

LOCAL PLAN SUB-COMMITTEE AGENDA

Thursday, 10 November 2016 at 06:00 PM

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

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

Membership:-

| | |
|--|-------------------------------|
| Councillor D Bebb | Councillor Mrs J Money |
| Councillor Mrs L Bowers-Flint (Chairman) | Councillor Lady Newton |
| Councillor G Butland | Councillor J O'Reilly-Cicconi |
| Councillor T Cunningham | Councillor Mrs W Scattergood |
| Councillor D Hume | Councillor Miss M Thorogood |

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

N BEACH
Chief Executive

INFORMATION FOR MEMBERS - DECLARATIONS OF INTERESTS

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

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| PUBLIC SESSION | | Page |
|-----------------------|--|----------------|
| 1 | Apologies for Absence | |
| 2 | Declarations of Interest To declare the existence and nature of any Disclosable Pecuniary Interest, other Pecuniary Interest, or Non-Pecuniary Interest relating to Items on the Agenda having regard to the Code of Conduct for Members and having taken appropriate advice where necessary before the meeting. | |
| 3 | Minutes of the Previous Meeting To approve as a correct record the Minutes of the meeting of the Local Plan Sub-Committee held on 31st October 2016 (copy to follow). | |
| 4 | Public Question Time (See paragraph above) | |
| 5 | Braintree Draft Local Plan - Housing Target | 4 - 19 |
| 6 | Braintree Draft Local Plan - Consultation Responses | 20 - 52 |
| 7 | 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. | |
| 8 | Exclusion of the Public and Press To agree the exclusion of the public and press for the consideration of any Items for the reasons set out in Part 1 of Schedule 12(A) of the Local Government Act 1972. | |
| | <i>At the time of compiling this Agenda there were none.</i> | |

| PRIVATE SESSION | | Page |
|------------------------|--|-------------|
| 9 | 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. | |

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|---|--|-------------------------|
| The Braintree District Draft Local Plan Housing Target | | Agenda No: 5 |
| <p>Corporate Priority: A well connected and growing District with high quality homes and infrastructure</p> <p>Portfolio: Planning and Housing</p> <p>Report presented by:</p> <p>Report prepared by: Kathryn Carpenter</p> | | |
| Background Papers: | | Public Report |
| <p>Objectively Assessed Housing Need Study, Peter Brett Associates, October 2016</p> <p>Objectively Assessed Housing Need Study, Peter Brett Associates, July 2015</p> <p>2014 based subnational population projections, Office for National Statistics, 25 May 2016</p> <p>2014 based subnational household projections, Department for Communities and Local Government, 12 July 2016</p> <p>East of England Economic Forecasts, 2016</p> <p>Braintree District Council Draft Local Plan June 2016</p> | | Key Decision: No |
| Executive Summary: | | |
| <p>Braintree District Council is in the process of considering representations submitted in the consultation on the Draft Local Plan. These include representations on the draft Local Plan target for the number of new homes. The current draft Local Plan proposes a target of an average of 845 new homes per year from 2016 (the date of publication of the Draft Local Plan) to 2033. This target is based on the 2015 Peter Brett Associates (PBA) study of Objectively Assessed Housing Need (OAHN) for the Strategic Housing Market Area of which Braintree is a part. That study was informed by the 2012 based subnational projections and the 2014 East of England Forecasting Model (EEFM) report.</p> <p>This report considers the findings of an update to the OAHN, dated October 2016. The 2016 study was informed by the 2014 based subnational projections and by the 2016 EEFM forecasts.</p> <p>This report considers what should be the Local Plan target for new homes in Braintree District and recommends a Local Plan target of an annual average of 788 homes over the period from 2013 (the base date of the study) to 2033. Adding in the backlog of homes not yet delivered from 2013, this is a total Local Plan target of 14,646 or 862 new homes per year.</p> | | |
| Decisions: | | |
| Members are requested to agree the recommendations set out below: | | |

Recommendation A: That the 2016 update to the Objectively Assessed Need Study be added to the evidence base for the new Local Plan

Recommendation B: That the Local Plan target for new homes in Braintree District is based on an annual average of 862 homes for the Plan period 2016-2033.

Purpose of Decision:

To agree the level of development of new homes to be proposed in the Draft Local Plan for Braintree District, for the purposes of consultation and as the context for considering the Pre Submission Local Plan.

Corporate Implications

| | |
|---|---|
| Financial: | The production of Local Plan will be funded from the base budget. |
| Legal: | Braintree District Council is required to set out a target for new homes in the Local Plan |
| Safeguarding: | None |
| Equalities/Diversity: | The Local Plan will be subject to an equalities impact assessment |
| Customer Impact: | Providing homes, employment and infrastructure |
| Environment and Climate Change: | Impact on environment of increased scale of development |
| Consultation/Community Engagement: | Community engagement will take place on the new Local Plan. |
| Risks: | That the Local Plan may not be found sound when it is examined by the Planning Inspector. That the market may fail to deliver the plan target, leading to an increasingly unrealistic target for the remainder of the plan period in order to make good the backlog –to which target a 20% “buffer” requirement is then added. That the District will no longer benefit from a plan-led system, with the scale and distribution of growth determined instead via planning applications and appeals. That there could be uncertainty for local communities and for stakeholders who need to plan and manage the social and physical infrastructure of the District. |
| Officer Contact: | Kathryn Carpenter |
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Background

1. This report sets out the key findings of the updated Objectively Assessed Housing Need (OAHN) Study which has been prepared by consultants Peter Brett Associates (PBA) for the Strategic Housing Market comprising Braintree, Chelmsford, Colchester and Tendring districts. The Executive Summary of the Study is attached as an Appendix to this report.
2. The updated study takes into account the latest (2014-based) Government population and household projections, and updated employment forecasts published by the East of England Forecasting Model (EEFM) and Experian, together with information on market signals and demographic trends.
3. The OAHN provides the baseline annual number to inform the Local Plan target for new homes, and will also be used as the basis of calculating the current five-year housing land supply.

The Local Plan Target

4. Currently the Draft Braintree District Local Plan (2016) requires an annual average of 845 new homes to be built in the District between 2016 and 2033 – a total of 14,365 homes over the Plan period. The base date of the evidence used in assessing that target was 2013. In basing the Plan target from 2016 the Draft Plan did not address the “backlog” accrued in the period 2013-2016 (the amount by which the supply of new homes fell short of the emerging target), and this approach does not comply with current planning guidance.
5. The revised OAHN report recommends a target of 716 new homes per year from 2013. This takes into account a range of market signals and the need to support employment need in the District and represents an uplift from the government estimated demographic starting point. If the Council continued to base its Local Plan target from 2016, this would mean a total of 12,172 new homes for the Plan Period 2016-2033 (a decrease of 2,193 compared to the current Draft Plan proposals).
6. However, it is recommended that the base target of 716 be adjusted to increase its robustness at the Local Plan Examination:
 - By taking into account the backlog from 2013: From 2013-2016 a total of 1,114 homes were completed, which was an average of only 371 per year.
 - By applying an additional 10% uplift to the base target. The economic projections on which the OAHN is based are difficult to predict at local authority level, and may be subject to further fluctuations in the future. The proposed additional uplift of 10% will provide a reasonable buffer which will help to protect the District against future fluctuations.
7. These two adjustments together lead to a Local Plan target over the Plan Period 2016-2033 of 14,646 homes, an annual average of 862. The basis for this calculation is explained in the table below:

| | Revised OAHN, 2016 |
|---|---------------------|
| Base OAHN as per PBA report, annual average from 2013 | 716 per year |
| Plus 10% uplift, from 2013 | 788 per year |
| New homes completed 2013-2016 | 1,114 (371 p.a.) |
| Backlog ((788 X 3) -1,114) | 1,250 |
| 17 years at 788 new homes, 2016-2033 | 13,396 |
| Plus backlog accrued 2013-2016 | 1,250 |
| = Proposed updated Local Plan target 2016-2033 | 14,646/862 per year |

8. The objective assessment of housing need is based on meeting the demographic based need indicated in up to date population and household projections, plus such uplift as may be indicated to meet expected demand for labour supply, having regard also to market signals. At an annual average of 788 per year from 2013, the recommended Local Plan target provides for an uplift of 26% over the demographic-based projected need (623 p.a.), and would provide for a margin of 12% over the need indicated by the current EEFM jobs-led forecasts (702 p.a.). It is considered that this provides a reasonable margin to the reduced OAHN figure.
9. If the OAHN had remained at 845 homes per year, then given taking into account completions 2013-2016 there would have been a backlog of 1,421 homes which would have meant a revised target of 929 homes per year for 2016-2033 (a total for the Plan Period of 15,786; 1,140 more than is recommended in this report).
10. In respect of the other three districts in the Strategic Housing Market Area, the recommended OAHN is as follows (expressed as annual average from 2013 and excluding any backlog):
 - Chelmsford 805 (increase of 30)
 - Colchester 920 (unchanged)
 - Tendring 550 (was originally 597 but had been revised to 550, so unchanged).

Comments Received during the consultation

11. Responses to the Draft Local Plan consultation have also been received in relation to the housing number as set out in the Draft Local Plan. These comments have primarily be made to policy SP2 'Meeting Housing Need' which is in the shared strategic plan and LPP16 'Housing Provision and Delivery'. The comments which are reported here relate to the overall number of homes being proposed in the Draft Plan. Comments which are dealing with the spatial strategy and distribution of those homes will be considered at a later Local Plan Sub Committee.
12. The comments on housing numbers can be summarised as follows;

- Uttlesford DC – BDC is committed to meeting its housing need which avoids putting pressure on Uttlesford. However if it were to provide more housing then this may result in additional out commuting which impacts on UDC.
- Consider net additional target of 845 is a positive yet realistic approach to meeting the housing needs of the District.
- 14,365 new homes is welcomed as this accords to the government policy of significantly boosting the supply of new homes and allows flexibility to deliver higher numbers where possible.
- Neighbouring authorities have unmet need but it is not clear if these have been considered.
- Tendring DC has 47 dwellings per year not being met. It is not clear if these are to be in Braintree, Chelmsford or Colchester
- Braintree should have regard for the shortfall in London
- Braintree is more impacted by the West Essex/East Herts, Chelmsford and GLA HMAs more than the Council seeks to acknowledge
- Maldon DC are part of this SHMA and ignoring them could mean that the Council is planning for the wrong housing target
- Tendring District Council note that a start date of 2013 would be helpful in the determination of housing need, to reflect the approach used by the other local authorities in the Housing Market Area.
- As the OAN runs from 2013, it is necessary to consider completions between 2013 and now. The Plan must address this backlog
- 1,416 homes should be provided to meet the shortfall within this Plan period.
- The local authority should meet the backlog within the first five years, alternatively it must work with neighbouring authorities to immediately address this need
- Plan talks about 10,000 homes, yet the table talks about 14,365 or is it 24,365 in Braintree?
- These are pre-Brexit decision numbers and should be revised
- 845 per year is not sufficient to meet housing need. The figure should be updated to use the 2014 household projections
- Authorities should consider as part of their OAN how they can improve affordability over the lifetime of the Plan to enable a step change of affordability and how it can be delivered in the Plan, as advocated in the PPG
- Affordable housing has not been factored into the figure for OAN
- We are not convinced that the OAN is correct as there is clear justification for upping the figure in affordability terms
- The Strategic Housing Market Assessment does not appropriately assess affordable need
- The OAN acknowledges the unaffordability of Braintree but does not suggest any solutions. Inspectors in places like Eastleigh and Lewes have required a housing uplift
- Two SHMA's have been produced in a short space of time which produce very different results. The methodology of the latest SHMA is clearly flawed and should be re-examined
- Housing provision is inadequate as it fails to take into account the housing shortage shown through the electoral register where ¼ of young adults live

with their parents and therefore there is a 6,540 home shortage or 45% of the planned housing supply.

