

East of England Plan > 2031 – Consultation on Scenarios for Housing and Economic Growth

Agenda item 6

Portfolio Area: Enterprise and Culture
Report Presented by: Cllr. Nigel Harley

Background Papers: East of England Plan > 2031 Scenarios for Housing and Economic Growth - September 2009
Report to LDF Panel 18.11.09
Submission to EERA 24.11.09

Corporate Implications: Please refer to table at end of main report

Options:

1. To endorse the response to the consultation set out in Appendix 1 to this report
2. To agree an additional or alternative response

Risks: The main risk is that the Council's views are not reflected at the next stages of the review of the Plan

Executive Summary

EERA is currently carrying out a review of the East of England Plan and has published a consultation document on scenarios for housing and economic growth. The review of the Plan will provide the context for the growth of the District for the next 20 years. The consultation sets out 4 scenarios for growth of the region based on different assumptions. For Braintree District the levels of housing growth range from 330 dwellings per year to 950 per year.

It is considered that the Council's response to EERA should be that Scenario 1 should be that preferred option but that there be flexibility in the distribution of housing growth to enable a higher rate of development where it would lead to the direct provision of key infrastructure.

Decision

To endorse the comments set out in paragraphs 15 to 17 of this report as the basis of this Council's response to the consultation.

East of England Plan > 2031 – Consultation on Scenarios for Housing and Economic Growth

Background

1. The East of England Regional Assembly (EERA) has carried out a consultation on scenarios for housing and economic growth for the period to 2031 as the first stage of the preparation of a review of the East of England Plan. The existing plan was approved by Government in May 2008 and covers the period to 2021. The review of the Plan will cover the period to 2031. The closing date for responses was 24th November 2009. It was not therefore possible for the Panel's views to be endorsed by Council before the deadline. EERA has indicated however that provided a response was made by their deadline they can accept the formally agreed response after then provided that any changes to it are clearly indicated.
2. The East of England Plan sets out the long-term planning strategy for the region, which includes targets for new homes in each local authority area and targets for jobs for each sub-area. The consultation covers the period 2011 to 2031 and sets out 4 scenarios for the numbers of new homes which could be built in the region. Dwelling totals for individual local authority areas are set out for each scenario.
3. The main consultation document was accompanied by an Integrated Sustainability Appraisal and Sub-Area profiles, including one for the Heart of Essex, which includes Braintree, Brentwood, Chelmsford and Maldon Districts. The consultation documents can be viewed on EERA's website at www.eera.gov.uk. The consultation growth scenarios are supported by a number of background studies and advice from the National Planning and Housing Advice Unit (NHPAU).

Housing Growth Scenarios

4. The consultation document put forward 4 scenarios for housing growth for the period 2011 to 2021 as follows:
 1. Roll forward of existing plan
 2. National Housing Advice (low) and Regional New Settlements
 3. National Housing Advice and Regional Economic Forecasts
 4. National Household Projections

The housing numbers for Essex and adjoining Districts are set out in Appendix 1. The scenarios and relevant housing numbers for Braintree District are set out below.

Scenario 1 – Roll Forward of Existing East of England Plan

5. This scenario is a roll forward of the current dwellings target for each local authority area as set out in the existing East of England Plan 2001 to 2021 and extends this forward at the same housing delivery rate to 2031. This scenario gives a regional total of 521,120 new dwellings at a rate of 26,060 per year. Greater Essex (the administrative area of Essex County Council plus Southend-on-Sea and Thurrock Unitary Authorities) receive 26% of the regions total. The rate proposed for Braintree District under this scenario is 330 dwellings per year, a total of 6,560 for the plan period.

Scenario 2 – National Housing Advice and Regional New Settlements

6. This scenario is based on increasing growth at specific locations in the region based upon NHPAU (low) advice and the findings of the Regional Scale Settlement Study commissioned by EERA as part of the evidence base for the review of the Plan. The provision for Braintree

District under this scenario is 530 dwellings per year. Under this scenario both Chelmsford and Uttlesford Districts are identified for significant levels of growth. The provision for Chelmsford is 1,700 dwellings per annum with a total of 34,000 for the plan period and for Uttlesford 1,080 dwellings per year or 21,600 in total. The consultation document states that the figure for Uttlesford includes a new settlement south of the A120 and west of Braintree and goes on to say that this could alternatively be located in Braintree District. This scenario also includes very significant levels of growth at Chelmsford based on the findings of the Regional Scale Settlement Study. In discussing this the study states “the most obvious growth location therefore would be along the A12/Great Eastern rail corridor to the north-east of Chelmsford, utilising land within Braintree District.” Therefore under Scenario 2 Braintree District could be in receipt of 3 elements of growth: the growth associated with the District itself, a potential new settlement of about 20,000 new homes south of the A120 and growth associated with Chelmsford in the A12 corridor.

