuring the outcomes inform emerging spatial policy'.
- **Sport England** - Sport England believes that the draft 'The Braintree Local Plan' should contain within its vision and objectives the ability to maximise the opportunities for and the benefits of sport in the community and to integrate future developments with the existing community.
- **NHS Property Services** would support the Council's proposed approach to working with the NHS to ensure that there are sufficient healthcare facilities to support housing growth.
- **Rivenhall Parish Council** - Currently there is a totally inadequate infrastructure provision within the areas of Witham and Rivenhall, need for major expenditure for the provision of additional improved medical facilities which the area already lacks.
- **Feering Parish Council – Public rights of way should be maintained.** There is lack of casual kick-about spaces near homes. Unless there is a proven need for allotments, this should not be a specific requirement. Encourage the development of age appropriate housing which are higher density and so could perhaps be fitted into areas near shops, transport, community facilities.
- **Witham Town Council** – Need for provision of easily accessible health facilities locally.
- **Rayne Parish Council** - We are fortunate in Rayne with the Flitch Way and other footpaths close by. These have to be protected from unwanted adverse impact from dust and the like that come from significant developments.
- **Coggeshall Parish Council** - Feel the issues with the infrastructure should be give greater prominence within the document.
- **Stebbing Parish Council** - A large new settlement of a Garden Village would be isolated and away from an urban centre and there would be insufficient population to sustain many of the community facilities promised.
- **Sturmer Parish Council** - Range of options may address the issues raised but many of them will not be appropriate for a small rural settlement with few facilities. However, the rural environment can offer opportunities for enjoying the open countryside, fresh air, growing fruit and vegetables, keeping animals and country pursuits.

Officer Comment on A Healthy and Active District

Officers have appointed consultants to update and produce an 'Open Spaces, Sports, Recreation Strategy.' This will analyse accessibility, the needs and demands for facilities in the District, standards for new provision and will form part of our evidence base underpinning the Local Plan policies. Officers will engage with statutory consultees including Essex County Council, NHS and Sport England to ensure that policies in the emerging Local Plan meet wider needs and aspirations.

Protecting the Environment - Climate Change

The 'Protecting the Environment' chapter seeks to address the aim in the NPPF that; "*Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations*". It highlighted issues to be addressed and possible options to address these issues.

78 representations were received in response to this chapter, though 16 were site representations and not included here. Three responses were received from Statutory Consultees namely Essex County Council, Anglian Water and Historic England. 7 came from Parish Councils. Representations were also received from the public, local interest groups and the development industry.

The following is a bullet point summary of the responses grouped into broad categories.

Energy Efficiency

- Support sustainable construction and renewable energy measures
- Encourage energy-efficient, climate change resilient homes rather than large stand-alone renewables schemes.
- Renewable energy should be mandatory on new build
- Preventing energy waste is the most cost effective way to reduce emissions
- Conservation Officers need to recognise that reducing energy costs is more important than preventing change
- Energy efficient measures benefit the historic environment by allowing old buildings to be used/maintained
- Orientate buildings to take advantage of passive solar warming and PV electricity generation
- Minimise new lighting and ensuring it is low energy.
- In conversion of an existing building, sustainable design standards should be used and thought given to retrofitting of energy efficiency measures.
- Development viability to be considered in relation to energy efficiency objectives
- High energy efficiency standards could increase house prices
- Energy efficiency policies should not be prescriptive
- BREEM standard is appropriate for assessing energy efficiency of non-residential buildings
- Energy efficient measures are a building regulations issue and inclusion within a planning document is inappropriate.
- Reference should specifically be made to the consolidation of the Code for Sustainable Homes into Building Regulations, as part of the Housing Standards Review.