- Definition of government overcrowding does not accord with the English culture of nuclear family. Deviation from this should be counted as overcrowding and the methodology used does not take account of this
 - No evidence that localised factors such as past delivery and land supply have been taken into account when considering the OAN figure
 - Flexibility and review points should be built into the Plan so that estimates of future need may be revised and possibly reduced to respond to economic and demographic changes
 - Reference should be made to the fact that these are minimum figures
 - Housing trajectory proposes a delivery rate in the later years of the plan which has never been achieved
 - It could be argued that BDC has underperformed since 2010 against the adopted targets and as such should be applying a buffer of 20%
 - Consideration should be given to applying a 20% buffer
 - We do not believe the Council has a robust five year supply as it relies on sites which do not have planning permission
 - Housing requirement in SP2 is a minimum, yet the Draft Local Plan only makes allocations for 13,420 new homes. No certainty that all of the housing allocations will be brought forward
 - No allowance for a lapse rate has been made in the figures
 - Authorities should separate identifying the full OAN before they go on to consider the ability of the LPA to accommodate that level of development
 - Number of homes being allocated in the Plan represents only 93% of the OAN
 - Where is the evidence to support the anticipated 100% plus increase in housing completions over the Plan period
13. Officer Comments: A number of the comments are suggesting changes to the methodology of the OAHN and these have been addressed in the updated report, by using the latest government and other projections. Market signals and affordability are also looked at within that report, as there were previously and are responsible for the overall uplift in housing numbers from the governments starting point as required by national government policy.
14. One respondent suggests we should take further account of what they believe as a significant level of overcrowded and concealed households in the District which they have derived from the electoral register. However the consultant's report, following national guidance finds very differently, that both these issues are significantly less in Braintree than the national averages.
15. Several responders including Tendring note the requirement for BDC to include the shortfall in OAHN from 2013 onwards, where actual completions have not matched the OAHN target figure. This would be in line with government guidance and as such it is recommended that this backlog is added to the BDC housing need figure to be provided in this Plan, as set out in the recommendations to this report.
16. Several objectors have expressed concerns regarding the methodology of the Strategic Housing Market Assessment (SHMA) 2015 and how affordable housing has been taken into account in setting the OAHN figure. As set out in

planning guidance, affordable housing is not a component of OAN but is a policy consideration that is considered when setting the final Local Plan target. There have been two main directions in the objections to the SHMA;

17. That the SHMA underestimates affordable housing need - The latest SHMA is based on the updated guidance which was released during the writing of the previous SHMA. As the government methodology had changed quite significantly a further iteration of the SHMA was commissioned to ensure it met the latest guidance position. Various assumptions have to be made as part of that work and the reports sets out what the Council considers as sound justification for those, including the agreement of those who attended the developer workshop which was held as part of the work on the document.
18. That the OAN fails to take account of the identified housing need - The SHMA identifies 212 affordable homes per year for Braintree, and the suggested figure that we are suggesting that we plan for is 788 new homes (excluding the addition of the shortfall from previous delivery). 212 equates to around 27% of the total housing need. Whilst it is of course acknowledged that not all sites in the District will generate affordable housing but that some will generate 100% affordable housing, the targets of 30% in urban areas and 40% in rural areas are considered by officers to be capable of delivering this level of affordable housing need. As such no further uplift to the figures on the basis of affordable housing need is considered necessary.
19. Several objectors also note concerns about unmet need of neighbouring local authorities which Braintree should seek to be addressing in its Plan. Braintree has not been approached by any neighbouring authority under the Duty to Co-operate, and is not aware of any unmet need from neighbouring authorities. In terms of London, this has been considered by our consultants who have compared the Greater London Authority modelling compared to our own. It does suggest a small increase in the number of people expected to move out of London to our HMA, compared with the DCLG starting point. But this small uplift is more than met by the uplift which is being added to the OAN figure to reflect other factors.
20. Amendments to the text will be made to ensure that it is clear that the OAN is a minimum housing delivery target for the District.

Recommendation A: That the 2016 update to the Objectively Assessed Need Study be added to the evidence base for the new Local Plan

Recommendation B: That the Local Plan target for new homes in Braintree District is based on an annual average of 862 homes for the Plan period 2016-2033, and that site allocations are based on identifying sufficient supply to meet that target.

Braintree District Council
Chelmsford City Council
Colchester Borough Council
Tendring District Council

Objectively Assessed Housing Need Study
October 2016 Update
Executive Summary

Peter Brett Associates

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Project Ref 33171

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Introduction

- 1 This report updates the Objectively Assessed Housing Need Study produced by Peter Brett Associates (PBA) in July 2015 for Braintree, Chelmsford, Colchester and Tendring Councils. Its purpose is to review the findings of the original report in the light of new evidence, producing a revised housing needs assessment for the same period, 2013-37.
- 2 Following the method set out in the National Planning Practice Guidance (PPG), the 2015 study covered five broad topics:
 - i Defining the housing market area – to draw the boundary of the geographical area that the assessment should cover;
 - ii Demography – to arrive at a trend-based projection that provides the ‘demographic starting point’ of the needs assessment;
 - iii Past provision and market signals – to determine if the starting point should be uplifted in the light of market evidence;
 - iv Future jobs – to determine if the starting point should be uplifted on the interest of labour market alignment, in order to provide enough workers to meet the future demand for labour;
 - v Affordable housing – to summarise the findings of the separate study commissioned by the Councils and its relationship to the OAN assessment.
- 3 In relation to the first of these points, the definition of the housing market area, no new evidence has emerged since the 2015 study. Hence our conclusion, that the four client authorities form a housing market area within the meaning of the National Planning Practice Guidance (OAN) remains unchanged.
- 4 By contrast, as regards demography much new evidence has come to light, including the 2014-based official demographic projections. The main task of this update is to draw the implications of these new data. The report first considers implications for the ‘demographic starting point’ and then turns to labour market balance. It goes on briefly to discuss market signals - where the position has not changed significantly – and affordable housing need – where there is no new evidence on the level of need, but the national context has shifted slightly.
- 5 Below, we summarise our findings for Braintree, Chelmsford and Colchester in the next section and for Tendring in the following section. The reason for this separation is that the analysis for Tendring takes a different approach, to correct the severe distortions due to Unattributable Population Change (the UPC).

Braintree, Chelmsford and Colchester

- 6 Table 1 below summarises our updated analysis for the three districts of Braintree, Chelmsford and Colchester. It also compares the results with those of the 2015 study. In the table, the sequence of columns follows the stages of the OAN calculation. We discuss each stage in turn below. All figures relate to change per annum over the plan period 2013-37.

Table 1 Summary assessment: Braintree, Chelmsford and Colchester

| Change p.a. 2013-37 | ONS / CLG projections | | Trends 2005-15 | Market signals | | Edge Phase 7 | | EEFM 2016 | | Experian 2016 | | Updated OAN | |
|------------------------|-------------------------|-------------------------|-------------------|----------------|----------------------------|---------------------|---------------------|-----------|-----------|---------------|-----------------------------|-------------|---------------------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 |
| | Dwellings 2012-based | Dwellings 2014-based | Dwellings | Uplift | 2014-based dwlg+ uplift | Jobs (EEFM 2014) | Dwellings (Edge) | Jobs | Dwellings | Jobs | Constrained by ONS 2014? | Dwellings | Change from SHMA |
| Braintree | 687 | 623 | 507 | 15% | 716 | 608 | 845 | 490 | 702 | 461 | No | 716 | -129 |
| Chelmsford | 657 | 671 | 429 | 20% | 805 | 1,013 | 775 | 725 | 706 | 952 | No | 805 | 30 |
| Colchester | 870 | 866 | 1,207 | 0% | 866 | 601 | 920 | 928 | 920 | 1,109 | No | 920 | 0 |
| Three districts | 2,214 | 2,160 | 2,143 | 11% | 2,388 | 2,222 | 2,540 | 2,143 | 2,328 | 2,522 | | 2,441 | -99 |

Source: ONS, CLG, Edge Analytics, EEFM, Experian, PBA.

Demography

- 7 In the table, the first column of data shows the housing need derived from the 2012-based official household projection from the Department of Communities and Local Government (CLG 2012), which was the basis of the 2015 housing needs assessment. The second column shows updated figures derived from the new 2014-based projection (CLG 2014), published in July 2016:
 - For the three districts together the figure is virtually unchanged, from 2,214 net new dwellings per annum (dpa) in CLG 2012 for 2,160 dpa in CLG 2014.
 - At the level of individual districts the two projections are also very close. For Braintree, the figure falls by just 64 dpa (9%) between the 2012 and 2014 projections. For the other two districts the differences are even smaller.
- 8 Behind these insignificant differences there are two main factors, both relating to the national assumptions that inform the 2014-based ONS population projections, from which the CLG household projections are derived. Firstly, the 2014-based projections assume more net migration to the UK than the previous version, though this only impacts on Colchester and Chelmsford. Secondly, the new projections assume shorter life expectancies and hence higher mortality rates, so there are fewer elderly people. These factors impact on household numbers, and hence on housing need, in opposite directions. Other things being equal, more population means more households; but fewer elderly people means fewer households for a given population, because older people tend to live in smaller households.
- 9 Colum 3 of the table shows an alternative demographic scenario, created by PBA, which we use as a sensitivity test. While the the official projections are based on rolling forward the migration trends of the last five or six years, our Trends 2005-15 scenario is based on a 10-year period; it is also updated to take account of the latest population data, from the ONS 2015 Mid-Year Population Estimates, which post-date the latest official projections.
- 10 For the area as a whole (though not for individual districts) the Trends scenario produces virtually the same result as CLG 2014. This suggests that for the three districts the 2014 projections are not unduly affected by short-term fluctuations that distort underlying migration trends.
- 11 From this sensitivity testing and other demographic analysis we conclude that the CLG 2014 projection is a reasonable reflection of past demographic trends. This means that it is the appropriate 'demographic starting point' for the housing needs assessment.

