

**Braintree District Council**

**‘One District – One Vision’**

**A Draft Strategy for People and Places in the Braintree  
District to 2025 (October 2008)**

**Sustainability Appraisal**

**and**

**Strategic Environmental Assessment**





# CONTENTS

<b>1. EXECUTIVE SUMMARY</b> .....	<b>1</b>
INTRODUCTION .....	1
CORE STRATEGY AND SUSTAINABLE COMMUNITY STRATEGY.....	1
THE PURPOSE OF THIS REPORT .....	2
SUSTAINABILITY APPRAISAL OBJECTIVES .....	2
SUMMARY OF APPRAISAL OF POLICIES.....	3
<b>2. INTRODUCTION</b> .....	<b>5</b>
BACKGROUND .....	5
THE AIM AND STRUCTURE OF THIS REPORT.....	5
<b>3. BACKGROUND TO ‘ONE DISTRICT – ONE VISION’</b> .....	<b>9</b>
THE CORE STRATEGY .....	9
THE SUSTAINABLE COMMUNITY STRATEGY .....	9
THE CONSULTATION DOCUMENT .....	9
<b>4. SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT</b> .....	<b>11</b>
STRATEGIC ENVIRONMENTAL ASSESSMENT .....	11
SUSTAINABILITY APPRAISAL .....	11
<b>5. METHODOLOGY</b> .....	<b>13</b>
PREPARATION OF A SCOPING REPORT (STAGE A) .....	13
APPRAISAL OF THE DOCUMENT (STAGE B).....	14
PREPARATION OF THE REPORT (STAGE C).....	15
<b>6. APPRAISAL OF POLICIES</b> .....	<b>17</b>
INTRODUCTION .....	17
POLICY CS1 – PROMOTING ACCESSIBILITY FOR ALL .....	17
POLICY CS2 – THE NATURAL ENVIRONMENT .....	18
POLICY CS3 – THE BUILT ENVIRONMENT.....	19
POLICY CS4 – THE DEVELOPMENT OF THE ECONOMY OF THE BRAINTREE DISTRICT .....	19
POLICY CS5 – DISTRIBUTION OF EMPLOYMENT.....	20
POLICY CS6 – THE RURAL ECONOMY .....	21
POLICY CS7 – TOWN CENTRES AND REGENERATION .....	22
POLICY CS8 – HOUSING PROVISION AND DELIVERY .....	23
POLICY CS9 – SERVICES AND FACILITIES .....	25
SUMMARY OF APPRAISAL OF POLICIES.....	26
<b>7. APPRAISAL OF INDIVIDUAL LOCATIONS</b> .....	<b>29</b>
INTRODUCTION .....	29
MIXED USE: LAND TO THE NORTH-WEST OF BRAINTREE – OFF PANFIELD LANE .....	29
MIXED USE: LAND TO THE SOUTH-WEST OF WITHAM – OFF HATFIELD ROAD .....	31
MIXED USE: LAND TO THE NORTH-EAST OF WITHAM – OFF FOREST ROAD IN THE PARISH OF RIVENHALL .....	32
SINGLE USE: BRAINTREE – LAND TO THE WEST OF THE A131 AT GREAT NOTLEY .....	33
SINGLE USE: WITHAM – LAND TO THE NORTH-EAST OFF EASTWAYS (WITHIN RIVENHALL) .....	34
<b>8. SIGNIFICANT EFFECTS</b> .....	<b>35</b>
<b>9. CONCLUSIONS</b> .....	<b>37</b>



# 1. EXECUTIVE SUMMARY

## Introduction

This is the Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) for the 'One District – One Vision' Draft Strategy for People and Places in the Braintree District to 2025 (October 2008) hereafter referred to as 'the consultation document'. The consultation document fulfils the requirement to produce both a Sustainable Community Strategy and the Core Strategy for Braintree District and presents the consultation stage of each which together will form an integrated strategy. The Core Strategy provision will form part of Braintree District Council's Local Development Framework and will be adopted as a Development Plan Document. Consequently there is a requirement for the document to be subject to Sustainability Appraisal and Strategic Environmental Assessment.