- The plan should reflect Government's decisions in the July 2014 "Allowable Solutions" report
- Rapid change in energy technologies will require policy to be framed later in the plan process.
- Policies should therefore be flexibly worded to allow the most appropriate solution for each location

Renewable Energy

- Support renewable energy measures and reduction in carbon emissions.
- Renewable energy schemes should be developed ONLY on brownfield sites and NOT on best & most versatile agricultural land
- No on-shore wind turbines
- Encourage public sector and commercial premises to invest in on-site neighbour-friendly renewable energy schemes / recycling of produced heat
- Small/medium scale electrical/heat production should include burning non-recyclable waste
- Renewable energy (solar panels, groundsource heating etc.) and other green measures (e.g. sustainable materials, grey water systems) should be required on all scales of development
- Decentralised energy/renewable energy is more expensive in engineering terms leading to escalating energy costs
- Renewables schemes should be capable of providing energy over an entire 24-hour 12 month period
- Concerned that wording "Facilitate and encourage large scale renewable schemes", without any qualification
- No harm in facilitating renewable energy but the council opposes such proposals
- Renewable energy generation must be weighed against its adverse impacts - which vary per type of scheme
- Encourage developers to use new technologies by using incentives not legislation.
- All types of energy generation and fossil fuel generation are acceptable

Flooding

- No new development in the floodplain
- Large sites with some land in Zone 2/3 can be developed if it is used for e.g. open space.
- Local Plan should show a flood alleviation plan for areas of the District prone to flooding.
- New developments should not contribute to flooding problems
- The plan should recognise that climate change, e.g. the water table is higher and those without main drainage are struggling
- Flooding should be mentioned in the issues section
- Emphasise the need for rivers to be properly maintained
- Flooding is not as much of an issue in this rural district as in city areas

Sustainable Urban Design Schemes (SUDs)

- The use of SUDs is supported
- Should not take a prescriptive approach in requiring specific types of SUDs
- Little information on SUDs in this document.
- Local planning authorities or developers should be obliged to pass SUDs information to the register of drainage assets for monitoring and enforcement

- Most undeveloped land is for farming and uses drainage techniques to pass water to the nearest watercourses. SUDs by comparison would make a small contribution to flooding. The benefits do not justify the costs.
- Encourage the multiple use of land used for SUDs where practicable
- No buildings or impermeable surfaces adjacent to rivers or watercourses.
- Scale of development around Coggeshall will cause surface water drainage issues and SUDs are difficult to provide for large scale growth.

Water Supply and Efficiency

- Support water efficiency measures
- Grey water recycling has faced market resistance from new purchasers
- A broader water management plan is needed.
- The water supply west of Braintree is known to be over extracted and areas of Stebbing have water/drainage problems.
- Large growth in this dry climate will cause drastic reduction in water table/reservoirs

Other Comments

- Building on agricultural land harms food production, increasing need for food imports
- Opportunities to provide on-site community composting schemes on developments
- Encourage residents to grow their own food (reducing food miles) by requiring new developments to include allotment provision and by protecting existing allotment sites.
- The draft plan cannot secure radical greenhouse gas reductions as its standards apply to new development only and its contribution is tiny compared with the world wide emissions
- The scale of development proposed together with associated traffic would increase carbon emissions and pollution.
- Local incinerator would reduce the transportation of waste out of the area
- Insisting on carbon offsetting measures harms local economic performance
- New infrastructure should support clean energy usage.
- The ability to run the clean energy vehicles that charge from the home is important.
- Support the range of options put forward to address the issues
- Develop and maintain old rundown existing properties rather than renewing them

Comments from Statutory Consultees

Anglian Water

- Policy should ensure that development proposals include evidence of having followed the surface water management hierarchy
- Support close working between Lead Flooding Authority, drainage authorities and planners to achieve SUDs.
- Make reference to the Essex Surface Water Management Plan and Flood Risk Assessments.
- The same design standards be applied to both new and existing built development.
- Development designs should follow and protect existing natural flow pathways
- Stress the importance of early developer engagement in surface water management design
- Consider Anglian Water encroachment policy in making site allocations.
- The Water Cycle Study - (Jan 2011) needs review. Anglian Water's Water Cycle Study Gap Analysis can be provided to assist the Council.