Scenario 3 - National Housing Advice and Economic Forecasts

7. Under this scenario the influential factor is the economic potential to create more jobs. Extra growth over scenario 1 has been allocated to those areas where there is forecast to be a demand for additional workers. The provision for Braintree District under this scenario is 480 dwellings per year with a total of 9,640 dwellings for the period 2011 to 2031.

Scenario 4 – National Household Projections

8. This scenario is based on the latest national set of population and household projections (2006 based) for the period up to 2031. These forecasts are trend based and therefore distribute growth to those areas which have experienced the greatest rates of growth over the last ten years and takes no account of policy interventions. Under this scenario Districts such as Braintree which have experienced rapid growth receive a high provision whereas other Districts, such as Harlow, where growth is planned but has not yet taken place receive a low provision. Under this scenario the provision for Braintree District is 950 dwellings per year with a total of 19,000 dwellings for the period 2011 to 2031.

Comment

9. In order to assist members in considering the impact of each scenario officers have assessed the additional growth that would be required over and above that currently being provided for in the Draft Core Strategy of the Braintree District Local Development Framework. The Draft Core Strategy is based on the approved East of England Plan and provides for the provision of 273 dwellings per year for the period 2009 to 2026, a total of 4,637 dwellings for the 17-year period. The total requirement in addition to this for each scenario is as follows:

Scenario 1 – 2,520 dwellings

Scenario 2 – 6,520 dwellings (excluding any provision associated with Uttlesford or Chelmsford)

Scenario 3 – 5,520 dwellings

Scenario 4 – 14,920 dwellings

10. In order to assist with the assessment of the implications of these levels of growth possible sources of housing supply have been examined. Five possible options have been identified. These are put forward for illustrative purposes only. Any decisions on future growth locations would need to be made as part of a review of the Core Strategy once the Review of the East of England Plan has been finalised. The possible sources of supply are:

Option 1 – Previously developed land

This could include sites that are currently protected for employment but which are unused or underused and sites in existing employment use

Option 2 - Growth Locations on the edge of Braintree and Witham

This could include locations that were put forward but not selected for the Draft Core Strategy

Option 3 – Growth on edge of Halstead and Key Service Villages

Option 4 – Dispersal of growth to villages

Option 5 - New Settlements

Two locations for new settlements have been put forward to EERA in the context of the RSS review. These are Boxted Wood and Andrewsfield (separate proposals in the same general location) to the west of Braintree which are also partly in Uttlesford District and West of Marks Tey which is partly in Colchester Borough.

11. In terms of achievability officers view is as follows:

Scenario 1 - this is not large enough for a new settlement but could be achieved by a choice of options 1 to 4 above or a mixture of these.

Scenarios 2 and 3 - both would require a new settlement as major growth around Braintree and Witham is constrained by the capacity of trunk road junctions.

Scenario 4 – this level of growth is not considered to be achievable even with one or two new settlements. It would require an annual delivery rate of 950 dwellings per year throughout the plan period. Since 2001 the highest level achieved in Braintree District was 854 dwellings in 2003-4 at the height of the housing boom. It is not considered that there would be a demand for this level of growth or sufficient employment provision to provide jobs for these new residents.

12. The ability to accommodate growth will also depend on the provision of supporting infrastructure. The strategic infrastructure improvements that are required in this District include the A120 between Braintree and Marks Tey, the A12 and Braintree branch line improvements. New growth locations and new settlements have high infrastructure costs for their own developments as services (water, sewerage, electricity and gas), roads within the development, primary school, open space and community facilities. Additional contributions to off-site major road or rail infrastructure could therefore be fairly limited. It should be noted however that the promoters of the new settlement West of Marks Tey are proposing to deliver part of the A120 improvements.