The SA/SEA of the consultation document has been produced by the Spatial Planning Group of Essex County Council acting as consultants to Braintree District Council. The content of the report should not be interpreted or otherwise represented as the formal view of Essex County Council.

## Core Strategy and Sustainable Community Strategy

Braintree District Council together with the Braintree District Local Strategic Partnership has a duty to assess community priorities and produce a 'Sustainable Community Strategy' (SCS). In addition, Braintree District Council, as local planning authority has a duty to prepare a 'Local Development Framework' (LDF).

Braintree District Council has decided to produce a combined Sustainable Community Strategy and Core Strategy entitled 'One District – One Vision' for the purpose of consultation.

Braintree District Council published a Consultation document in October 2008. The options seek views on:

- Community Priorities (the social, economic and environmental priorities for people and communities in the District to 2025);
- Growth Locations (locations where housing, employment and other types of development could take place within the district to 2025); and
- Core Planning Policies (that set out the policies which will underpin the development within the District).

Sustainability Appraisal is mandatory under the Planning and Compulsory Purchase Act 2004 (as amended) for the production of LDF Development Plan Documents (DPDs). There is a requirement for local planning authorities when producing these documents to consider the wider social, environmental and economic effects; and how implementation of proposals set out by the documents may impact on existing and future conditions.

There is also a requirement under European Directive 2001/42/EC to undertake a Strategic Environmental Assessment of LDF DPDs. Whilst the requirements to produce a Sustainability Appraisal and Strategic Environmental Assessment are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach.

## **The purpose of this report**

This document sets out the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) that has been undertaken for the Consultation document. This report highlights the key matters arising from the SA/SEA.

The purpose of undertaking the SA/SEA at this stage of the process is to identify potential significant sustainability effects arising from the content of the Consultation document. The outcome of this stage of the Appraisal is designed to assist the plan preparation process and, with the responses to the consultation, to inform the plan preparation of future stages of the Core Strategy DPD. The DPD will be subject to additional appraisal before adoption, to take account of proposals and amendments that may arise from the consultation and this SA/SEA.

## **Sustainability Appraisal Objectives**

Fifteen sustainability objectives were identified to appraise the Consultation document as follows:

1. Create Safe Environments which do not undermine the quality of life or community cohesion
2. To provide everyone with the opportunity to live in a decent home
3. To improve the health of the Districts residents and mitigate/reduce potential health inequalities.
4. To promote town centre vitality and viability
5. To achieve sustainable levels of prosperity and economic growth
6. To conserve and enhance the biological and geological diversity of the environment
7. To promote more sustainable transport choices.
8. Promote accessibility.
9. To improve the education and skills of the population
10. To maintain and enhance cultural heritage and assets within Braintree District
11. To reduce contributions to climatic change
12. To improve water quality
13. To reduce the risk of flooding
14. To improve air quality
15. To maintain and enhance the quality of landscapes and townscapes.

## Summary of Appraisal of Policies

The key points arising from the appraisal of each question are shown in Table 1.