Past provision and market signals

- 12 Our updated analysis of market signals shows no significant change in the relative position of the three districts since the 2015 study. In that study we concluded that the market signals uplift for the HMA as a whole should be in the region of 10%, and did not draw conclusions on uplifts for the individual districts. There was no need for such conclusions, because 'market signals' and 'future jobs' uplifts overlap, and we

judged that the future jobs uplifts we were applying exceeded any market signals uplift that could possibly justified.

- 13 In the present update, as discussed later in this document we provide a new analysis of future jobs, which in two of the three districts produces lower housing numbers than the 2015 version. Therefore we have re-examined the evidence on past provision and market signals, aiming to advise on possible uplifts for each district. In line with the PPG there is no clear 'scientific' basis for determining these adjustments; they depend on judgment as well as evidence. In our judgment the following uplifts are justified:
- Braintree: 15%, mainly because housing land supply may have been constrained in the period whose trends the demographic projection rolls forward, and because affordability is poor.
 - Chelmsford 20%, also due to possible supply constraints in the past and poor affordability, plus relatively high house prices.
 - Colchester 0%, because we found no evidence of undersupply.
- 14 These percentages, and the uplifted housing numbers that result, are shown at Columns 4 and 5 of Table 1.

Future jobs

- 15 In the 2015 study, our recommended 'future jobs' uplifts were based on the *Greater Essex Demographic Forecasts Phase 7* study, produced by Edge Analytics for the Essex Planning Officers Association (EPOA). The Edge study started from the job forecasts shown in the 2014 East of England Economic Forecasting Model (EEFM). In its 'Employed People scenario' the study estimated the housing growth that would be required to accommodate enough workers to fill this demand for jobs.
- 16 The job growth forecast by EEFM 2014 is in Column 6 of Table 1 and the resulting housing need figures calculated by Edge in Column 7. In the 2015 study, we concluded that this Edge estimate of the job-led housing need provided the best available objective assessment of housing need over the plan period. For the area as a whole this OAN equalled 2,540 dpa – a 15% uplift against the 'demographic starting point'.
- 17 In the present update we have revisited the calculation of labour market balance, based on a new version of the East of England forecast, EEFM 2016. This time there are no Edge estimates of the housing implications of EEFM, because the EPOA has not commissioned a new phase of the Essex Demographic Forecast. But the gap is filled by the economic forecast itself. While EEFM 2014 only ran to 2031, EEFM now extends to the end of the plan period in 2037 and beyond. And EEFM provides its own figure on job-led housing growth. This figure, labelled 'demand for dwellings' shows how many new homes will be required to house enough workers to meet the forecast demand for labour.
- 18 In Table 1, Column 8 shows the job growth predicted by EEFM 2016 for the plan period and Column 9 shows the demand for dwellings that is part of the same forecast. For the three districts together the new forecast shows very slightly lower job growth than the old one – 2,143 net new jobs p.a. against 2,222 in EEFM 2014.

It also shows slightly lower housing need, at 2,328 dpa against 2,540 dpa in the Edge report that informed the 2015 OAN study.

- 19 Against the demographic starting point (CLG 2014), for the three districts together the updated job-led housing figure represents an uplift of 9%. For each district the job-led figure is greater than the demographic starting point, suggesting that the population growth shown in the official demographic projections would not provide quite enough workers to meet labour demand over the plan period.
- 20 Although the EEFM housing demand produces similar results to those from Edge, we consider that the EEFM version is technically more robust, because it integrates economic with demographic modelling, using consistent assumptions and methods though the whole analysis.
- 21 Given that economic forecasting is highly uncertain, in the 2015 study we checked the EEFM / Edge analysis against a second opinion, from Experian. We have repeated this exercise using the latest version of Experian's local forecasts, dated September 2016. The results are at Columns 10 and 11 of Table 1.
- 22 Unlike EEFM, Experian does not forecast the population and housing that would be needed to meet the demand for labour. Rather, it forecasts how many jobs an area will accommodate if population change as shown in the 2014-based official demographic projections; and it estimates whether that population will provide enough workers to meet demand. If the population is not enough, this means that job growth would be constrained by the labour supply resulting from the official projections, and therefore the projections should be uplifted.
- 23 From Column 10 of the table we can see that for the area as a whole Experian 2016 forecasts show more job growth than EEFM 2016 – 2,522 jobs p.a. (Experian) against 2,143 in EEFM 2016. But in regard to demographic implications the two forecasters disagree. For all three districts, Experian estimates that the officially projected population will be enough or more than enough to meet labour demand over the plan period, so there is no need for a 'future jobs' adjustment.
- 24 In the spirit of positive planning, we base our conclusions below on the EEFM analysis rather than Experian's, because EEFM implies higher housing need.

Objectively assessed housing need

- 25 As explained in the 2015 OAN report, the market signals uplift and future jobs uplift overlap. Therefore the objectively assessed housing need is the greater of:
 - The market-signals-adjusted figure at Column 5 of Table 1
 - The future-jobs-uplifted figure at Column 9 of the table.
- 26 For the three districts together, these two figures give almost exactly the same answer. The total OAN of 2,441 dpa for the three districts is also very close (within 5%) the 2,540 dpa calculated in the 2015 study.
- 27 For Braintree the updated calculation assesses housing need at 716 dpa, against 845 dpa in the 2015 study. Behind this 15% reduction are decreases in both the official demographic projection and the EEFM view of future jobs. Braintree Council may choose to reflect this reduction in its emerging Local Plan. Alternatively it may

consider it prudent to leave the target unchanged, given that projections and forecasts are unstable might produce higher numbers in future. For Chelmsford the updated OAN is 805 dpa, close to the 775 dpa in the 2015 study, and for Colchester it remains exactly the same at 920 dpa.

Tendring

Earlier results

- 28 In the July 2015 OAN study we assessed Tendring's housing need over the plan period as 597 dpa. Like the OAN for the rest of the HMA, this was based on the job-led Employed Persons scenario in the Phase 7 Edge study. It was below the CLG 2012 household projections, which implied a 'demographic starting point' of 705 dpa. We found that an OAN lower than the official projections was justified in this case, because the projections were severely distorted by Unattributable Population Change (UPC), which is an error in the demographic official statistics. The Edge Employed Persons scenario aimed to correct this error, as well as checking that the projected population would provide enough workers to meet labour demand.
- 29 However, after the OAN study was completed and published the ONS released a report and data tool that provided further formation about the UPC. The new data suggested that the Edge Employed Persons scenario overestimated housing need, because it was based on the wrong age profile, with too many older people – who tend to live in smaller households.
- 30 Tendring Council commissioned PBA to review the findings of the OAN report in the light of the new information. The resulting report was published by the Council in January 2016, as an update to the 2015 OAN study. It recommended a revised 'demographic starting point' of 480 dpa for Tendring over the plan period. We advised that this number was the best available estimate based on available information. But it should be used with great caution, because the size of the UPC made all demographic analysis potentially subject to large error.
- 31 With a market signal adjustment applied PBA recommended an OAN range of 500-600 dpa with 550 dpa adopted where a single number was needed. Testing of this number showed no need for any economic uplift. Testing of this number through the Experian model suggested that it did not require a 'future jobs' uplift

The October 2016 update

- 32 The 2014-based official projection sets a 'demographic starting point' for Tendring of 675 dpa. This is very close to the 705 in the same version of the projections. Our technical audit show that the 2014 projections are affected by the same errors as the 2012 ones, and hence they overstate housing need in the same way. The ONS is currently reviewing mid-year population estimates for the years since the 2011 Census, in order to eliminate these systematic errors. But the results will only become available in 2017.
- 33 For now, our analysis of the latest demographic data suggests that the correct 'demographic starting point' remains 480 dpa, with a large potential error. Our

analysis of past provision and market signals shows that Tendring's position has not changed, so we still consider that a market signals uplift to 550 dpa is justified. As before, Experian's analysis suggests that there is no need for 'future jobs' uplift.

- 34 In summary, our best assessment of housing need for Tendring over the plan period remains 550 dpa.

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| Braintree Draft Local Plan – Responses Received to the Draft Local Plan | | Agenda No: 6 |
| <p>Portfolio: Planning and Housing Corporate Outcome: Securing appropriate infrastructure and housing growth</p> <p>Report Presented by: Report Prepared by: Gary Sung, Sean Tofts and Alan Massow</p> | | |
| <p>Background Papers:</p> <ul style="list-style-type: none"> • National Planning Policy Framework (NPPF) • National Planning Practise Guidance (NPPG) • Localism Act (2011) • Planning and Compulsory Purchase Act (2004) • Local Plan Review (2005) • Core Strategy (2011) • Settlement Boundary Review Methodology (2015) • New Draft Local Plan (2016) | | <p>Public Report: Yes Key Decision: No</p> |
| <p>Executive Summary: This report looks at the villages of Stisted, Sible Hedingham, Rivenhall, Rivenhall End (excluding sites on the edge of Witham), Rayne, Castle Hedingham and Bradwell with Pattiswick (excluding the new site known as Monks Wood) The report takes each area in turn and sets out the summary of comments received and considers any new sites which have been put forward. Based on this an officer recommendation for any further changes to the Plan is then set out. Maps of the sites and the proposed Inset maps for the villages with development boundaries to be contained within the Pre Submission Local Plan are contained within a separate Appendix. The report also looks at policies in relation to transport where these are not site specific. The policies and supporting text are set out in full in italics in the report with changes in text highlighted with deletions in strikethrough and additions in bold and underlined.</p> | | |
| <p>Decision:</p> <p>Recommendation A - That the Inset Map for Stisted remain unchanged from that in the draft Local Plan, as shown in the Appendix.</p> <p>Recommendation B - The Inset Map for Sible Hedingham to be amended to include SIBH617 within the existing residential site allocation, as shown in the Appendix</p> | | |

Recommendation C – LPP 5A to be modified as shown

Recommendation D – The Inset Map 48 to be renamed to Allshots Farm, but no further changes made to the Inset Map as shown in the Appendix.

Recommendation E – The Inset Map for Rivenhall to remain unchanged from that in the draft Local Plan, as set out in the Appendix

Recommendation F – The Inset Map for Rivenhall End to remain unchanged from that in the draft Local Plan, as set out in the Appendix

Recommendation G - That the Inset Map for Rayne remain unchanged from that in the draft Local Plan, as shown in the Appendix

Recommendation H - The Inset Map for Castle Hedingham be amended to remove the strip of informal recreation, as shown in the Appendix

Recommendation I - That the Inset Map for Bradwell remain unchanged from that in the draft Local Plan, as shown in the Appendix.