13. At the members' seminar on the RSS Review held on 27th October a number of issues and concerns were raised by members about the consultation and the growth scenarios including:

- The need to provide supporting infrastructure and to address the current deficit. Delivery of infrastructure has been patchy
- Concerns that growth will not achieve carbon reduction and will lead to increased traffic and energy consumption
- Loss of countryside and agricultural land
- The uncertainty around the provision of employment and the balance between housing and jobs growth and the impact of the current recession
- Provision of water supply to support growth

- Concerns about the robustness of forecasts and the evidence base used by EERA
- Need to take into account the growth of neighbouring Districts and the impact it may have on the District
- Need for the Council to have a clear view of the growth that it wants to see in the District and to stay in control.

14. Discussions have also taken place with Essex County Council and other District Councils in Essex and following those discussions a joint response on behalf of Essex Local Authorities has been agreed by Cabinet Members. This is included in Appendix 1.

Conclusion

15. The current consultation by EERA provides an opportunity for the Council to determine its own view about the future growth of the District. In terms of the scenarios put forward by EERA the following conclusions can be drawn:

Option 1

This is the most deliverable of the options with a requirement of 330 dwellings per year overall which could be achieved by an extension of the existing strategy. However this strategy would require infrastructure improvements to address both the existing deficit and to support new development growth. The work currently being carried out on the Core Strategy indicates that further growth in Braintree and Witham is constrained by the capacity of the A120 and A12 and the junctions on those roads.

Option 2

This option is likely to require the provision of a new settlement. Furthermore the consultation document is unclear as to the implications of growth at Chelmsford and in Uttlesford on this District.

Option 3

This option is likely to require the provision of a new settlement in this District.

Option 4

This is not considered to be deliverable.

16. Whilst the level of growth put forward under Scenario 1 is the most deliverable there may be a case for a higher level of growth in the District if this secures and delivers key strategic infrastructure improvements. However this is only likely to be achieved in connection with the provision of a new settlement. It is considered that Scenario 2 can not be supported because of the scale of growth overall and its lack of clarity on how the growth associated with Chelmsford would be dealt with and the location of a new settlement between Dunmow and Braintree. Although Scenario 3 is based on economic forecasting it is not clear what the economic justification is for the growth suggested for Braintree District and how this will address the current imbalance between homes and jobs. Scenario 4 is not considered to be deliverable.

17. The Local Development Framework Panel agreed that the Council's response to the consultation should support the overall levels of growth for the region as set out in Scenario 1, but should suggest that there may be scope to vary the distribution between Districts where a higher level of growth would secure and deliver the provision of key strategic infrastructure

improvements. The submission made by Braintree District Council in November – subject to endorsement by Council – was based upon the comments of the LDF Panel; the Members seminar in October, and the Essex Local Authorities’ joint response. The details of the submitted response are set out in Appendix 1, together with the Essex Local Authorities’ joint response.

Corporate Implications				
Financial:	None			
Legal:	When approved the review of the Regional Plan will form part of the Development Plan. It will be necessary to review the Council’s local development framework to take account of the updated Plan.			
Equalities & Diversity:	None			
Customer Impact:	The Plan will determine levels of growth in the District for the period to 2031 and will directly or indirectly affect all people living and working in the District			
Environment & Climate Change:	The Plan will be subject to an environmental impact assessment that will assess its impacts on the environment and climate change			
Consultation/Community Engagement:	Local Committees		Partners	✓
	Public		Staff	
Key Decision:	No			
Public/Private Report:	Public			
Officer Contact:	Paul Munson			
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TABLE 1
EERA GROWTH SCENARIOS – NEW HOUSING GROWTH IN GREATER ESSEX 2011-2031