Historic England

- Include wording that energy efficiency measures should not harm impacts on character, appearance and setting of all historic asset types not just Listed Buildings/Conservation Areas.
- Expand existing wording to state that the significance of the heritage asset should be conserved. This would cover all scales of development.

Essex County Council

- Consider designing new development to have potential to be connected to a decentralised energy (heating) system,
- Seek provision of sustainable drainage systems (SUDS) for all scales of development.
- A Surface Water Management Plan, (which identifies Critical Drainage Areas), will soon be commissioned for Braintree and Witham. This will identify areas at risk of flooding and where SUDS can reduce flood impact.
- ECC recommends a policy for surface water drainage and supporting text to be included in the new Plan which was included in the draft SADMP as Policy ADM57A

Officer Comment on Climate Change and Renewable Energy

The Council is currently working with partners to produce both a Strategic Flood Risk Assessment and a revised Water Cycle Study. This is alongside the Critical Drainage Area review of Braintree and Witham which is already underway and will be working closely with Essex County Council in its role as Lead Local Flood Authority.

Renewable energy and energy efficiency policies will be framed in relation to the latest government guidance and technological advancements.

Protecting the Environment - Nature conservation and Landscape Character

Braintree District is predominately rural with distinctive and attractive landscapes. A careful balance needs to be achieved between development, use of the countryside as a recreational resource and the protection and enhancement of the natural environment. Landscape Character Assessment is a technique that has been developed for the analysis, description and classification of the landscape. It pin points what makes these areas different from neighbouring areas and makes appropriate recommendations for future conservation and management of the landscape. The upper Stour Valley, adjoining the Dedham Vale Area of Outstanding Natural Beauty (AONB) is partly located along the north and east boundary of Braintree District and is an important and sensitive rural landscape. Development in this area should be carefully assessed in light of the sensitivity. The landscape in the Braintree District includes four protected areas for their Special Scientific Interest (SSSIs) as well as seven local nature reserves, local wildlife sites, eight registered parks and gardens.

We have received 140 representations to this chapter. 42% of the comments received were relating to the call for site submissions at Andrewsfield, Witham, Black Notley, Bocking, Halstead, Rayne, Silver End, Stebbing, Stour Valley, Sturmer, West Tey.

Loss of countryside

- Must consider the impact of food production following the loss of farmland to housebuilding.
- Nature of the existing rural settlements will be affected and they will lose their village character.

- Concern about loss of countryside and a 'concrete jungle'.
- There is no goal of protecting the countryside and preventing urban sprawl. Protect the countryside to prevent urban sprawl. Braintree must continue to develop brownfield sites.
- The District is predominantly rural and all that that designation entails needs to be proudly protected and promoted by the Councillors.
- Priority must be given to every brown-field site before green-field sites.
- Not protecting countryside for its own sake.
- High density housing must be given priority as a key solution to reducing the destruction of green-field land.

Wildlife

- The effect on wildlife is also important.
- Natural habitat is a serious consideration when removing hedgerows, concreting field boundaries and the impact on the natural water table.

Site Specific

- Andrewsfield New Settlement Consortium between Rayne and Great Sailing is high quality agricultural land and should be left as such for much needed UK food production. Environmental impact would be huge. Valuable farmland birds, butterflies and wild flowers which are already under threat nationally. Would envelope areas of outstanding natural beauty as well as LoWSs.
- Bellfields, Witham is area which is a local haven for wildlife. Brain Valley, Black Notley is a protected area.
- London Road to Bakers Lane and Witham Road is good agricultural land with many mature huge trees oak and other species, the area is covered with natural ponds and streams and a haven for wildlife.
- Straits Mill Bocking is an area of outstanding natural beauty. The countryside is being eroded, wild life affected. This is, arguably, the last "wild" ~~in the District~~ ^{in the District} and a haven for wildlife.
- Broad Road, Bocking, please don't push the countryside away from us. Soon the younger generation won't be able to see rabbits, hares, hedgehogs, squirrels, foxes and many birds in the wild already they are dwindling in numbers green spaces are good for soul.
- Coggeshall, any suggestions for housing will destroy the buffer space of open countryside maintained between existing development and the bypass.
- Cressing, development would remove forever fertile agricultural land needed for sustainable food production and render this country even more dependent on imported food.
- **Braintree & Bocking Civic Society** - concern about erosion of the countryside and the potential for urban sprawl to link Braintree (and any town) to its surrounding villages. Flitch Way would be transformed from a pleasant rural amenity area into a footpath between houses. Some of the fields which would be lost are valuable informal open spaces.
- Marks Tey/West Tey, wildlife and rare breeds that reside in this unspoilt stretch of countryside. Green belt land should remain sacrosanct.
- Halstead, protecting the natural environment is important. The Sloe Hill site is currently identified as a Local Wildlife Site.
- Silver End, no need to spoil countryside we live around. Village with history and beautiful landscapes.