Recommendation J – That Pattiswick remain within the countryside, as set out in the Draft Local Plan.

Recommendation K: Policy LPP36 Sustainable Access for All (Sustainable Transport) to be amended in accordance to the changes shown

Recommendation L LPP 37 Parking Provision to be amended as shown.

Recommendation M: LPP 38 Protected Lanes to be amended as shown.

Purpose of Decision:

To consider the responses to the Draft Local Plan consultation in relation to these villages and chapters and make any changes as a result of the comments.

Corporate implications

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|---|--|
| Financial: | The preparation of the Plans set out within the Local Development Scheme will be a significant cost which will be met through the Local Plan budget. |
| Legal: | To comply with Governments legislation and guidance. |
| Equalities/Diversity: | The Councils policies should take account of equalities and diversity. |
| Safeguarding: | None |
| Customer Impact: | There will be public consultation during various stages of the emerging Local Plan. |
| Environment and Climate Change: | This will form part of the evidence base for the emerging Local Plan and will inform policies and allocations. |
| Consultation/Community Engagement: | There will be public consultation during various stages of the emerging Local Plan. |
| Risks: | The Local Plan examination may not take place. The Local |

| | |
|-------------------------|--|
| | Plan could be found unsound. Risk of High Court challenge. |
| Officer Contact: | Emma Goodings |
| Designation: | Planning Policy Manager |
| Ext. No. | 2511 |
| E-mail: | Emma.goodings@braintree.gov.uk |

1 Background

- 1.1 Braintree District Council is working on a new Local Plan which will guide development in the District between now and 2033. Once adopted this will replace the 2011 Core Strategy and the 2005 Local Plan. As part of the Local Plan, the Council is required to boost significantly the supply of housing as set out in the National Planning Policy Framework.
- 1.2 In 2013 and 2014 the Council consulted on the Site Allocations and Development Management Plan document. This included a proposed new inset map for all defined settlements (towns and villages) within the District. During this time significant detailed revision of many of the inset maps were considered. For the new Local Plan these maps will provide a starting point for any further changes and updates required.
- 1.3 The preferred Inset Map for each defined settlement, together with a map showing the alternative site options that were considered and not taken forward will be contained within the draft Local Plan for public consultation in the summer.
- 1.4 There is no specific housing target for each area and all sites will be assessed on their merits. If, when all towns and villages have been through Local Plan sub-committee, not enough sites have been chosen for development, then additional sites will need to be considered and added to the proposed list of allocations.
- 1.5 The villages which are being considered today are most of the smallest villages in the District and as such are considered some of the least sustainable.
- 1.6 The Plan includes 68 strategic and non-strategic policies set around 3 key themes, A Prosperous District, Creating Better Places and The Districts Natural Environment. The Plan also includes a shared strategic section of the Plan and 10 policies (prefixed SP) which are replicated in Colchester and Tendring Local Plan. All comments received by each of the three authorities within their consultation periods are being co-ordinated and a single report will

be produced on the responses to this section.

- 1.7 Full Council on the agreed the new Draft Local Plan for public consultation at its meeting on the 20th June 2016.
- 1.8 The Local Plan was subject to an 8 week public consultation which started on the 27th June and concluded on the 19th August.
- 1.9 A total of 3,056 comments have been received from 1,245 individuals. These are all available in full on the website at www.braintree.gov.uk/consultLP and we would ask all Members to read these comments.
- 1.10 An update to the Sustainability Appraisal (SA) has been undertaken to include new sites submitted to the Local Plan. To maximise the contribution that the Local Plan makes to the achievement of sustainable development and minimise any potential adverse impacts, members should have regard to the SA and consider any reasonable alternative options to the chosen policy or allocation. The Council will need to show how environmental considerations have been integrated into the plan and how the SA has been taken into account.
- 1.11 The settlements and chapters are now considered individually below, including a summary of the comments received. Policies and supporting text are set out in full in italics and changes can be seen with strikethroughs for deletions and underline for new text.

2 Stisted

- 2.1 Stisted is located approximately 1 mile north of the A120 within Coggeshall Ward. It has a number of local services and facilities including a primary school, pub, allotments, and formal and informal recreation opportunities. Permission for a Gypsy and Traveller site at Twin Oaks was granted in 2014 under permission 14/00891/FUL.

Parish Council Comments

- 2.2 Stisted Parish Council have submitted further comments regarding the Monks Wood proposal (COGG641) which will be discussed at a future Local Plan Sub-Committee.

Comments Received

- 2.3 No comments have been received on the village. One additional site has been submitted STIS500 – Land at DC Cottage, and has been put forward for residential use.

Officer Comment

- 2.4 No supporting or objection comments have been received for sites STIS398, 399, 400 and 401 as such the officer recommendation to not include those sites is unchanged. However Members may be aware a planning application for site STIS400 is currently awaiting determination under reference 16/01338/OUT for 4 dwellings.
- 2.5 STIS500 is remote from the village of Stisted and is located on the A120. If other sites in the area such as CRESS212 and STIS397 had been allocated as part of a wider strategic site east of Braintree, then an allocation may have been appropriate. As the larger site is not within the Draft Plan, then it would not be suitable to allocate this site.

Recommendation A - That the Inset Map for Stisted remain unchanged from that in the draft Local Plan, as shown in the Appendix.

3 Sible Hedingham

- 3.1 This report covers Inset Map 53 which pertains to Sible Hedingham. The village is classified a Key Service Village and it has a hall, primary school, doctors, grocery store, post office and 2 pubs. The village is also approximately 4.5 miles northwest of Halstead and has a good bus service to the main towns of Halstead and Braintree.
- 3.2 The Inset Map received six comments and three new sites have been submitted during the consultation period.
- 3.3 SIBH611 is located on Oxford Lane and is one of the 'plotland' plots within the field to the north west of Tanners Dairy (SIBH377). SIBH631 is a larger site which incorporates SIBH611 and is the effectively the whole extent of the field to the west of Tanners Dairy. The site is approximately 4.6 hectares. The site has been submitted alongside supporting text that is summarised below:
- The site is not within an area that is likely to flood
 - The site could be is capable of development
 - The site is within proximity to the Tanners Dairy
- 3.4 The third new site submitted was at SIBH617, which is located directly to the north of Tanners Dairy (SIBH377). The site is approximately 0.17 hectares and the owners of the site wish for it to be incorporated within the SIBH377.
- 3.5 A further two comments were made in relation SIBH377. One general comment was made by a member of the public suggesting that they consider the site to be the most logical choice for further development within the District.

3.6 The other comment was made by the owner of SIBH381 who considers their site to be more appropriate for development. The full commentary is available on the consultation portal and is summarised below:

- partially brownfield, as well as greenfield land
- not in a flood zone
- flat land, which is relatively unconstrained
- relatively close to the village centre
- only partially within a conservation area
- large enough to provide a significant number of homes, including affordable housing to meet local needs (policy LPP24 requires 30% of new homes in Sible Hedingham to be affordable, on proposals of more than 10 dwellings, which equates to 8 additional affordable homes)

3.7 In turn a comment of support was made relating to the exclusion of SIBH378. The comment in summary suggested:

- The site poor scores poorly in landscape character terms and landscape capacity terms
- The site is directly adjacent to the Conservation area and the listed church
- There would be a further strain on the local roads to the site

3.8 Further supporting information has been received during the public consultation pertaining to the non-allocated SIBH381 site. The representation in summary states:

- The landscape character concerns can be mitigated
- The scheme sought is relatively low density and could be sensitively produced in terms of design and layout
- The site is linked by a footpath to the wider network and there are some employment usages within the vicinity of the site
- The agent also questions the current spatial strategy and settlement hierarchy as well as the OAHN

3.9 Further representations have been made by the agent for SIBH522 (Land at Rippers Court). These are summarised below:

- The representation questioned the current spatial policies, housing distribution and delivery as well as the site selection process
- The agent has suggested that the site should be released for housing as it is unlikely to come forward for employment usages
- No substantive evidence has been put forward to suggest the site is required for employment usage

- 3.10 *Parish Council comments* – No Parish Council comments have been made during the public consultation period, however the Parish Council had previously commented upon the sites submitted prior to the public consultation. Their commentary has been summarised below:
- The Parish Council strongly objects to the following sites: SIBH376, SIBH 378, SIBH 379, SIBH 380, SIBH 381, SIBH 382 and SIBH 522.
 - They consider these to be outside the Village Development Boundary, within a Conservation Area and would have a harmful impact on traffic flow through the village.
 - There are no objections to SIBH377 but would prefer inclusion of a business use.
- 3.11 As SIBH611, SIBH617 and SIBH631 were submitted during the public consultation the Parish Council has been informally consulted on those new sites and their comments are as set out below;
- SHPC have considered the new sites and would just like to say that the ownership of SIBH 631 and SIBH611 is very complicated and obfuscated. They also feel that it is a very rural area and should remain so.
- 3.12 *Officers comments* – Sible Hedingham is a Key Service Village and has a good range of services and facilities. The Core Strategy has enabled the development of 227 dwellings via site allocations on brownfield sites, and these sites are progressing. The Draft Local Plan has sought to allocate SIBH377 which could accommodate a further 70 units.
- 3.13 When addressing the points expressed by SIBH377 the officers consider that the site is still appropriate for development and the brownfield nature of the site would make the site in this situation a favourable one for further development. Whilst officers acknowledge the Parish wish that the site could be used for business uses, the site has been derelict for many years and is relatively poorly located in its immediate accesses to provide for employment uses.
- 3.14 In relation to the further site submission SIBH617 it is considered to be an amendment to the larger Tanners Dairy site. With the Northern and Western Boundaries being heavily treed, this would make a logical extension to the larger site and would ensure that land was not ‘marooned’ between the proposed new residential development and the adjacent field. Officer’s recommendation is that the development boundary is amended to include the site, but it must come forward with the Tanners Dairy site to provide a single redevelopment.

- 3.15 Though it is unfortunate that the speculative land bank scheme that covers SIBH611 and SIBH631 the site is not viewed to be deliverable with so many stakeholders involved in the ownership of the site. The site is heavily constrained by the lack of appropriate access. Though the field is relatively well contained, the site includes a public footpath through the site and is within the vicinity of several historic assets. It is suggested that the site is undeliverable and should not be allocated.
- 3.16 In relation to commentary put forward in relation to SIBH381 officers are of the opinion that the offering is not positively viewed in comparison to SIBH377 contrary to the views of the agent. The brownfield nature of the site is not to the extent of SIBH377, and SIBH381's site entrance is within the Conservation Area. Given the visual importance of the site for the Conservation Area, and that growth has been accommodated elsewhere with fewer constraints, it is not proposed to allocate this site for residential development.
- 3.17 SIBH522 has had further supporting text submitted however officers are of the opinion that the Employment Land Needs Assessment that is part of the current evidence base, should be considered when looking at this site. The ELNA recommends the retention of the site for employment uses. If the site seeks to be considered for residential use, sufficient marketing and viability documentation should be presented illustrating that the site is now not viable for employment uses. It is recommended that the site is retained for employment use as per the decision on the 9th of May 2016.
- 3.18 No other sites had further representation made by owners or agents and it is suggested that they remain unallocated. Notably no comments of support were logged in favour of the unallocated sites by the general public.