Area:	EERA GROWTH SCENARIOS FOR PUBLIC CONSULTATION (FOR THE 2011-2031 PERIOD):							
	SCENARIO 1 RSS Continuation:		SCENARIO 2 NHPAU Low (RSSS Distribution)		SCENARIO 3 NHPAU Low (Economically Moderated)		SCENARIO 4 2006-Based Household Projections Distribution	
	Annual New Homes:	Total New Homes	Annual New Homes:	Total New Homes	Annual New Homes:	Total New Homes	Annual New Homes:	Total New Homes
Basildon	630	12,600	630	12,600	630	12,600	750	15,000
Castle Point	200	4,000	200	4,000	200	4,000	300	6,000
Rochford	250	5,000	250	5,000	250	5,000	400	8,000
Southend	300	6,080	300	6,080	560	11,140	700	14,000
Thurrock	950	19,000	950	19,000	950	19,000	800	16,000
Essex Thames Gateway:	2,330	46,680	2,330	46,680	2,590	51,740	2,950	59,000
Colchester	840	16,800	1,050	21,000	840	16,800	1,700	34,000
Tendring	430	8,600	510	10,200	650	12,960	1,200	24,000
Essex Haven Gateway:	1,270	25,400	1,560	31,200	1,490	29,760	2,900	58,000
Braintree	330	6,560	530	10,560	480	9,640	950	19,000
Brentwood	170	3,440	170	3,440	220	4,300	350	7,000
Chelmsford	830	16,600	1,700	34,000	830	16,600	850	17,000
Maldon	110	2,280	110	2,280	240	4,740	350	7,000
Heart of Essex:	1,440	28,880	2,510	50,280	1,770	35,280	2,500	50,000
Epping Forest	160	3,200	160	3,200	390	7,760	550	11,000
Harlow	1,010	20,200	1,010	20,200	1,010	20,200	200	4,000
Uttlesford	430	8,600	1,080	21,600	430	8,600	350	7,000
West Essex/ M11 Corridor	1,600	32,000	2,250	45,000	1,830	36,560	1,100	22,000
GREATER ESSEX:	6,640	132,960	8,650	173,160	7,680	153,340	9,450	189,000

Key: The Districts where the proposed new housing 2011-2031 exceeds a continuation of the existing RSS housing delivery trajectory in Scenario 1.

Key: The Districts where the proposed new housing 2011-2031 undershoots a continuation of the existing RSS housing delivery trajectory in Scenario 1.

Appendix 1

Braintree District Council submission to EERA consultation, 24 November 2009

(includes also the Essex Local Authorities' joint response)

[East of England Plan > 2031 Scenarios for housing and economic growth](#)

Question 1: Do you think we've chosen the right growth scenarios to consider? If not, what other scenario(s) should we consider and why? No

What other scenario(s) should we consider and why?

The formulation of the growth scenarios is too narrowly focused upon "housing numbers" to the exclusion of other important planning considerations that should have been considered. The approach should be to determine what strategy is right for the region, and then determine the housing figures to support that strategy, but the approach being taken appears to work in reverse, considering how housing figures could be accommodated and then creating a strategy from that.

The two major concerns for Braintree District Council are the balance between employment and housing, and the achievement of the necessary infrastructure improvements.

Other scenarios that could reasonably have been considered for the purposes of public consultation include scenarios based upon:

- The long term capacity of the region's transport, community and other infrastructure to accommodate further growth, and
- Providing for significant carbon reduction within the region, with a different approach to development patterns and transport and movement.

Question 2: Do you have any comments on the four growth scenarios? (please tick all that apply)

- Scenario 1
- Scenario 2
- Scenario 3
- Scenario 4

Please enter your comments specific to Scenario 1

It is possible that the current recession will be deeper and longer lasting than assumed in the scenarios. In addition to the impact on the deliverability of the housing numbers per se, and the challenge of delivering employment growth; suggested cutbacks in future public expenditure may threaten the potential to achieve the necessary infrastructure investment.

The growth scenarios are focussed almost exclusively on "housing numbers" in terms of new homes to be provided 2011-2031, expressed for whole administrative areas.

There is no adequate explanation of how the proposed housing growth will affect key settlements in terms of the scale, location, type and phasing of development. This is a particular problem where major strategic growth could straddle administrative boundaries surrounding KCDCs (for example Chelmsford and Colchester).

There is a lack of key information about material planning considerations other than housing numbers; in particular in relation to

- the ability of the local economy to provide appropriate employment to support an increase in new homes and resident labour supply;

- housing-employment alignment and the implications for local economies, commuting patterns, unemployment and regeneration initiatives;
- the impact upon transport networks in terms of capacity, congestion and service levels, and
- the relationship between strategic growth locations and their infrastructure capacity, and whether supporting infrastructure could be provided to support further growth in a timely way.