**TABLE 1: SUMMARY OF APPRAISAL OF POLICIES**

Proposed Policy	Summary of Appraisal
CS1 – Promoting Accessibility for All	The proposed policy supports sustainability objectives relating to transport and environmental protection. However the mechanisms for delivery and implementation of the strategy would benefit from further elaboration.
CS2 – The Natural Environment	The policy addresses the protection of the natural environment, and supports sustainability objectives especially with regard to quality of life, biodiversity and landscape. The policy could be enhanced to incorporate minimisation of flood risk, surface water run-off and the incorporation of sustainable drainage systems. The extent to which there are impacts on the management of the natural environment will also depend on the detail of other DPDs that should be subject to separate SA/ SEA.
CS3 – The Built Environment	The proposed policy positively addresses sustainability objectives. However there is no reference to flood risk, and management of surface water run-off. Furthermore the policy as worded lacks specificity to Braintree District Council which could be addressed as the policy is refined through the plan preparation process.
CS4 – The Development of the Economy of the Braintree District	Reference to CS2 supports economic development within the proposed environmental framework in so far as policy CS2 meets sustainability objectives. The policy could benefit in sustainability terms through reference to sustainable transport measures.
CS5 – Distribution of Employment	The Council needs to be satisfied that the employment land provision will be adequate for the plan period. Individual sites proposed would need to be subject to separate sustainability appraisals.
CS6 – The Rural Economy	The proposed policy supports economic sustainability objectives but potentially conflicts with environmental objectives, especially those which are related to the use of private motor vehicles. The policy would benefit from a strategy to deal with the potential relocation of operations which increase in scale to more sustainable locations. Similarly attention should be paid to the cumulative impact of small developments.
CS7 – Town Centres and Regeneration	The strategy proposed locates regeneration and development in the most sustainable locations. Separate assessment of the proposed sites for regeneration and development would be required.
CS8 – Housing Provision and Delivery	The policy broadly accords with the sustainability objectives especially with regard to quality of life, however the sustainability of specific allocations will require separate appraisal. Reference to the use of previously developed land and development being within the settlement boundaries would help to clarify the policy wording with regard to location. With regard to design the policy would benefit in sustainability terms through the inclusion of reference to energy efficiency and sustainable drainage systems.
CS9 – Services and Facilities	The proposed approach accords well with the sustainability objectives. However, further assessment of individual sites would be required to ensure that at the site specific level, the policy delivers sustainability objectives.

Furthermore, the review of the document has identified some points for consideration during the next stage of document preparation as follows:

- As currently phrased, many of the proposed policies could apply to any area, and lack Braintree District specificity. Consideration should be given to how the policies can be worded to relate to the local policy needs of Braintree.
- The document does not set out the proposed settlement distribution for the District.
- The housing and employment provision policies would benefit from reference to the provision of infrastructure necessary to support development with an indication of timing and funding.
- The document does not set out the proposed phasing for development within the district or the timing of necessary infrastructure to support development of phases.
- The consultation document does not set out a policy that identifies a hierarchy of town and retail centres in the district or provide guidance on the future role, development or accessibility of such sites.
- Overall the document would benefit from clear guidance on flood risk in the District and a firm commitment to sustainable drainage systems. Similarly a commitment to energy efficiency and sustainable construction methods throughout development would assist sustainability objectives.
- Clarification will be required as to the proposed monitoring framework and identification of indicators and targets for the delivery of the policies within the Core Strategy.

Location specific appraisals were undertaken for the following:

- Land to the North West of Braintree (Off Panfield Lane); identified as a location for mixed use development including 500 dwellings and 15 hectares of employment land. Key issues identified included the interaction between the mix of proposed uses, infrastructure requirements for the development, phasing of the delivery of different uses, and flexibility in their delivery.
- Land to the South West of Witham (Off Hatfield Road); identified as a location for mixed use development including 600 dwellings and community facilities including local shops. Key issues identified included accessibility and the A12 Junction.
- Land to the North East of Witham (Off Forest Road in the Parish of Rivenhall); identified as a location for mixed use development including 300 dwellings and community facilities and open space. Key issues included accessibility and boundary treatment.
- Braintree (Land to the West of the A131 at Great Notley); identified as a location for a business park for B1 and B2 Uses. Key issues included accessibility and boundary treatment.
- Witham, Land to the North East off Eastways (within Rivenhall); identified as a location for 6 hectares of employment land. Key issues identified included infrastructure requirements, the relationship with the existing development and boundary treatment.

Appraisals will be required for any further development locations which are identified through the preparation of the Core Strategy.

## **2. INTRODUCTION**

### **Background**

Braintree is a large, mainly rural District that covers an area of 612 square kilometres. It covers a large area of mid and north Essex, and stretches from the A12 in the south to the Suffolk border in the north. The northern part of the District is largely rural; the central part of the District is part of the A120 corridor and the southern part of the District is in the A12 corridor and functions as part of mid-Essex. The population of the District in mid-2007 was 140,900; just over half of the population live in the three main towns of Braintree (Population approximately 43,000), Witham (population approximately 23,000) and Halstead (population approximately 11,000).

Braintree District Council is currently preparing plans that will guide the future development of the District to 2021 and beyond. Proposals for the development and use of land will be set out in the Local Development Framework (LDF) and proposals relating to social and community issues will be set out in the Sustainable Community Strategy (SCS). In July 2006 Essex County Council was commissioned by Braintree District Council to undertake a Sustainability Appraisal, incorporating the requirements of the Strategic Environmental Assessment Directive, for Braintree's Core Strategy and Community Strategy.