Recommendation B - The Inset Map for Sible Hedingham to be amended to include SIBH617 within the existing residential site allocation, as shown in the Appendix.

4 Rivenhall and Rivenhall End

- 4.1 This report concerns developments for Inset Maps 47 Rivenhall, Inset 48 Rivenhall Airfield (Allshot's Farm) and Inset 49 Rivenhall End. These sites are located in the Parish of Rivenhall, with the exception of Rivenhall Airfield (Allshot's Farm) which is within Kelvedon civil parish. Comments regarding specific Local Plan policies for LPP 5A Former Polish Campsite are also discussed.

- 4.2 Although some comments submitted for developments at Witham are actually in Rivenhall civil parish, for example Land at Forest Road, these sites will not be covered here as the remarks were submitted to Inset 2a Witham North and will be considered within the Witham committee report.
- 4.3 For the Draft Local Plan 2016 the Council agreed to allocate two new employment areas which will expand Eastways Industrial Estate in Witham by 6.8ha. No new allocations were proposed for Rivenhall village or Rivenhall End.
- 4.4 The former polish campsite is subject to policy LPP 5A. The Essex Fire and Rescue Service headquarters at Kelvedon Park is a special employment policy area which is subject to policy LPP 2A. Comments received regarding Kelvedon Park will be discussed in a subsequent report.
- 4.5 Rivenhall
Rivenhall is a small village north east of Witham with a development boundary.
- 4.6 A total of three comments were received for Inset 47 Rivenhall, two in support and one general comment.
- Rivenhall Parish Council supports the draft Local Plan
 - RIVE 362 can support economic growth and is in a sustainable location. It is deliverable in the short to medium term and will be co-operating with adjacent landowner on access
 - A general comment was received from National Grid regarding gas pipelines which run through the Parish.
- 4.7 Rivenhall Airfield (Allshots Farm)
The former Polish Camp Site or Allshots Farm is an employment allocation in what otherwise is an isolated location in the countryside.
- 4.8 No comments were received for Inset 48 Rivenhall Airfield.
- 4.9 Three comments were received for Policy LPP 5A, all three were general and none were in support or objected.
- 4.10 Respondents stated that the name for Policy LPP 5A is confusing and it should be referred to as 'proposed Rivenhall Waste Management Plant'. As such, this site will generate significant vehicle movements on the A120 and should be linked to road infrastructure improvements.

Rivenhall End

- 4.11 Rivenhall End is a small village adjacent to the A12 with development boundary.
- 4.12 A comment in support was received from Rivenhall Parish Council who noted that two employment allocations, RIVE 362 and RIVE 363, were anticipated. The council also note that these two allocations should have regard for the A12 widening scheme.
- 4.13 No other comments were received for Inset 49 Rivenhall End.

Officer comments

- 4.14 Rivenhall Parish Council supports the draft Local Plan as it proposes no new residential allocations in the Parish.
- 4.15 Officers note that LPP 5A The Former Polish Campsite and Inset Map 48 Rivenhall Airfield may be confusing, despite referring to the same site, the names do not match and neither the proposed Integrated Waste Management Plant nor Rivenhall Airfield is at this location. To clarify, officers suggest a change to the title of this policy and Inset Map 48 to 'Allshot's Farm' which is consistent with the name on planning permissions.
- 4.16 No further changes to this policy are required.
- 4.17 Officers note the comments regarding the waste facility at Rivenhall Airfield however this is a matter for the Waste Local Plan and a planning application has already been granted for the development of this site by Essex County Council.
- 4.18 No objections were received in the consultation for any other Inset Maps and officers do not have additional matters to raise on any of the other alternative sites which were previously put forward in the villages.

Recommendation C – LPP 5A to be modified as shown below

LPP 5A: ~~Former Polish Campsite Employment Area~~ Allshot's Farm

The Former Polish Campsite at **Allshot's Farm (South of Rivenhall Airfield)** is allocated for employment use and structural landscaping. Due to this site's rural nature redevelopment will be considered appropriate subject to all the following criteria:

- Any application would be accompanied by an external lighting scheme which would need to demonstrate that the site would not cause unnecessary light pollution and would be appropriate to the rural setting of the site.
- A full landscaping scheme would be required to be included with any planning application.
- Structural landscaping is protected from development and any new proposals will provide suitable additional landscaping which minimises developments impact on the countryside.

The Allocations for Allshot's Farm are shown on Inset Map 48.

Recommendation D – The Inset Map 48 to be renamed to Allshots Farm, but no further changes made to the Inset Map as shown in the Appendix.

Recommendation E – The Inset Map for Rivenhall to remain unchanged as set out in the Appendix.

Recommendation F – The Inset Map for Rivenhall End to remain unchanged as set out in the Appendix.

5 Rayne

5.1 Rayne is located west of Braintree. The village has a number of local services including pubs, restaurants/takeaways, a primary school, local shops and business but does not have a doctor's surgery.

Parish Council Comments

5.2 The Parish Council have submitted comments on many parts of the DLP which will be addressed when those chapters are discussed. Previously the Parish Council has commented on infrastructure concerns, impact of external development on the Parish, and general support for the Local Plan.

Comments Received

5.3 5 comments have been received against the inset and alternative map for Rayne.

- Concerns have been raised over alternative site RAYN355 (Land off School Road), as it is a greenfield site used for agricultural production, is too large, would generate traffic which would impact on Rayne, impacts on the Fritchway, and that cumulative development would also have an impact on the village.

- Development to the south of Rayne as it would impact on the tranquillity of the area, increase congestion, and impact on the surrounding infrastructure and footpaths
- Support for the allocation of RAYN555 as the site abuts the development boundary, is a vacant site close to services, and the village is in close proximity to Rayne. A low density scheme is proposed which would be suitable for the location within the village.
- Comments in support of site RAYN355 as Rayne should be considered as a sustainable and suitable location for housing, due to it being well related to the village, has limited physical constraints, and provides an opportunity to provide amenity green space as well as other space needs. The DLP must allocate more sites in rural villages to ensure compliance with the NPPF.

Officer Comment

- 5.4 Whilst Rayne is close to Braintree with good transport links and some local services, a significant level of development is not considered appropriate in this location. No information has been provided to show that local services are struggling or require further support through new development to ensure their continued survival.
- 5.5 RAYN355 is a larger site located on the southern boundary off of School Road. Development of the northern part of the site is likely to have limited impact on the wider landscape as previously reported to the Committee. The sites agents have suggested a lower figure of 80 units through the consultation, which could provide additional open space for the village.
- 5.6 RAYN555 is located on the eastern boundary of Rayne and is partly within the conservation area. A low level of housing is proposed which equates to 16 dwellings per hectare. A number of listed buildings are in relatively close proximity to the site.
- 5.7 Significant development is currently proposed to take place within or close to the Parish as part of a sand/gravel extraction site, development on the western edge of Braintree and later on in the Plan period through the new Garden Community at West Braintree, as such it is not considered appropriate to allocate any further sites around Rayne village.

Recommendation G - That the Inset Map for Rayne remain unchanged from that in the draft Local Plan, as shown in the Appendix.

6 Castle Hedingham

- 6.1 This report covers Inset Map 14 which pertains to Castle Hedingham. The village is classified as an 'other village' and it has a hall, primary school, doctors, grocery store, post office and 2 pubs. The village is approximately 4.5

miles northwest of Halstead and has a good bus service to the main towns of Halstead and Braintree.

- 6.2 The Inset Map received no comments from the general public but two representations by agents in objection to the non-allocation of their client's sites.
- 6.3 The agent for CASH505 (Colne Valley Railway, Yeldham Road, Castle Hedingham) has made an objection that can be seen in full against the Inset Map on the consultation portal against LPP16 and the Inset Map. The points conveyed are summarised below:
- No comparison was made between the current proposal put forward by the agent and the extant planning permission
 - The proposed developed area of the site sits outside flood zone 2 and 3
 - The brownfield nature of the site was not conveyed correctly to the councillors
 - The proposal has been revised to include 50% less dwellings and the inclusion of some employment usages.
 - The council needs to allocate more housing for delivery within the next 5 years; this site could contribute to this
 - There is a demand for further housing within Sible Hedingham and the mixed use offering proposed would amount to sustainable development
 - The agent considers there is a discrepancy within the 5 year supply calculations and that more sites deliverable within the next 5 years are required
 - The site is within proximity of Sible Hedingham which is recognised as a Key Service Village
 - The spatial strategy is overly concentrating growth within the main towns
 - The area requires further development to allow for downsizing and first moves onto the property ladder; aiding in those who wish to remain in the village being able to do so
 - The site should be reconsidered and the plan is currently unsound
- 6.4 The agent for CASH169 Land at Nunnery Street, Proposed development of land for housing (2 dwellings) has made an objection that can be summarised as shown below:
- The representations should be considered alongside the considerations of the agent relating to Spatial Policy Considerations, Housing Distribution and Delivery, and Site Selection
 - The site is not an inappropriate backland development
 - The site would round off the village edge and is not an intrusion into open countryside

- The site cannot feasibly be used for anything else and could make a small contribution to the housing stock within the village

6.5 *Parish Council Comments:* No comments were made by the Parish Council during the public consultation however their previous commentary is summarised below:

- The Parish Council do not support any of the proposed sites
- CASH 167: Outside the village envelope; previous application rejected on appeal; abuts flood plain; development, backfield development; access difficulties
- CASH 168: In open countryside outside the village envelope; dangerous access; would create a precedent for linear development and would have a high impact on the landscape, particularly on views of the castle
- CASH 169: Outside the village envelope; backfield development, adjoining flood plain; difficult access; previous applications have been rejected
- CASH 170: Outside village envelope; access will compound existing traffic problems to neighbouring school site; development on agricultural land (59% disagreed/strongly disagreed)
- CASH 505: Outside village envelope; not suitable within flood zone/flood plain; tourist attraction and provider of local employment; area for wildlife conservation; would extend ribbon development, merging Castle Hedingham and Great Yeldham; important to safeguard the separation of the two rural communities; impact on existing landscape sensitivity and visual sensitivity
- CASH 553: community open space; children's' play park & recreation field; historically significant piece of land (location of St James' Well, medieval hospital, St James Chapel). One of only two open spaces left in the village; designated as a "visually important open space" Village Design Statement
- There is no public support for alteration/expansion of the village boundary and proposals would harm the visual/landscape character and historic significance.
- Castle Hedingham's historical significance is important in supporting the local economy. The parish has experienced significant expansion in the 20th century and has not been against more recent brown field development. The parish has been affected by a 200 house development at the Sible Hedingham boundary. The village has poor public transport, parking, traffic problems with little local employment.