The Council's comments in respect of the implications for Braintree District are as follows:

Option 1 is the most deliverable of the options, with a requirement that could be achieved for Braintree District by an extension of the existing strategy. However this strategy would require infrastructure improvements to address both the existing deficit and to support new development growth. The work currently being carried out on the Core Strategy of the Braintree District Local Development Framework indicates that further growth in Braintree and Witham is constrained by the capacity of the A120 and A12 and the junctions on those roads.

Please enter your comments specific to Scenario 2

The higher growth proposed under Scenarios 2, 3 and 4 rely heavily upon the findings of the Regional Scale Settlement Study, but that study is seriously flawed as it does not provide a sound and adequate evidence base, technical analysis or policy justification to support its growth proposals. There have been and continue to be significant constraints on improving the strategic transport infrastructure in the Braintree/Chelmsford/Colchester area, including the Great Eastern rail line, the A120, the A12 and the Chelmsford north east by-pass (A130). The work currently being carried out on the Core Strategy of the Braintree District Local Development Framework indicates that further growth in Braintree and Witham is constrained by the capacity of the A120 and A12 and the junctions on those roads.

The Regional Scale Settlement Study refers to the potential for part of Chelmsford's growth to be accommodated in Braintree district; it is unclear from the consultation whether Scenario 2 has been formulated on this basis, and the policy position is unclear and confusing.

Option 2 is likely to require the provision of a new settlement. Furthermore the consultation document is unclear as to the implications of growth associated with Chelmsford and Uttlesford on this District. The consultation suggests the creation of new settlements in some districts but is vague about where these would be located, their scale and their form in relation to existing settlements; notably in relation to Braintree/Uttlesford, Chelmsford and/or Braintree.

In the case of Braintree, Chelmsford, and Colchester the distinction between urban extensions and new free standing settlements is particularly unclear.

Additional comments from Braintree District Council in respect of Scenario 2:

It is possible that the current recession will be deeper and longer lasting than assumed in the scenarios. In addition to the impact on the deliverability of the housing numbers per se, and the challenge of delivering employment growth; suggested cutbacks in future public expenditure may threaten the potential to achieve the necessary infrastructure investment.

The growth scenarios are focussed almost exclusively on "housing numbers" in terms of new homes to be provided 2011-2031, expressed for whole administrative areas.

There is no adequate explanation of how the proposed housing growth will affect key settlements in terms of the scale, location, type and phasing of development. This is a particular problem where major strategic growth could straddle administrative boundaries surrounding KCDCs (for example Chelmsford and Colchester).

There is a lack of key information about material planning considerations other than housing numbers; in particular in relation to

- the ability of the local economy to provide appropriate employment to support an increase in new homes and resident labour supply;

- housing-employment alignment and the implications for local economies, commuting patterns, unemployment and regeneration initiatives;
- the impact upon transport networks in terms of capacity, congestion and service levels, and
- the relationship between strategic growth locations and their infrastructure capacity, and whether supporting infrastructure could be provided to support further growth in a timely way.

Please enter your comments specific to Scenario 3

The higher growth proposed under Scenario 3 relies heavily upon the findings of the Regional Scale Settlement Study, but that study is seriously flawed as it does not provide a sound and adequate evidence base, technical analysis or policy justification to support its growth proposals. There have been and continue to be significant constraints on improving the strategic transport infrastructure in the Braintree/Chelmsford/Colchester area, including the Great Eastern rail line, the A120, the A12 and the Chelmsford north east by-pass (A130). The work currently being carried out on the Core Strategy of the Braintree District Local Development Framework indicates that further growth in Braintree and Witham is constrained by the capacity of the A120 and A12 and the junctions on those roads.

The consultation document is unclear as to the implications of growth associated with Chelmsford and Uttlesford on this District. The consultation suggests the creation of new settlements in some districts but is vague about where these would be located, their scale and their form in relation to existing settlements; notably in relation to Braintree/Uttlesford, Chelmsford and/or Braintree.

In the case of Braintree, Chelmsford, and Colchester the distinction between urban extensions and new free standing settlements is particularly unclear.

Option 3 is likely to require the provision of a new settlement.

Additional comments from Braintree District Council in respect of Scenario 3:

It is possible that the current recession will be deeper and longer lasting than assumed in the scenarios. In addition to the impact on the deliverability of the housing numbers per se, and the challenge of delivering employment growth; suggested cutbacks in future public expenditure may threaten the potential to achieve the necessary infrastructure investment.

The growth scenarios are focussed almost exclusively on "housing numbers" in terms of new homes to be provided 2011-2031, expressed for whole administrative areas.