During 2006 the District Council sought views on issues of importance and aspirations for the future of the District together with views on the future development of the area. The Braintree 2025 Issues and Options Document, published in 2007, built on that work by setting out a series of options for the future of the District. The District Council has now followed this by publishing a 'Sustainable Community Strategy and Core Strategy' document, entitled 'One District – One Vision; A Strategy for People and Places in the Braintree District to 2025' (and hereafter called "the Strategy"). Each of the previous stages of the process has been subject to a SA/SEA, and the District Council has identified that this should also be done for the current stage.

The requirement for a SA/SEA emanates from high level international and national commitment to sustainable development. The purpose of this SA/SEA is to promote sustainable development by informing the strategy-making process on the better integration of sustainability considerations into the strategies for the future of Braintree District.

### **The aim and structure of this report**

A combined Sustainability Assessment /Strategic Environmental Assessment (SA / SEA) has been undertaken on the 'One District – One Vision' Options Consultation to assess and predict the economic, social and environmental effects that are likely to arise from its implementation. This is in accordance with the Planning and Compulsory Purchase Act 2004, the SEA Directive 2001/42/EC and Government guidance. The SA/SEA has been produced by the Spatial Planning Group of Essex County Council acting as consultants to Braintree District Council. The content of the report should not be interpreted or otherwise represented as the formal view of Essex County Council.

This report sets out the SA/SEA that has been undertaken for the consultation document. It highlights the key matters arising from the appraisal. Table 2 signposts the relevant sections of this report that represent the required content of an Environmental Report as

outlined within the SEA Directive. The purpose of undertaking the SA/SEA at this stage of the process is to identify potential significant sustainability effects arising from the content of the consultation document.

The outcome of this stage of the SA/SEA is designed to assist the plan preparation process and, with the responses to the consultation, will inform future stages of the Sustainable Community Strategy and Core Strategy. The document will be subject to additional appraisal before adoption, to take account of proposals and amendments that may arise from the consultation and this appraisal.

**TABLE 2: THE ENVIRONMENTAL REPORT REQUIREMENTS**

<b>SEA Regulations – required content of Environmental Report</b>	<b>Where covered in this Report</b>
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.	The whole report does this.
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 3
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	See Section 2, 6 and 7
The environmental characteristics of areas likely to be significantly effected;	Sections 6, 7 and 8
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	See Sections 6, 7, 8 and 9
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programmes and the way those objectives and any environmental considerations have been taken into account during its preparation;	See Sections 6, 7, 8 and 9
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	See Sections 6, 7, 8 and 9
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	See Sections 6, 7, 8 and 9
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 5
A description of measures envisaged concerning monitoring in accordance with Article 10;	Sections 6, 7 and 8
A non-technical summary of the information provided under the above headings.	Section 1
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2).	The whole report does this.

This section provides an introduction to the combined Sustainable Community Strategy and Core Strategy and related SA / SEA. The rest of the report is structured as follows:

- **Section 3** – provides an outline of the contents, main objectives of the ‘One District – One Vision’ document, and the relationship with other relevant plans and programmes;
- **Section 4** – describes the Sustainability Appraisal and Strategic Environmental Assessment process and legislative requirements.
- **Section 5** – sets out the methodology
- **Section 6** – sets out the appraisal of the proposed policies;
- **Section 7** – sets out the appraisal of the location specific options;
- **Section 8** – sets out the significant effects; and
- **Section 9** – outlines the conclusions.



### **3. BACKGROUND TO ‘ONE DISTRICT – ONE VISION’**

#### **The Core Strategy**

The Planning and Compulsory Purchase Act (2004) introduced changes to the planning system to promote a proactive and positive approach to managing development. A fundamental element of the new system is the production of a Local Development Framework (LDF) to set out local planning strategy and policies for each local planning authority. LDF's comprise Local Development Documents (LDD's), which include Development Plan Documents, that are part of the statutory development plan, and Supplementary Planning Documents (SPD's), which expand on policies, set out in a development plan document or provide additional detail.