Statutory Consultees – Summary of representations

Essex Wildlife Trust - The issues that impact upon nature conservation should include the following: Protecting and enhancing designated and priority habitats across the district, Protecting and enhancing priority species populations across the district, Protecting and enhancing ecological networks across the district, Identifying and monitoring suitable biodiversity indicators based on up to date evidence. Legislation and Policy Local authorities in England and Wales have a legal duty to conserve biodiversity. □

Essex County Council - ECC supports the identification of the need to provide measures to protect and enhance local biodiversity with suitable mitigation. The recommended policies seek to improve consistency with national biodiversity conservation policy and best practice.

Black Notley Parish Council - objects to any further development amendments to the village envelope. Such developments could lead to the village disappearing into the suburbs of Braintree with this urbanisation leading to a loss of countryside, open space village life and good agricultural land.

Feering Parish Council – How to encourage the development of (potentially) contaminated sites so that these sites can be brought back into use rather than remaining un-productive eyesores. Protection of village envelopes / green wedges / green belt to mitigate against urban sprawl. The objective that new developments should draw inspiration from its landscape setting is supported, as is the protection and enhancement of local biodiversity. The plan should favour proposals that can successfully decontaminate land and enhance damaged landscapes.

Rayne Parish Council – Impact of the proposed sites that have been offered for consideration in the Local Plan and will require Environmental Impact Assessments along with detailed Sustainability Assessments that should be presented for consultation

Stebbing Parish Council - Loss of prime agricultural land of excellent quality at least 3A to 1A. Ancient Woodland Boxted Wood is situated in GRSA270 and is ancient woodland of significant wildlife value. Stebbing Green is a Local Wildlife Site (LoWSs). Serious environmental damage to the flora and fauna.

Officer Comment on Nature Conservation and Landscape Character

Officers have appointed consultants to update the Landscape Character Assessment and evaluate the Landscape Capacity Analysis (2007) providing a finer grain assessment for the capacity of land to accommodate development on the periphery of the 8 key settlements. (There is a separate Committee report relating to this matter on the agenda for this meeting). This work will help to determine the most appropriate directions for future residential and employment growth in the District by providing an up to date evidence base for the new Local Plan and will underpin policies in Local Plan relating to Landscape Character Areas, biodiversity and environment. Officers will engage with statutory consultees including Essex County Council, Essex Wildlife Trust to ensure that policies in the emerging Local Plan meet wider needs and aspirations.

Evidence Base and Glossary of Terms

In order to support the new Local Plan, a strong evidence base of documents must be produced. As set out in paragraph 158 of the National Planning Practice Guidance;

'Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals'.

The comments indicated that the evidence base is generally considered to be sufficient subject to some suggested additions. That the evidence should be updated as necessary and should not be viewed as an exhaustive list was also highlighted.