There is no adequate explanation of how the proposed housing growth will affect key settlements in terms of the scale, location, type and phasing of development. This is a particular problem where major strategic growth could straddle administrative boundaries surrounding KCDCs (for example Chelmsford and Colchester).

There is a lack of key information about material planning considerations other than housing numbers; in particular in relation to

- the ability of the local economy to provide appropriate employment to support an increase in new homes and resident labour supply;
- housing-employment alignment and the implications for local economies, commuting patterns, unemployment and regeneration initiatives;
- the impact upon transport networks in terms of capacity, congestion and service levels, and
- the relationship between strategic growth locations and their infrastructure capacity, and whether supporting infrastructure could be provided to support further growth in a timely way.

Please enter your comments specific to scenario 4

Scenario 4 cannot be supported because of the scale of growth overall and its lack of clarity on how the growth associated with Chelmsford would be dealt with and the location of a new settlement between Great Dunmow and Braintree.

Moreover, Scenario 4 is not considered to be deliverable.

The higher growth proposed under Scenario 4 relies heavily upon the findings of the Regional Scale Settlement Study, but that study is seriously flawed as it does not provide a sound and adequate evidence base, technical analysis or policy justification to support its growth proposals. There have been and continue to be significant constraints on improving the strategic transport infrastructure in the Braintree/Chelmsford/Colchester area, including the Great Eastern rail line, the A120, the A12 and the Chelmsford north east by-pass (A130). The work currently being carried out on the Core Strategy of the Braintree District Local Development Framework indicates that further growth in Braintree and Witham is constrained by the capacity of the A120 and A12 and the junctions on those roads.

The consultation document is unclear as to the implications of growth associated with Chelmsford and Uttlesford on this District. The consultation suggests the creation of new settlements in some districts but is vague about where these would be located, their scale and their form in relation to existing settlements; notably in relation to Braintree/Uttlesford, Chelmsford and/or Braintree. In the case of Braintree, Chelmsford, and Colchester the distinction between urban extensions and new free standing settlements is particularly unclear.

The EiP Panel which examined the existing Plan concluded that job growth in Braintree District had been unable to match housing growth in past years, and it was unlikely to do so in the future. The jobs density for the district is relatively low compared to many parts of the region, and the district already has some of the longest average travel to work distances in the region. This is in conflict with sustainability and carbon reduction initiatives. The level of housing growth proposed in Scenarios 4 would exacerbate these problems.

There is a lack of a robust and credible evidence base to support the higher scales of housing growth set out in Scenarios 4; there is a lack of technical information provided, and the justification for major growth proposals at particular locations is inadequately supported by the evidence base.

Additional comments from Braintree District Council in respect of Scenario 4:

It is possible that the current recession will be deeper and longer lasting than assumed in the scenarios. In addition to the impact on the deliverability of the housing numbers per se, and the challenge of delivering employment growth; suggested cutbacks in future public expenditure may threaten the potential to achieve the necessary infrastructure investment.

The growth scenarios are focussed almost exclusively on "housing numbers" in terms of new homes to be provided 2011-2031, expressed for whole administrative areas.

There is no adequate explanation of how the proposed housing growth will affect key settlements in terms of the scale, location, type and phasing of development. This is a particular problem where major strategic growth could straddle administrative boundaries surrounding KCDCs (for example Chelmsford and Colchester).

There is a lack of key information about material planning considerations other than housing numbers; in particular in relation to

- the ability of the local economy to provide appropriate employment to support an increase in new homes and resident labour supply;
- housing-employment alignment and the implications for local economies, commuting patterns, unemployment and regeneration initiatives;
- the impact upon transport networks in terms of capacity, congestion and service levels, and
- the relationship between strategic growth locations and their infrastructure capacity, and whether supporting infrastructure could be provided to support further growth in a timely way.

Question 3: What is your preferred growth scenario and why?

Scenario 1

Please tell us why you prefer Scenario 1

Braintree District Council supports the overall levels of growth for the region set out in Scenario 1 but suggests that there may be scope to vary the distribution between Districts where a higher level of growth would secure and deliver the provision of key strategic infrastructure improvements.