The LDF covers the development of the District and is made up of a number of documents which deal with different aspects of the planning system and which have to go through a formal adoption process. The Core Strategy Development Plan Document is a key component of the LDF. The purpose of the Core Strategy is to set out the key elements of the planning framework for the area. It should comprise a spatial vision and strategic objectives for the area; a spatial strategy and core policies to achieve that vision; and a monitoring and implementation framework with clear objectives for achieving delivery. It should also set out broad locations for delivering the housing and other strategic development needs such as employment, retail, leisure, community, essential public services and transport development. The time horizon of the Core Strategy should be for a period of at least 10 years from the date of adoption. The Core Strategy Development Plan Document (DPD) will describe in broad detail the proposals for growth locations and the core planning policies for Braintree District when approved.

#### **The Sustainable Community Strategy**

Under the Local Government Act 2000, each authority also has a duty to prepare a Community Strategy. Good practice guidance advocates collaborative working to link the preparation of the Community Strategy and the LDF Core Strategy from both a policy content and process perspective. The LDF Core Strategy should provide an integrated approach to the implementation of the spatial aspects of the Community Strategy and other strategies by taking account of their principles and characteristics, and their implications for the development and use of land.

#### **The Consultation Document**

In the current ‘One District – One Vision’ document Braintree District Council has combined the current stages in preparation of the Community Strategy and the Core Strategy into a single document for the purposes of public consultation. At a future stage it is expected that the two strategies will be formally considered in separate documents as they move towards approval and formal adoption through different procedures.

Braintree District Council has already undertaken two previous rounds of consultation to inform preparation of the Community Strategy and the Core Strategy. First, in 2006, a consultation was held on a questionnaire designed to invite comment on the range of potential options and policies to be included in the Strategy. This was followed in 2007 by consultation on an Issues and Options Document representing the second consultation

stage in the process. The Document looked at the overall vision for the future of the District and different strategic options, followed by options for a number of specific topic areas.

The current consultation on the 'One District – One Vision' document is the next stage of the process. Braintree District Council published the latest consultation document in October 2008. The document seeks views on the following which are set out within the document:

- Community Priorities (the social, economic and environmental priorities for people and communities in the District to 2025);
- Growth Locations (locations where housing, employment and other types of development could take place within the district to 2025); and
- Core Planning Policies (that set out the policies which will underpin the development within the District).

Further separate documents produced within the Local Development Framework will identify specific sites for development and detailed policies for planning decisions.

The Core Strategy is statutorily required to be subject to a formal sustainability appraisal, incorporating strategic environmental assessment in accordance with European Union Directive 2001/42/EC. The purpose of sustainability appraisal is to appraise the social, economic and environmental effects of the strategies and policies being proposed in policy documents contributing to the local development framework, to ensure that decisions accord with sustainable development principles.

It is not necessary for each stage in preparation of the Core Strategy to be subject to sustainability appraisal. However, it is regarded as best practice for sustainability appraisal to be an integral part of each iterative stage in preparation of the Core Strategy. This allows the sustainability of the Core Strategy to be tested and for policies and proposals to be refined at each subsequent stage in the process.

## 4. SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT

The requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

*'...development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'*

### Strategic Environmental Assessment

The European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the 'SEA Directive') was adopted in June 2001 with a view to increase the level of protection for the environment, integrate environmental considerations into the preparation and adoption of plans and programmes and to promote sustainable development.

The Directive was transposed into English legislation by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulation'), which came into force on 21 July 2004. It requires a Strategic Environmental Assessment to be carried out for all plans and programmes "*which are subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions*". The few exceptions are detailed in Article 3 (8, 9) of the SEA Directive. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic, material assets including architectural and archaeological heritage, landscape and the interrelationship between the above factors" (Annex 1(f)).

### Sustainability Appraisal

Sustainability Appraisals examine the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. They are mandatory for all Development Plan Documents and Regional Spatial Strategies in accordance with S.19 (5) Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008; and in accordance with the policy provisions of PPS12 with regard to Development Plan Documents.

Whilst the requirements to produce a Sustainability Appraisal and Strategic Environmental Assessment are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met.