Total Number of Comments = 43

- Need to consider education impact/capacity
- Infrastructure Plan also to cover Public Transport/Highways, capacity/road improvements/education
- In addition to the Highways Impact Assessment document, I would suggest that a similar Public Transportation Impact Assessment study is required.
- Update the Retail Study (previous update 2012 – last full assessment 2010)
- Need to consider Health Impact Assessment/evidence
- We consider that the scope of the evidence assembled and referred to in the Issues and Scoping document is too internally focused.
- Need a tourist/tourism assessment and strategy
- No consideration has been given to bridleways
- Add to the evidence base: Definitive Maps of Public Rights of Way; ECC Development and Public Rights of Way – Advice note for developers and development management officer; ECC ROWIP (Rights of Way Improvement Plan); ECC Guidance documents e.g. Transport Strategy, Cycling Strategy, Development Management Policies; Central Government Guidance & Policies e.g. NPPF, Natural England, DfT (Department for Transport) Design Manual for Road and Bridges, volume 6 and Cycle Infrastructure Design, 2008
- Produce a Survey of actual housing needs of Braintree people and how they can best be met within the Local Plan
- The list of documents appears to cover the key evidence base requirements: List is sufficient: Schedule appears comprehensive from a technical perspective.
- It [evidence list] should not be considered as exhaustive, and should be reviewed as the Local Plan progresses.
- The demographic projections and objectively assessed housing need assessment will need to be updated to take into account the recently published 2012 household projections.
- It is important that the settlement boundary analysis work is up to date and also that it is undertaken in the context of the housing growth requirements for the District
- Will all of the above evidence base be overviewed and updated to present day, with all new proposals being viewed as of present day and not by outdated data?
- The evidence base in the last round of LDF was not to current standard which put a totally incorrect view on developments being considered.
- Reference should also be made to the Historic Towns Assessment (1999) (**Essex County Council Spatial Planning**)
- In relation to Highways, evidence of accidents and injuries should be considered along a stretch of road adjacent to which a development is proposed.
- We do not agree the evidence base is sound. It appears little consideration has been given to the need to enhance public rights of way, as required under the terms of section 75 of the NPPF.
- We welcome the reference to the Historic Characterisation Study, which was produced by Essex County Council.
- In line with Paragraph 169 of the NPPF, the Local Plan should be based on up to date evidence on the historic environment. The characterisation study may need to be reviewed and updated, but most importantly, it should be used to inform the

emerging Local Plan. Other historic environment evidence sources should be audited and reviewed, to update and/or produce new documents (**Historic England**)

- In order to inform the rural settlement hierarchy, it will be important that the Council undertakes a Rural Settlement Study.
- Conservation Area Character Appraisals should be included.
- There should also be an assessment of all designated heritage assets. The significance and setting of the districts heritage needs to be fully understood to form part of the evidence base. There are a number of Conservation Areas of exceptional importance and the statutory duty to review and enhance is not being fulfilled.
- Include Lambert Smith Hampton's 2012 report, *Viability Review of Employment Sites in Braintree District*
- Include a document stating how the District Council is saving money by using Solar Energy etc. The type of vehicles issued to staff etc. would set a good environmental example. This would set a standard for others to follow.
- If all the items listed are statutory requirements then that's fine.

Glossary

- (Essex County Council Spatial Planning) Recommend a number of new terms are new Local Plan

Miscellaneous Other

- The Plan period should be clarified in the next version of the Plan. We assume 2017-2033
- The document lacks drive and focus as it does not explain how big a change the levels of growth will be
- Face to face consultation events with planning officers would be helpful

Officer Comment on Evidence Base and Glossary

A number of evidence base studies are already underway. Officers will continue to engage with partners during preparation of the emerging Local Plan and produce or commission other specific evidence to deal with a particular issue or site as required, as we move through the Plan process.