6.6 Great Yeldham Parish Council also commented upon CASH505 stating that they do not support the site.

- 6.7 *Officers Comments:* Though Castle Hedingham offers some facilities and has a bus route that links to Halstead and Braintree, the village is recognised to be historically significant and that the conservation of the village and its built heritage is an important asset to the village and the District.
- 6.8 Notwithstanding this, development could be permissible where an appropriate site becomes available however it was the view of officers and councillors at the Local Plan Sub-Committee on the 9th of May 2016 that no site put forward was appropriate for the development sought.
- 6.9 In relation to the comments put forward in objection the exclusion of CASH169 though the site would debatably not be an intrusion into open countryside at this location it is considered that the site does constitute an inappropriate backland development. The access to the site is substandard and the site is currently heavily treed. The inclusion of a modern development such as the one sought would set an unfavourable precedent for backland development within the wider vicinity. The site would require a development boundary amendment that would not comply with the methodology of the boundary review and lead to an uncharacteristic jutting out of the built form in this area of the village which is predominately frontage development. The site itself is not located within flood zone 2 or 3 however the access to the site is within the flood zones. It is recommended that the site remain unallocated as per the decision of the Local Plan Sub-Committee on the 9th of May 2016.
- 6.10 When considering the supporting information put forward by the agent for CASH505 it has been suggested that the Local Plan Sub-Committee were unaware of the current status of the site. It is acknowledged that some of the site could be recognised as brownfield however the extent of the brownfield element of the site is contestable. No direct comparison was made between the current proposals and the extant planning permissions but there have been some significant changes within the planning system with the introduction of the NPPF and none of the planning applications related to the site previously have sought the level of development now being proposed. Officers are still of the opinion that the development sought would amount to an inappropriate intensification of built form in open countryside. The site is highly visible from many vantage points. There is a concern that the inclusion of the site would significantly impact upon the character of the area, and though the offering now includes some employment usages, this is open countryside and some distance from the main body of the village.
- 6.11 The Sustainability Appraisal also suggested that the site scored unfavourably in terms of flood risk and landscape sensitivity. The SA also noted the

development of the site could have a negative impact upon the historic environment.

- 6.12 It is recommended that CASH505 remain unallocated as per the decision of the Local Plan Sub-Committee on the 9th of May 2016.
- 6.13 No other sites had any further supporting statements made and no comments of support have been made by any party other than the agents regarding the allocation of CASH169 or CASH505.
- 6.14 However an amendment is proposed to the Local Plan which will remove the strip of informal recreation from the site off XX. This was part of a wider allocation on the site which was previously removed. The site is within development boundary but is not allocated for a particular use, however as this is currently the only recreation area in the village, any development of the site would need to re-provide similar or increased standard facilities elsewhere within the village.

Recommendation H - The Inset Map for Castle Hedingham be amended to remove the strip of informal recreation, as shown in the Appendix.

7 Bradwell with Pattiswick

- 7.1 Bradwell is located adjacent to the A120 between Braintree and Coggeshall. It, along with Pattiswick, is within the Coggeshall ward. 1 partly new site has been submitted in Bradwell (BRAD142 – Land east of playing field and allotment gardens, Church Lane, Bradwell).
- 7.2 Pattiswick is located north of Bradwell and the A120. It does not have a development boundary. 1 new site has been submitted in Pattiswick at Monks Wood (COGG641), however this site will be discussed at a later meeting.

Parish Council Comments

- 7.3 The following comments have been received regarding site BRAD142A.
- Removal of allotment facilities is counter to BDC and ECC aims to improve the health and wellbeing of its residents. The allotment area was extended six years ago at the request of the residents of this Parish and are highly utilised. The allotments cannot be removed without alternative land being made available by the landowner.
 - Removal of allotments and the recently established community orchard will reduce environmental initiatives within the parish. Historically, the land which now comprises the Playing Field, Allotments, Orchard and School House

garden were allotments and it is understood that there had been a Village Orchard within this area. Building on allotment and orchard land, will require residents to travel into Coggeshall or Braintree to buy vegetables, which is not sustainable.

- It is unclear from the drawing whether the current access to the playing field will remain or be removed. Removal of access to the community playing field will reduce the use of equipment, particularly after completion of the Parish Council's current project to install adult gym equipment, and is therefore counter to BDC and ECC aims to improve the health and wellbeing of its residents.
- Making access to the playing field more difficult will discourage young people, parents and others from using that facility resulting in a reduction in family health and exercise, which is contrary to government aims.
- The allotments and the playing field form an integral part to the social wellbeing of the village, with the playing field being a centre for village activities such as annual Easter Egg Hunt and Dog Show, both of which are well supported by residents and non-residents alike.
- Recent initiatives to engage and involve young people of the parish in community initiatives (such as the Village Orchard) will be set back severely by the removal of the Village Orchard. The Village Orchard should be recognised as such in the Local Plan, it is currently designated as Allotment Land. It would appear that the owners, Bradwell Estates, are now seeking for this land to be designated as building land, however the Parish Council agreed with the landowner six years ago that the Village Orchard would be recreated when the Parish Council extended the land available for allotments – at the residents' request. The Village Orchard project will be completed in January 2017 with the planting of replacement trees alongside those now established.
- Since improvements to the playing field and orchard, there have been no acts of vandalism in the village. An indication that one of the Parish Council's functions to reduce crime and disorder under the Crime and Disorder Act 1998, s.17, is successful.
- Emergency access to the playing field may be severely hampered if access is restricted by development at this location.
- If the proposed development site includes vehicular access this will have a serious effect on traffic along Church Road where visibility splay is restricted

and will be more severely restricted due to increased vehicle parking, and users of the playing field will be at risk.

- The road at this point is not wide enough for two cars to pass and is regularly used by both cyclists and pedestrians, there is no footpath. A junction from a small housing estate here would be dangerous.
- Increased traffic through Tippets Wade will create an additional safety hazard as highlighted in the Parish Plan. (See also objections to previous proposal BRAD 142, our letter dated 16th March attached, which remain relevant).
- The proposed site removes parking facilities for the residents of Fosters Cottages. As a consequence these vehicles will be forced to park on the road on what is a dangerous bend. The proposal is therefore not sustainable for this location.
- Any development within the parish will increase the amount of traffic that needs to use the junction at The Street on to the A120, which is already beyond its capacity. This junction is both unsuitable and dangerous with numerous accidents reported at this location.
- Parking generally along this stretch of Church Road is very limited and community use of the village hall will be reduced if visitors are unable to park.

7.4 Comments have also been received regarding the Monks Wood proposal (COGG641). These will be addressed at a later meeting.

Comments Received

7.5 One part new site has been submitted at Bradwell village (BRAD142A – Land at Church Road, Bradwell, residential use, 15-20 dwellings). A wider area was previously submitted under reference BRAD142. Concerns as set out in these representations and by reference to policies and the supporting paragraphs, are that the DLP does not propose enough housing to meet the needs of the District and; critically, does not consider the role and importance of enhancing and maintaining the vitality of rural settlements in the District, contrary to the National Planning Policy Framework (NPPF). It is considered that suitable sites in suitable settlements, such as the land at Church Road, Bradwell should be allocated to help meet that objective for Bradwell. The site could also provide a new area of open space accessible to the public which will benefit the existing residents of the village. The village benefits from a petrol station with an associated small convenience store, a pub and a church in terms of local amenities.

- 7.6 A comment has been received in support of site BRAD503. The site is accessible to a strategic trunk road, public transport and the development is proposed to be at a low density immediately adjoining the village, with the majority of the site providing outdoor rural leisure facilities and associated holiday accommodation and formal and informal public open space. We put forward that the proposal is not the subject of constraints that would be tantamount to a significant effect in planning terms. Neither is it subject to severe physical, environmental or policy constraints. Given the very positive housing market position of this part of Essex, and the demand for outdoor rural leisure facilities and holiday accommodation in the District, it is considered that this would provide a hub for these uses in the area. The close proximity of the site to Braintree Town makes it a very accessible location for residents of the District.

Officer Comment

- 7.7 Site BRAD142A is currently identified as allotment land and is outside the development boundary for Bradwell. It is proposed for low density of approximately 15-20 dwellings, as well as new public open space and areas of biodiversity enhancement. The proposal suggests that the existing allotments would not be lost as they would be relocated. The site appears to be accessed through the car park of the allotments and recreation area and is located very close to a bend in the road. Part of the site would take in an undeveloped area of agricultural land which appears to be in current agricultural production. As such officers have concerns about the access, loss of allotments, and the loss of grade 3 agricultural land.
- 7.8 Site BRAD503 – has been proposed for an outdoor activity area, camp activity area, the replacement of brownfield commercial uses with holiday lodges and associated office, and residential development. The proposed tourist uses could be addressed through the normal planning process as existing policies on tourist development would apply. The residential part of the scheme comprises of two areas. The first is for 17 homes on a 0.66 ha site, which is located on the southern part of the site adjacent to Old Rectory barn off Rectory Meadow. This site is not a natural extension of development in Bradwell as it is separated from the main body of the village by the large curtilage of two existing dwellings. As such an area of higher density development would be encroaching into an undeveloped area of countryside. The second area was put forward for approximately 29 homes, and is on the northern side of the site to the rear of properties on the A120. It is proposed to access this area from the A120 and that the access would be shared with the proposed holiday lodges. This part of the site is better related to built development in Bradwell, but it would not be accessed from the village and would effectively be a separate residential area. It is unlikely that an

intensification of access for residential use, directly onto the A120, would be supported by Highways England.

- 7.9 A number of issues have been raised regarding housing strategy and numbers proposed in the draft Plan which will be dealt with when LPP16 – Housing Provision and Delivery is to be discussed.
- 7.10 Other than the Monks Wood proposal no other sites have been submitted in Pattiswick. The area does not have a defined nucleus for development, and is scattered and very low density in nature. As such it should not have a development boundary identified.

Recommendation I - That the Inset Map for Bradwell remain unchanged from that in the draft Local Plan, as shown in the Appendix.

Recommendation J – That Pattiswick remain within the countryside, as set out in the Draft Local Plan.