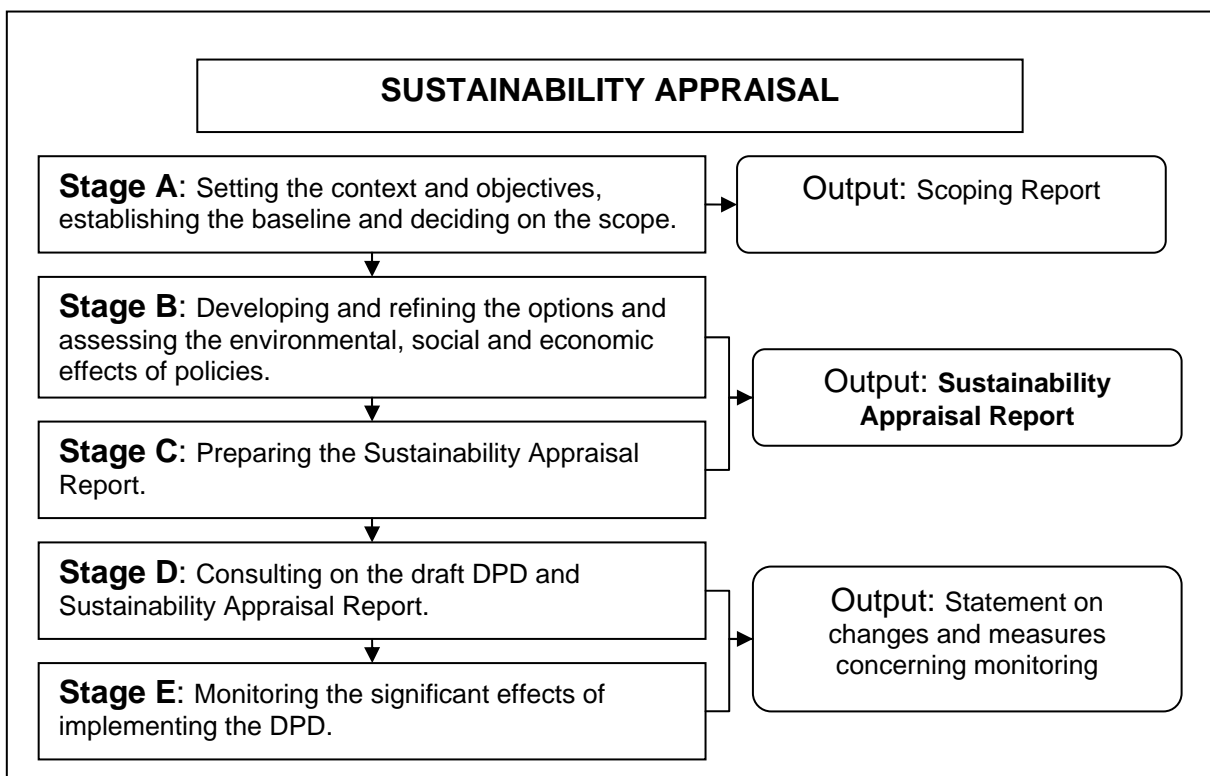
## 5. METHODOLOGY

This report of the Sustainability Appraisal, incorporating Strategic Environmental Assessment, has been prepared in accordance with guidance set out in:

- A Practical Guide to the Strategic Environmental Assessment Directive, ODPM, 2005; and,
- Sustainability Appraisal (SA) of Regional Spatial Strategies and Local Development Frameworks, ODPM, 2005

The appraisal of the Consultation document has been conducted in accordance with the guidance as part of a five stage process.

**FIGURE 1: STAGES OF SUSTAINABILITY APPRAISAL**



This document therefore reports on Stages A, B and C of the SA/SEA process outlined in detail below.

### Preparation of a Scoping Report (Stage A)

Stage A culminated in the preparation of a Scoping Report which identified relevant plans, programmes and environmental protection objectives; baseline information; and sustainability objectives; to be used during the appraisal. The relevant aspects of the current state of the environment are outlined in Braintree District Council's Strategic Environmental Baseline Information Profile 2008-2009.

Fifteen sustainability objectives were identified to appraise the consultation document. The sustainability objectives are listed in Table 2, with an indication of their contribution to social, economic and environmental factors.