Proposed criteria for reviewing Development Boundaries		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 Practise Guidance (NPPG) - Core Strategy 2011 - Pre Submission Site Allocations and Development Management Plan - Local Plan Review 2005 		Public: Yes
Options: To approve the proposed methodology and criteria for reviewing Development Boundaries in relation to the preparation of the emerging Local Plan. To not approve the proposed methodology and criteria for reviewing Development Boundaries in relation to the preparation of the emerging Local Plan.		Key Decision: No
Executive Summary: Development boundaries are reviewed periodically to assist in meeting housing targets and to ensure features that define the development boundary have not changed and remain current and relevant. There are currently 66 defined development boundaries in the District. Reviewing the development boundaries as part of the new Local Plan process will ensure that development is focused in those settlements that are most sustainable and provide local services/facilities to meet day to day needs. The report proposes a methodology and a series of criteria that will be used in the reviewing of the development boundaries for the settlements.		
Decision: It is recommended that the proposed methodology and criteria for reviewing Development Boundaries in relation to the preparation of the emerging Local Plan is approved.		
Purpose of Decision: To agree the proposed methodology and criteria for reviewing Development Boundaries to be used in the preparation of 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 base budget.
Legal:	To comply with Governments legislation and guidance
Safeguarding:	None
Equalities/Diversity	Proposed development and protection of the environment have an impact upon equality/diversity.
Customer Impact:	Public consultation will be carried out during various stages of the preparation for the emerging Local Plan.
Environment and Climate Change:	Policies in the emerging Local Plan will need to have regard to the environment and climate change issues.
Consultation/Community Engagement:	Public consultation will be carried out during various stages of the preparation for the emerging Local Plan.
Risks:	The Local Plan could be found unsound. Risk of High Court challenge.
Officer Contact:	Juliet Kirkaldy
Designation:	Senior Policy Planner
Ext. No.	2558
E-mail:	juliet.kirkaldy@braintree.gov.uk

1. Introduction.

1.1 This report proposes a methodology and a series of criteria that will be used in reviewing the development boundaries for the settlements in the District for the emerging Local Plan.

1.2 The development boundary is a black line that is drawn on a plan around a settlement. There are 66 defined development boundaries in the District, although there are a number of smaller settlements (hamlets) which do not have development boundaries and are therefore considered to be in the countryside

1.3 Development boundaries have been used for a considerable time and are recognised as a policy tool which defines the coherent and established built up areas which seek to conserve the character of the open countryside. They prevent unnecessary urban sprawl and the loss of Greenfield sites in the open landscape of the District, and provide a quality built environment/open landscape interface.

1.4 Development boundaries are reviewed periodically to assist in meeting housing targets and to ensure features that define the development boundary have not changed and remain current and relevant.

1.5 Reviewing the development boundaries as part of the new Local Plan will ensure that development is focused in those settlements that are the most sustainable and provide local services/facilities to meet day to day needs. It will ensure that the vitality and viability of the rural areas can be supported however there is also a balance to be achieved in protecting the local landscape and character of the settlements.

2. Policy Context

2.1 Since the development boundaries were drawn up for the settlements in the Braintree District (1995 Local Plan), overall national policy context has changed

significantly. Therefore, in reviewing the development boundaries it is important to consider what the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) says in defining development boundaries.

2.2 The NPPF states in paragraph 157, *'indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;*

- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;*
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;*
- identify land where development would be inappropriate, for instance because of its environmental or historic significance'. Paragraph 21, 'set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period'.*

2.3 The NPPG states in 'Preparing the Local Plan' paragraph 2, *'The Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered. This can be done by setting out broad locations and specific allocations of land for different purposes; through designations showing areas where particular opportunities or considerations apply (such as protected habitats); and through criteria-based policies to be taken into account when considering development. A policies map must illustrate geographically the application of policies in a development plan. The policies map may be supported by such other information as the Local Planning Authority sees fit to best explain the spatial application of development plan policies.*

2.4 Although national policy does not give a detailed steer on definition of development boundaries there certainly appears to be policy support in general terms for identifying clear boundary lines. Based on this it is important to identify a clear, robust and pragmatic methodology and criteria to review and define development boundaries.

3. Criteria for defining Development Boundaries

The criteria for defining development boundaries is set out below;

- In most cases the development boundaries should follow clearly defined physical features such as walls, fences, hedgerows, roads and streams. However, some development boundaries may follow along the rear of built development rather than physical features to prevent inappropriate backland development, for instances where dwellings have large back gardens.
- The curtilages of dwellings are included unless functionally separate to the dwelling on where the land has capacity to significantly extend the built form of the settlement.
- Clusters of less than 10 dwellings will be excluded from having a development boundary and will be defined as a 'hamlet'.
- Isolated and sporadic development which is clearly detached from the main built up area should be excluded from the boundary. Freestanding/individual dwellings in the open landscape should also be excluded.