8 LPP36 Sustainable Access for All

- 8.1 This Policy seeks to improve and increase usage of all forms of sustainable transport. The NPPF emphasises the promotion of sustainable transport for its sustainability benefits and contribution towards health objectives. This means favouring solutions which reduce greenhouse gas emissions or reduce congestion.
- 8.2 Sustainable development means that all developments should contribute towards improvements to sustainable transport for all.
- 8.3 A total of 32 comments were received on the Policy and supporting text. Of which, 7 are in support, 6 are objections, and 19 are general comments.
- 8.4 Support comments:
- The policy is admirable but will require integrated transport infrastructure.
 - Three developers expressed support and commitment to meeting the requirements of this policy.
 - The Campaign to Protect Rural England (CPRE) has expressed support for this policy but note that the provision of cycleways and footpaths should be legally enforceable.
 - Consideration for cyclists as part of the development and road design process is welcome.
- 8.5 Objection comments:

- Very careful consideration to assess the impact on the environment and pollution levels is not evident in the plan.
- The number of cars should be vastly reduced and the Council should support schemes to provide public transport and encourage cycling.
- The policy states that developments should include 'appropriate' provision for various transport modes, but does not specify what is 'appropriate'; for example, the 'promotion' of car pool schemes is included but it is not clear whether such schemes will be required.
- Facilities for charging plug-in and other ultra-low emission vehicles should only be required to make developments sustainable. Viability, scale and location should be considered, it is not practical for parking courts.
- Technology for charging units can range, developments should make provision of a suitably sited electrical spur instead of charging units.
- Reference should be made to which other documents this policy relies on and should include 'updated or superseded'.
- Reference to 'Financial contributions from development proposals will be sought, where appropriate', should also include 'where appropriate and viable.'
- The use of financial contributions are unspecific given the broad nature of the policy.
- Financial contributions for off-site parking is unjustified given that LPP37 sets out parking standards.
- This policy should include consideration for equestrians

8.6 A number of general comments did not object to the policy but suggested the below observations. A significant number of comments related to roads or rail in general:

- The scale of development is excessive and there are implications for road and rail.
- West of Braintree Garden Community does not meet the requirements of this policy.
- No significant building work should take place until an alternative A120 is completed.
- In accordance to 6.159, developments adjacent to bus stops with good bus services should be allocated.

General comments received on roads:

- The cost of congestion to the local economy should be included as evidence.
- Congestion at Galleys Corner causes users to seek alternative routes through Braintree, causing congestion elsewhere. The A131 is suffers from long queues between Thistley Green and Marks Farm.

- Bus transport is unfavoured and therefore greater use of rail should be made. Suggest that Freeport could be used where additional parking can be provided or greater use of stations between Braintree and Witham.
- The Road Haulage Association have commented to request the provision of secure lorry parking sites with WC facilities, particularly near interchanges and employment land.
- Investment needed in intelligent transport systems, proper signage, traffic light sequencing technology, as well as major investment in town centre by-pass routes. Policy should include IT upgrade to improve real time travel information.

Rail:

- A dilemma exists as not enough people use the Braintree rail link yet a passing loop is required.
- In the west of Braintree, proposed sustainable transport use could have an impact on existing historic lanes, rights of way and bridle paths.
- An assessment has not been made on the predicted number of new commuters who will commute by train to London. No details on the improvements to the rail services is evident.
- The British Horse Society request that new routes should be multi-user routes – accessible to all users.
- Clarify the last paragraph of the policy.

8.7 ECC as the statutory highway consultee have commented as follows:

- Support reference to the Local Transport Plan.
- Support reference to need for Transport Assessments and Statements.
- New housing should promote sustainable travel and transport to schools through safe walking, cycling and travel routes. Safe direct routes that encourage parents to leave the car at home will be required on all new developments.
- Although ECC is responsible for public transport, 85% of the network is operated commercially, 15% are discretion services supported by ECC.
- Walking and cycling are good for physical and mental health, active travel should be enshrined in transport policies.

8.8 3 amendments to Draft Local Plan policies have been recommend by ECC:

- Reword paragraph 6.160 to elaborate and improve the detail supporting text explaining the Essex Cycle Strategy.
- Suggest policies and incentives to support car clubs, bus vouchers, shuttle buses for employment areas.

- Public rights of way will be protected by seeking works or contribution via s278 or S.106 contributions or by planning condition.
- 8.9 NHS England has highlighted support for this policy as it is vital that NHS infrastructure is serviced by adequate public transport.
- 8.10 Network Rail have decided not to respond to Local Plan consultations but refer the Councils to the Anglia: Route Study (details on network rail website). This long term planning process covers investment in control period 6 (2019-2024) and looks ahead to 2043. However the Council continues to engage with Network Rail.
- 8.11 Highways England
- Support the Braintree Cycling Action Plan.
 - Support for the Braintree Integrated Transport Package.
 - A step change needed for Sustainable Transport, suggest policies and incentives to support car clubs, bus vouchers, shuttle buses for employment areas.
 - Support for A130/131 route based strategy including an express bus between Chelmsford and Braintree.
 - Highways England supports the strategy for West of Braintree and Marks Tey Garden Communities.
- 8.12 Uttlesford note the Interim Highways Study but further assessment is needed, including on A120 junctions and M11 J8.
- 8.13 Rayne Parish Council have added the following:
- Publication of the Essex Cycle Strategy is overdue.
 - Policy does not accommodate future increases in home delivery services or refuse and emergency services vehicles.
 - Where new provision of public transport facilities cannot be guaranteed, compensating strategies for sustainable access should be provided.
 - Residents will not give up their own vehicles.
 - There is an problem with the diversion or closure of footpaths.

Officer's Comments

- 8.14 The Council will be submitting a policy to the Secretary of State which it believes will be 'sound'. To be sound this policy should be positively prepared, justified, effective and compliant with national policy (NPPF or NPPG)
- 8.15 The purpose of this policy is to promote all forms of sustainable transport, including but not limited to bus, rail, car sharing, cycling and walking, thereby reducing the overall proportion of car use as a percentage of journeys made.

The policy is underpinned by one of the core policy requirements in the NPPF to '*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling*'.

- 8.16 The Braintree Local Plan interim highways assessment June 2016 suggests that there is significant potential to encourage a modal shift as the majority of journeys to work trips to/from/within the District are currently made by car. It is essential to alleviate the forecast impact that a significant number of car trips will need to be catered for by sustainable transport instead. It was further noted that many trips were between settlements with rail links.
- 8.17 While the level of detailed data does not meet the standard of some objectors, officers are satisfied that the evidence gathered is proportionate and enough to justify the requirements of this policy.
- 8.18 Braintree District Council in co-operation with Essex County Council will continue to lobby government for investment in strategic Sustainable Transport measures such as the Witham passing loop over the lifetime of the Local Plan.
- 8.19 Modifications to respect viability are recommended for the use of financial contributions in accordance to changes set out in this report.
- 8.20 Issues regarding sustainable transport at the garden communities will be addressed through site-specific policies for these areas, both within the shared Strategic Plan and through a site specific Area Action Plan.
- 8.21 On minor matters, an allocation was committed in the draft Local Plan for commuter parking at Freeport, therefore these objections are noted and no action is required.
- 8.22 Officers feel that the policy wording referring to 'appropriate' provision will allow the decision maker discretion to determine the provision required on a site-by-site basis and that the current wording is effective.
- 8.23 Objections on electric charging points are noted and officers feel that there is sufficient flexibility in the policy to encourage a range of measures. In response to some representations, modifications to respect viability and issues of a practical nature are recommended.
- 8.24 For off-site car parking, officers expect that additional pressure on existing public car parking particularly at popular rail stations should be mitigated as with other infrastructure. As such, off-site parking is not a substitute for parking standards but is there to encourage sustainable travel. This supports

evidence that suggests that increased rail use will decrease congestion overall. It is recommended that this policy is justified and should be retained

- 8.25 Comments regarding the provision of facilities for heavy goods vehicles and intelligent transport systems are matters for the Highways Authority. Comments are noted and will be passed onto the relevant authority.
- 8.26 Officers note submissions by Rayne Parish Council and suggest some modifications to policy point 5. No others changes are recommended by officers.
- 8.27 Officers note that Highways England and Essex County Council are broadly supportive of this policy. It was generally warmly welcomed by other statutory consultees and generally by developers, therefore officers seek to make minimal changes. Uttlesford's requests for M11 J18 will be address through future duty to co-operate meetings.
- 8.28 Following consideration of the above comments, officers have recommended the following amendments:
- Change to policy title from Sustainable Access for All to Sustainable Transport.
 - ECC's up-to-date revision to paragraph 6.160 is accepted.
 - A clarifying change to policy point 1 for cyclists.
 - Change policy point 2 to include reference to multi-user routes for public rights of way network enhancements.
 - Supplement policy point 5 to include refuse vehicles.
 - Change policy point 6 to include a caveat to consider practical and viability issues.
 - A number of evidence base documents have been added to the end of the policy.

Recommendation K: Policy LPP36 Sustainable Access for All (Sustainable Transport) to be amended in accordance to the changes shown

Sustainable Access for All Transport

6.153 The Council will ensure that development set out in this document contributes to the creation of sustainable communities, where appropriate infrastructure is provided. Infrastructure can be very large schemes such as a piece of new road, or much smaller such as a piece of play equipment or signage. Infrastructure could also include community facilities and open space which are covered in detail in other parts of the Local Plan.

6.154 *The Braintree District is a large and substantially rural District in which just over half the residents live in the three main urban centres of Braintree, Halstead and Witham, with the remainder in rural areas. As such, car ownership in the District is high, and cars are the primary means of transport for many residents. The NPPF requires that the transport system should be balanced in favour of sustainable transport modes such as buses and cycling. However it is also recognised that different policies and solutions will be necessary in different areas.*

6.155 *There are particular stretches of roads or junctions in the District that can become congested, especially at peak times when people are travelling to and from school or work and we are working on solutions to this congestion, including new roads or changes to junction arrangements as appropriate. Traffic growth can also occur when new homes or offices are built in neighbouring Districts, and Councils must work together to minimise these impacts on all communities. Transport and congestion can have a negative impact on air quality and this will need to be carefully monitored and managed. Encouraging alternative approaches to private vehicle travel such as electric cars and facilitating the infrastructure required to support them, such as charging points, may assist in reducing harmful emissions which can impact on health.*

6.156 *Essex County Council is responsible for roads and public transport in the District, whilst Highways England is responsible for the major routes of the A120 and A12. Braintree District Council has a good relationship with these organisations and will need to continue to work in partnership with them and our neighbouring authorities to deliver the required projects. Major schemes for road improvement in Braintree District and the wider region have been set out in the strategic section. The timing of the provision of infrastructure will be set out in master plans, legal agreements or planning obligations.*

6.157 *Public transport networks in the town are adequate during the day on weekdays but during the evening and in rural areas the availability of public transport can be limited. With an aging population in the District, we need to ensure that public transport is accessible and available to all, providing access to key facilities. Fragmented cycleway networks are also available in mainly Witham and Braintree.*

6.158 *Walking and cycling are a sustainable method of travel, in particular for short journeys, although also becoming increasingly popular for longer commutes in some areas. As well as the benefits in terms of reduced congestion and pollution, they provide health and wellbeing benefits for the participant and should be encouraged wherever feasible, across the District.*

6.159 *In order to promote the most sustainable forms of transport, the spatial strategy in this Local Plan proposes to allocate development in locations where it can be well served by existing public transport networks (including rail) and where services may be in close proximity to facilitate*

walking and cycling. Development will be planned to have to appropriate day to day facilities within it, to reduce the need to travel.