It is possible that the current recession will be deeper and longer lasting than assumed in the scenarios. In addition to the impact on the deliverability of the housing numbers per se, and the challenge of delivering employment growth; suggested cutbacks in future public expenditure may threaten the potential to achieve the necessary infrastructure investment.

The growth scenarios are focussed almost exclusively on "housing numbers" in terms of new homes to be provided 2011-2031, expressed for whole administrative areas.

There is no adequate explanation of how the proposed housing growth will affect key settlements in terms of the scale, location, type and phasing of development. This is a particular problem where major strategic growth could straddle administrative boundaries surrounding KCDCs (for example Chelmsford and Colchester).

There is a lack of key information about material planning considerations other than housing numbers; in particular in relation to

- the ability of the local economy to provide appropriate employment to support an increase in new homes and resident labour supply;
- housing-employment alignment and the implications for local economies, commuting patterns, unemployment and regeneration initiatives;
- the impact upon transport networks in terms of capacity, congestion and service levels, and
- the relationship between strategic growth locations and their infrastructure capacity, and whether supporting infrastructure could be provided to support further growth in a timely way.

The Council's comments in respect of the implications for Braintree District are as follows:

Option 1 is the most deliverable of the options, with a requirement that could be achieved for Braintree District by an extension of the existing strategy. However this strategy would require infrastructure improvements to address both the existing deficit and to support new development growth. The work currently being carried out on the Core Strategy of the Braintree District Local Development Framework indicates that further growth in Braintree and Witham is constrained by the capacity of the A120 and A12 and the junctions on those roads.

The higher growth proposed under Scenarios 2, 3 and 4 rely heavily upon the findings of the Regional Scale Settlement Study, but that study is seriously flawed as it does not provide a sound and adequate evidence base, technical analysis or policy justification to support its growth proposals. There have been and continue to be significant constraints on improving the strategic transport infrastructure in the Braintree/Chelmsford/Colchester area, including the Great Eastern rail line, the A120, the A12 and the Chelmsford north east by-pass (A130).

The Regional Scale Settlement Study refers to the potential for part of Chelmsford's growth to be accommodated in Braintree district; it is unclear from the consultation whether Scenario 2 has been formulated on this basis, and the policy position is unclear and confusing.

Option 2 is likely to require the provision of a new settlement. Furthermore the consultation document is unclear as to the implications of growth associated with Chelmsford and Uttlesford on this District. The consultation suggests the creation of new settlements in some districts but is vague about where these would be located, their scale and their form in relation to existing settlements; notably in relation to Braintree/Uttlesford, Chelmsford and/or Braintree.

In the case of Braintree, Chelmsford, and Colchester the distinction between urban extensions and new free standing settlements is particularly unclear.

Option 3 is likely to require the provision of a new settlement. The comments in relation to new settlements under Option 2 apply also to Option 3.

Option 4 is not considered to be deliverable. The comments in relation to new settlements under Option 2 apply also to Option 4. Option 4 is based largely upon an extrapolation of recent past trends, according to which Braintree District experienced a particularly high rate of growth linked to high levels of in-migration, and in conflict with the distribution of growth planned under the East of England Plan. Moreover, past trends do not necessarily provide a good guide to future market demand trends; the uncertain economic climate is likely to reduce market demand for new housing over the next decade as reduce people's willingness to move home and relocate; in-migration was a key driver of housing market in the District. It is noted that the reduction in market demand, as evidenced in housing supply, has been particularly marked in Braintree District over the past year.

Whilst the level of growth put forward under Scenario 1 is the most deliverable there may be a case for a higher level of growth in Braintree District if this secures and delivers key strategic infrastructure improvements. However, this is only likely to be achieved in connection with the provision of a new settlement. It is considered that Scenario 2 cannot be supported because of the scale of growth overall and its lack of clarity on how the growth associated with Chelmsford would be dealt with and the location

of a new settlement between Great Dunmow and Braintree. Although Scenario 3 is based on economic forecasting it is not clear what the economic justification is for the growth suggested for Braintree District and how this will address the current imbalance between homes and jobs. Scenario 4 is not considered to be deliverable.

The EiP Panel which examined the existing Plan concluded that job growth in Braintree District had been unable to match housing growth in past years, and it was unlikely to do so in the future. The jobs density for the district is relatively low compared to many parts of the region, and the district already has some of the longest average travel to work distances in the region. This is in conflict with sustainability and carbon reduction initiatives. The level of housing growth proposed in Scenarios 2, 3 and 4 would exacerbate these problems.