- Proposed Local Plan allocations are included, unless 100% affordable housing is proposed.
- Individual plots, small scale development sites that would provide rounding off opportunities in areas physically and visually related to the settlement are included.
- Peripheral undeveloped areas that are in defined flood risk areas should not be included within development boundaries.
- The majority of defined development boundaries include at least one community facility i.e. church/community hall/shop/public house etc. These facilities often contribute to the economic and or social life of the settlement.
- Listed buildings with important landscape settings on the edge of the built up area should be excluded.
- Farmsteads and other agricultural buildings, including those on the edge of the built up area should be excluded.
- Developments of an open character, including sports fields, tourism parks, covered reservoirs, horse related developments etc. that are outside the built up area are excluded.
- Existing employment sites if physically related to the settlement should be included.
- Existing retail sites if physically related to the settlement should be included.

4. Next Steps

4.1 It is proposed to use the proposed criteria identified above in reviewing the development boundaries during preparation of the emerging Local Plan.

Recommendation

It is recommended that the proposed methodology and criteria for reviewing Development Boundaries in relation to the preparation of the emerging Local Plan is approved.

Local Plan Sub-Committee
11th June 2015



Essex County Council: Sustainable Drainage Systems Design Guide (Dec2014)		Agenda No: 7
Corporate Priority: Securing appropriate infrastructure and housing growth Portfolio: Planning and Housing Report Presented by: Emma Goodings Report prepared by: Julie O'Hara		
Background Papers: <ul style="list-style-type: none"> Braintree District Local Plan Review 2005 The Core Strategy 2011. The Essex County Council: Sustainable Drainage Systems Design Guide (Dec2014) http://www.essex.gov.uk/Environment%20Planning/Environmental-Issues/local-environment/flooding/View-It/Pages/Sustainable-drainage-systems.aspx National Planning Policy Framework Written Ministerial Statement in the House of Commons on 18 December 2014 (HCWS161) National Planning Policy Guidance 23 March 2015 Supplementary Planning Guidance: Open Space Braintree District Flood Risk Strategy 		Public Report: Yes
Options: To approve/not approve the Sustainable Drainage Systems Design Guide (Dec 2014) as a material consideration/ part of the evidence base/ in whole or in part for the purposes of developing the Local Plan.		Key Decision: No
Executive Summary: Essex County Council as the Lead Local Flood Authority (LLFA) has produced a Sustainable Drainage Systems Design Guide (Dec 2014) which it seeks to guide development throughout Essex. Officers are recommending that the document be approved by this Council as guidance in the consideration of major planning applications. The document should be weighed against the existing Braintree District Local Plan Review, Central Government advice and the emerging plan as it increases in weight.		
Decision: The Sustainable Drainage Systems Design Guide (Dec 2014: Essex County Council) be approved as planning guidance.		

Purpose of Decision:	
To update members on the Sustainable Drainage Systems Design Guide (Dec 2014: Essex County Council) and seek authority for its use as a material consideration in the determination of planning applications and development of policy within the emerging local plan as part of the evidence base.	
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 base 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:	Julie O'Hara
Designation:	Senior Policy Planner
Ext. No.	2559
E-mail:	juloh@braintree.gov.uk

1. Background

1.1 The Secretary of State for Communities and Local Government laid a Written Ministerial Statement in the House of Commons on 18 December 2014 setting out changes to planning that will apply to major development from 6 April 2015. Sustainable Drainage Systems were to be considered as a material planning consideration in the determination of major planning applications (It does not apply to minor development). In considering such planning applications, local planning authorities should consult the relevant Lead Local Flood Authority (LLFA) on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development.