**TABLE 2: THE SUSTAINABILITY OBJECTIVES**

<b>Sustainability Objectives</b>	<b>Economic</b>	<b>Social</b>	<b>Environment</b>
1) Create Safe Environments which do not undermine the quality of life or community cohesion		✓	✓
2) To provide everyone with the opportunity to live in a decent home	✓	✓	✓
3) To improve the health of the Districts residents and mitigate/reduce potential health inequalities.	✓	✓	
4) To promote town centre vitality and viability	✓	✓	
5) To achieve sustainable levels of prosperity and economic growth	✓	✓	
6) To conserve and enhance the biological and geological diversity of the environment		✓	✓
7) To promote more sustainable transport choices.	✓	✓	✓
8) Promote accessibility.	✓	✓	✓
9) To improve the education and skills of the population	✓	✓	
10) To maintain and enhance cultural heritage and assets within Braintree District		✓	✓
11) To reduce contributions to climatic change		✓	✓
12) To improve water quality			✓
13) To reduce the risk of flooding	✓	✓	✓
14) To improve air quality	✓	✓	✓
15) To maintain and enhance the quality of landscapes and townscapes	✓	✓	✓

The Scoping Report was subject to a five week consultation with the three statutory consultees:

- the Environment Agency,
- Natural England, and
- English Heritage.

Responses received from the consultees have been incorporated into the appraisal.

### **Appraisal of the Document (Stage B)**

The key task in this stage is to undertake an individual appraisal of each policy in the document subject to appraisal by appraising them against the sustainability objectives originally set out in the Scoping Report. The outcomes are then analysed to assess the degree to which they give rise to significant, cumulative and/or synergistic effects. As necessary, in response to adverse effects, the appraisal develops and refines options to identify possible mitigation measures. Appropriate recommendations are made to inform subsequent stages in plan preparation.

The nature of the 'One District – One Vision' document is that of a combined Core Strategy planning document and a Community Strategy. The SA/SEA process is only required for those parts of the document that relate to a planning document in accordance with 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (ODPM, November 2005).

As a result of this, the Sustainability Appraisal Team within Essex County Council's Spatial Planning Group have identified policies and other details from the 'One District – One Vision' document and the accompanying Technical Supplement, which have been determined to have environmental effects. These policies and details have been appraised as part of the SA/SEA.

The consultation document sets out nine proposed Core Planning Policies. Therefore the sustainability performance of each of the proposed Core Planning Policies was assessed. The potential sustainability impact of each of these matters was individually appraised against each of the fifteen sustainability objectives.

### **Preparation of the Report (Stage C)**

The Environmental Report is this document. It represents the full report of the SA/SEA appraisal of the planning policies in the 'One District, One Vision' document. The report presents background information on the Core Strategy and the SA/SEA process; the methodology for conduct of the appraisal; the full appraisal and its outcomes and the conclusions and recommendations of the appraisal.

There are three key components that inform the appraisal process.

#### **1. Baseline Information**

The baseline information for the SA/SEA of the 'One District – One Vision' document has been collated from a wide range of sources (See Scoping Report). The information provides the basis for assessing the potential impact of the options and will aid development of suitable alternatives and/or appropriate mitigation measures, together with future monitoring data.

It aims to highlight the current relevant data for Braintree District Council area; regional and national level data to compare local performance; established trends; identified targets; and existing environmental and sustainability concerns and problems.

#### **2. Review of Plans & Programmes**

The review of plans and programmes has considered a full range of planning policy and guidance documents, together with a broad range of documents that address sustainability objectives and issues of environmental protection (See Scoping Report). The plans and programmes inform,

- formulation of the sustainability objectives;
- the higher level context for preparation of the Core Strategy;
- identification of cumulative effects between the Core Strategy and other policies.

#### **3. SEA Objectives and Sustainability Framework**

The sustainability objectives have been derived from the review of plans and programmes and a strategic analysis of the baseline information. Objectives are based on policy advice and guidance and related to the assessment of the current state of the District. The

appraisal is then able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the plan's proposed policies. It also means that indicators established for use in the appraisal process itself can be carried forward into subsequent monitoring of the implementation and delivery of policies and proposals. Recognising which indicators can be used to assess the impact of policies being appraised is important and points towards the specific monitoring which will need to be carried out. Collection of this information over a period of time will result in data trends being established, which will show if the policies appraised, have a positive or negative impact on the social, economic or environmental factors they influence.