There is a lack of a robust and credible evidence base to support the higher scales of housing growth set out in Scenarios 2, 3 and 4; there is a lack of technical information provided, and the justification for major growth proposals at particular locations is inadequately supported by the evidence base.

**Question 4: Do you agree we have covered all the regional impacts of the four scenarios that have been identified? If not, what else should we have addressed? No
What further impacts should have been considered?**

The consultation should have considered infrastructure provision within the region to support long term growth.

Question 5: Do you agree that the vision and objectives of the current Plan remain suitable for the revised Plan. If not, what changes would you make and why? Yes

Question 6: Do you have any evidence to suggest that policies other than those identified need to be updated or created? Yes

Please detail evidence and list which other policies you think need to be reviewed or created

The Gypsy and traveller policy; it should be explained that arrangements will be made to review policies H3 and H4 after 2011.

Supplementary Question 7: Do you have any comments on the sub-area profiles?

These are largely factual statements and do not add much to the debate.

Supplementary Question 8: Do you have any comments on the Integrated Sustainability Appraisal. Is there any further information that should be taken into account?

There is a serious lack of technical information to inform the ISA.

Please add comments that you feel you are unable to make in reply to the questions in Section 6. For example, a comment on a particular paragraph.

In addition to the response submitted, Braintree District Council broadly supports the submission made in the Joint Essex Local Authorities response, as set out below.

East of England Plan > 2031: Scenarios for Housing & Economic Growth, Consultation
ESSEX LOCAL AUTHORITIES' JOINT RESPONSE

Preamble

1. Local authorities in Greater Essex welcome the opportunity to comment upon the EERA consultation document.
2. The response set out below represents the combined views of Essex County Council, Southend-on-Sea Borough Council, Thurrock Council, and the twelve District Councils in Essex.
3. The twelve Districts are Basildon District Council, Braintree District Council, Brentwood Borough Council, Castle Point Borough Council, Chelmsford Borough Council, Colchester Borough Council, Epping Forest District Council, Harlow Council, Maldon District Council, Rochford District Council, Tendring District Council, and Uttlesford District Council.
4. Although the individual local authorities above will be submitting their own consultation responses to EERA setting out their views by the closing date of the 24 November 2009, they have also collectively agreed that a combined response should also be submitted. This covers several matters upon which there is a unanimous view between all local authorities in Greater Essex.
5. This combined response is set out below.

Combined Response to the RSS Review

6. There is continuing concern about the economic and social impact of the current housing shortage on communities in Greater Essex including access to a decent home, at a house price or rent that local people can afford, and for first time buyers, key workers, and people in housing need. Government and their agencies, and regional partners, must fully support local authorities in addressing this issue.
7. In particular, there is major disappointment about the continued failure of national and regional government to provide the necessary infrastructure and funding to support new housing and employment growth in Greater Essex proposed by the current approved East of England Plan up to 2021 (let alone the RSS review). The delivery of the housing and job targets in the existing Plan is proving extremely challenging.
8. The impact of the severe UK economic recession suggests that it is going to be delivery factors based around the capacity of the housing market and the construction industry, future job creation, and infrastructure provision which will have a major influence on the future housing trajectory for new homes in the region up to 2021 and beyond.
9. For the whole of Greater Essex as a geographic area, the constituent local authorities express a clear preference that scenario 1 is the maximum scale of growth that should be considered in the RSS review. Whilst there may be a preference for scenario 1, even this level of growth is unlikely to be achieved given the capacity of infrastructure, the state of the local economy and the impact on the environment.
10. The higher scales of new housing growth proposed for Greater Essex overall in scenarios 2, 3 and 4 of the EERA Consultation Document are considered to be unrealistic, unsustainable, and not capable of delivery. This is evident in the lack of a robust and credible evidence base to support these scenarios. They cannot be supported.
11. Within this overall position for Greater Essex (paragraphs 9 and 10 refer), individual local authorities will express their own preference for the long-term scale of growth which they consider appropriate for their respective administrative areas.
12. Finally, there is some significant concern that the EERA Consultation Document and its related public consultation process have not been 'fit for purpose'. This relates to the way in which the growth scenarios are presented, the lack of technical information provided, and the inadequacy of the evidence base in justifying major growth proposals at particular locations.