1.2 Since 6 April 2015 local planning policies and decisions on planning applications relating to major development have been required to ensure that sustainable

drainage systems (SuDS) are used for the management of surface water on major development. Applicants are now asked to complete a checklist supplying information on sustainable drainage proposals with major planning applications.

1.3 The Lead Local Flood Authority (LLFA) for Braintree District is Essex County Council. The County has, through the Sustainable Urban Design Guide Working Group and Steering Group, produced a Design Guide for SuDS within Essex. This Guide has been subject to consultation with key stakeholders and the public and was published by Essex County Council in December 2014. The County has requested that Essex District Planning Authorities consider adopting the SuDS Design Guide as a Supplementary Planning Document.

1.4 The SuDS Design Guide can be found at the following link <http://www.essex.gov.uk/Environment%20Planning/Environmental-Issues/local-environment/flooding/View-It/Pages/Sustainable-drainage-systems.aspx> and itself is divided into 8 sections, each of which is summarised below;

- Section 1 includes background information about the shift towards the increased use of sustainable drainage to manage surface water including the multiple benefits that they can deliver as part of sustainable development. (These include useful landscape, ecological and amenity benefits).
- Section 2 provides an overview of the design considerations specific to Essex that need to be considered when sustainable drainage systems are being designed such as topography, geology, soils and hydrology.
- Section 3 explains 12 principles and local standards for water quantity and quality to be followed when planning and designing SUDS in terms of flood prevention and amenity, ecology and water management. The local principles and standards are intended to supplement national standards when sustainable drainage systems are being designed.
- Section 4 also provides an introduction to the main types of sustainable drainage systems that can be built and the circumstances where they are most appropriate. This is illustrated through a series of worked examples of major types of development to show how sustainable drainage schemes can potentially be fitted into real life situations. It also includes successful case studies.
- Sections 5 – 8 include appendices, a glossary of terms, references and a figures table respectively.

1.5 The SuDS Design Guide is intended to act as a common reference for those wishing to develop in Essex. It informs developers of the basis on which planning application consultations will be viewed by the LLFA, particularly in relation to design. Whilst Braintree District Council is unable to adopt third party documents, and hence this Guide, as Supplementary Planning Guidance, it can be given weight as a material consideration in the same way as the Essex Design Guide and Parking Standards.

1.6 There are issues which should be considered when applying the SuDS Design Guide requirements and these should be considered where relevant for each major development. The Guide does not deal in great detail with all of the issues which are

required in order for SUDs to function properly (maintenance and conditions required to protect development during construction) and some of the design criteria it advocates are outlined in other documents (e.g. The SuDS Manual CIRIA 2007).

1.7 It promotes the dual use of land for SuDS and for open space and whilst this can work, not all features used as a means of drainage may be usable or acceptable forms of open space and might need to be excluded from open space calculations. The benefits of having a dual use for SUDs should be considered with the need for high quality open space as set out in the Council's adopted SPD: Open Space (and any successors to this document).

1.8 The SuDS Design Guide gives preference to surface water infiltration measures. However these features may not be appropriate in soil conditions frequently found in the district, notably in clay soils where infiltration may be slow. It is unclear how far proposals which vary from the preferred means of drainage due to technical difficulties will be viewed by the County Council.

1.9 The SuDS Design Guide does not make detailed recommendations regarding maintenance arrangements. The House of Commons Written Statement (HCW161) states that maintenance arrangements are necessary and could be dealt with by planning condition or legal obligations. Such arrangements are necessary to the continued operability of the SuDS though will not be resolved as part of this document.

1.10 In addition to the above, National Planning Policy Framework Paragraph 153 requires that Supplementary Planning Guidance should be used where they can help applicants make successful applications or aid infrastructure delivery but not add unnecessarily add to the financial burdens on development. The SuDS Design Guide contains elements which although desirable may not sustain a planning refusal.

1.11 Nevertheless, the Sustainable Drainage Systems Design Guide is a useful guide to approaching the design and layout of SUDS.

2 Recommendation

The Sustainable Drainage Systems Design Guide (Dec 2014: Essex County Council) to be approved as planning guidance.