6.160 ~~Essex County Council is currently producing a Cycle Way Strategy for Braintree District which will provide the most up to date advice on the improvements that are required to the network.~~ **The approved Essex Cycling Strategy recommended that Cycling Actions Plans are prepared for each district. These will consider the current level of cycle demand, how cycling levels can be increased; cycle safety issues, gaps in the existing cycle provision, particularly relating to key routes; how any gaps can be closed through enhancements, better connectivity to recreation, key employment areas, development zones and schools; and ways of marketing existing and proposed cycle routes.**

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

6.162 Cycle parking will also be expected to be provided at homes and also at destination points such as work places, train stations and the town centre. The amount of cycle parking required is set out in the Essex County Council vehicle parking standards, as adopted. This document also includes guidance on layout and positioning of the parking.

LPP 36: Sustainable Access for All Transport

Sustainable modes of transport should be facilitated through new developments to promote accessibility and integration into the wider community and existing networks.

Priority should be given to cycle and pedestrian movements and access to public transport. Development proposals should provide appropriate provision for all the following transport modes:-

1. Cyclists, through safe design and layout of routes integrated into the new development and **contributing towards the development and enhancement of** the wider cycle network and provision of secure cycle parking and where appropriate, changing and shower

facilities

2. Pedestrians (including disabled persons and those with impaired mobility), through safe, accessible, direct and convenient design and layout of routes within the new development and wider pedestrian network. Safeguarding existing Public Rights of Way and promoting enhancements to the network, where appropriate, to offer **multi-user routes for** walking, cycling and **other recreational** opportunities.
3. Public transport, through measures that will improve and support public transport and provide new public transport routes
4. Community transport, through measures that will promote car pools, car sharing and voluntary community buses, community services and cycle schemes
5. Servicing, **refuse** and emergency vehicles.
6. Facilities for charging plug-in and other ultra-low emission vehicles **where viable and practical.**

Development will be required to be consistent with and contribute to the implementation of the 'Essex Transport Strategy' Local Transport Plan for Essex.

Developers ~~may~~ **will** be required to produce Travel Plans as considered appropriate by the Local Planning Authority. The Essex County Council Transportation Development Management Policies provides further detail on requirements relating to accessibility and access including Transport Assessment and Statement thresholds for each land use category.

Transport Assessments and Statements will be required in accordance with Essex County Council's Development Management Policies, in order to assess the impact of development in terms of highway safety and capacity for both access to the proposed development and the wider highway network.

Financial contributions from development proposals will be sought, where appropriate **and viable**, towards achieving the above objectives including the construction of new or improvement of existing **off-site** cycleway and footpaths, and additional off-site **public** car parking, if required.

Development which would adversely affect the character of, or result in loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to rights of way for pedestrian, cyclist or horse rider use.

Improvements to such rights will be sought in association with new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites.

9 LPP37 Parking Provision

- 9.1 This policy updates Replacement Local Plan Policy 56 which provides a guide to developers regarding car parking and visitor spaces on new developments. Braintree District Council has adopted and used the Essex Vehicle Parking Standards 2009 as a consistent guide for a number of years. This policy accepts all the policies within the Parking Standards and adds no additional local standards to the guidance. ECC will update the guidance in future and it will be at the discretion of the Council to adopt the new standards.
- 9.2 Six consultation comments in total were received regarding this policy, one objected to the policy while the remainder were general comments.
- 9.3 No comments were submitted in support.
- 9.4 The sole objector disagreed with the parking courts element of the Vehicle Parking Standards. They said parking courts are not sufficient in helping parking problems because most people want the convenience of parking outside their front door – leading to on-street parking.
- 9.5 General comments
- Two comments were related to paragraph 6.167 and cited the proposed Garden Communities. It was stated that parking provision standards in the West of Braintree Garden Community would generate unsustainable levels of traffic and subsequently impact on local rural roads.
 - One general comment stated that the policy should meet parking needs for North Essex which has an average of 2 cars per family.

- A developer has stated that they support the policy however the Council must use a flexible approach to the layout of parking to ensure the developments are efficient and deliverable.
- Concern was also expressed that financial contributions will be sought for additional off-site parking however it is not part of this policy but is part of policy LPP36 Sustainable Access for All.

9.6 Statutory Comments

- The County Council are requesting a modification to make all efforts to ensure that external car-parking are built with permeable materials to allow increased infiltration and minimise run-off rates.

9.7 Officers have considered the all comments received and have the following responses to make:

- The Essex Vehicle Parking Standards recognise that parking courts can be poorly located and designed making them unattractive and insecure. Thus, a detailed set of design guidelines are included in the Parking Standards to ensure that courts are overlooked and have direct access to dwellings to encourage their use. If these guidelines are followed at planning application stage, a high quality of design should be delivered. For this reason officers do not consider that modifications are required.
- In response to the general comments, officers consider that the standards are appropriate for the average parking needs of North Essex. The parking standards state that for dwellings of two or more bedrooms, a minimum of 2 spaces are required and for one bedroom dwellings, one space is required. Secure cycle storage is required for all new dwellings to encourage sustainable transport use. The provision of parking at garden communities will be considered elsewhere in the Local Plan and site specific Area Action Plan.
- Officers recommend that the suggested modification by the Lead Local Flood Authority (ECC) to encourage permeable surfaces is accepted and the suggested changes are incorporated into the supporting text.

9.8 Officers have retained a number of allocations for public parking areas on the Proposal Map. These allocations have a policy hook in the second paragraph of LPP37 to guide their development. A modification to the supporting text in this policy is sought to identify the locations of these sites on the proposals map. If further car parking allocations are made during the consideration of responses to the Draft Local Plan, these will be added to this policy.

Recommendation L LPP 37 Parking Provision to amended as shown.

Parking Provision

6.167 *The geography of the District is predominantly rural and therefore people travel substantial distances to reach some of the main service centres, often by private vehicle. Car parking, therefore, will always be a key issue for the towns and villages in the District.*

6.168 *As well as the main shopping areas and town centres, the main parking requirements are related to the train stations, particularly those on the mainline to London but to a lesser extent those stations on the branch line between Witham and Braintree. Due to the quick frequent service from mainline stations, commuters are attracted in from the wider area. It is important that residents have good access to rail stations as this can ensure there is the opportunity to travel longer distances by train.*

6.169 *Parking on new developments, both commercial and residential, is covered in the Essex County Council Vehicle Parking Standards. This sets out the amount of car parking and visitor spaces that are required for new developments, the size of bays and suggestions of layouts. Developments are expected to meet the requirements of this document in all cases. **Developments with new external car parking areas should make all efforts to ensure that they are permeable to minimise run off rates.***

6.170 *Parking courts in existing residential areas are protected for that use where they are considered to be critical to local parking provision. Parking courts are **occasionally** put forward for residential development, but where the courts are critical for local parking needs they will be protected for that use.*

6.171 *The provision of additional off-street car parking provision, either through improvements to existing car parks or the provision of new car parks, will be supported in appropriate locations.*

LPP 38: Parking Provision

Development will be required to provide vehicular and cycle parking in accordance with the adopted Essex County Council's adopted Vehicle Parking Standards.

Existing car parks serving the main town centres, retail, and leisure facilities and train stations and some residential car parking areas, which are seen as critical for off-street parking provision, are allocated on the Proposals Maps, and will be protected for this use.

- (a) Station Car Park, Braintree**
- (b) Station Approach, Braintree**
- (c) Freeport South**
- (d) Freeport Retail Park**

- (e) **Freeport North**
- (f) **Station Car Park, Bures**
- (g) **Station Forecourt, Hatfield Peverel**
- (h) **Station Car Park, Hatfield Peverel**
- (i) **Station Car Park, Kelvedon**
- (j) **Rear of Village Hall, Little Yeldham**
- (k) **Albert Road, Witham**
- (l) **Station Car Park, Witham**
- (m) **Station Car Park Extension, Witham**

Proposals for alternative uses will only be acceptable where it can be shown to the satisfaction of the local planning authority that these car parking spaces are being re-provided in an equal or better position to serve that the main use.

The following is allocated for commuter parking.

- (n) **Freeport West**

10 LPP38 Protected Lanes

- 10.1 Conserving the historic environment is a key element of sustainable development in the NPPF. This starts with identifying and assessing the significance of assets of historical value. The Braintree District Protected Lanes Assessments 2013, which updates a previous study, provides the relevant evidence base for this policy. Historic lanes in Essex have had policies in place to protect them for more than 25 years and this Local Plan policy aims to rollover the Replacement Local Plan policy.
- 10.2 There are 103 Protected Lanes in the District, by preserving assets which contribute to historic character, this policy aims to support the Local Plan objectives of conserving the traditional landscape and character of the District.
- 10.3 This policy received 2 replies, both of which supported the protected lanes policy.
- English Heritage, a statutory consultee, has welcomed the policy on protected lanes.
 - The other comment in support noted that Pod's lane in Rayne is a protected lane and should not be designated as an access route for West of Braintree Garden Community.
- 10.4 A clarifying amendment is recommended by officers to change 'adversely affected' to 'have material impact on'. This makes the policy more specific,

clearer to the reader and therefore more effective.

- 10.5 This policy is supported by the statutory consultee and experts at Historic England, therefore other than a clarifying amendment above, officers have no other recommendations to make.

Recommendation M: LPP 38 Protected Lanes to amended as shown

Protected Lanes

6.174 There are a number of lanes within the District, which have been identified as having a particular historic and landscape value for the character of the countryside. An assessment of Protected Lanes in the District has been produced and is available in the evidence base for the Local Plan. This document reviews the original Protected Lanes work and updates the evidence on whether they are suitable for protection. It also included an assessment of a number of additional lanes, which were put forward for consideration as protected lanes.

6.175 Protected Lanes are often enclosed by a mix of deciduous hedges and raised verges that can be indications of great age. The Council will seek to protect and influence others to protect the features of a Protected Lane including their verges. Material increases in traffic using a protected lane due to development proposals will not be permitted.

LPP 38: Protected Lanes

The District Council will seek to conserve the traditional landscape and nature conservation character of roads designated on the Proposals Map as Protected Lanes, including their verges, banks, ditches and natural features such as hedgerows and other structural elements contributing to the historic features of the lanes.

Any proposals that would ~~adversely affect~~ **have a materially adverse impact on** the physical appearance of these Protected Lanes or generate traffic of a type or amount inappropriate for the traditional landscape and nature conservation character of a protected lane, will not be permitted.