The Appraisal informs:

The extent to which the document and each selected statement may contribute to achieving the sustainability objectives;

- Any change in the degree of impact over time;
- Measures that could improve contribution of the document to sustainability;
- Any linkage with, or impact on, other statements or matters that could have broader implications and may be defined within one of 3 types of effect,
- Secondary effect – not a direct result of the statement, but occur away from the original effect or as a result of a complex pathway,
- Cumulative effect – whereby several statements each have insignificant effects but together have a significant effect, or where several individual effects have a combined effect,
- Synergistic effect – effects that interact to produce a total effect greater than the sum of the individual effects;
- Any other factors to consider during future work on the combined strategy document.

## 6. APPRAISAL OF POLICIES

### Introduction

This chapter of the Report sets out the appraisal of the Policies set out in the consultation document. The Policies have been identified as Policy CS1 through to Policy CS9.

Each proposed policy is appraised individually. The appraisal is structured by setting out each policy, as it appears in the consultation document, in a box which is then followed by the commentary of the appraisal. A summary of key points arising from the appraisal of each question is set out at the end of this chapter.

### Policy CS1 – Promoting Accessibility for All

Development, especially housing, employment, services and facilities will be:

- Focussed in accordance with the Spatial Policy Statement so it is fully accessible by a variety of modes of transport, in particular public transport, and to all abilities
- Located so as to reduce reliance on the private car to access local services and development which would or could significantly increase such use will be resisted
- Designed to secure the minimisation of environmental impacts of travel, to conserve energy and reduce air pollution by limiting the growth in traffic and encourage alternatives to car use.

The following improvements to accessibility and the transport network will be promoted and / or secured:

- The maintenance and enhancement of the public transport network, and in particular access to and use of rail services serving the District
- The promotion of community based alternatives to public transport, especially in the rural areas, by such initiatives as car pools, car sharing and voluntary mini bus services
- The greater use of sustainable transport and healthy lifestyles, including walking and cycling – by making those modes more integrated, accessible, safer and more attractive to use
- Necessary improvements to the national and regional road network where they would reduce safety problems, facilitate environmental enhancement, and support economic development
- The provision of the appropriate levels of car parking required to service the main towns and key service villages, and the promotion of walking and cycling within these centres

The proposed policy adopts a joint approach to the promotion of accessibility. It recognises the importance of achieving development at locations which can be served by a choice of sustainable means of transport and of securing improvements to the transport network to improve accessibility for all sectors of the community. Jobs, town centre services and facilities, and education and healthcare facilities that are located where people can travel by a variety of means will increase opportunities for residents. Alternative means of transport that reduce car use will have environmental benefits. Less congestion and lower emissions would improve air quality, and reduce demand for road space and car parking, thereby improving and maintaining visual quality of townscapes and landscapes. Nevertheless, where new transport infrastructure is required the design should have regard to environmental and visual impact and incorporate sustainable drainage systems to adequately manage surface run-off and pollutants.

The reference to ‘appropriate levels of car parking’ in the final bullet of the policy should be amended to reflect the Highways Authority approach based on maximum levels of car parking (with proposed amendment to minimum levels for residential areas, subject to the outcome of current Highways Authority consultation).

Adoption of any or all of the alternative options CS1ALT1, CS1ALT2 and CS1ALT3 would dilute the sustainability intentions of Policy CS1. Alternative option CS1ALT4 whilst limiting the environmental impact of new strategic transport infrastructure would adversely affect other sustainability objectives by limiting economic development and expansion of job opportunity within the District.

The policy would benefit from some elaboration of matters raised in alternative option CS1ALT5. As currently framed the policy is phrased in very general terms which could apply to any area. The consultation document does not make clear how the policy statements would be applied within Braintree District. For instance, there is no clear indication to service providers or developers of whether the listed initiatives are more likely in some areas rather than others, or whether development proposals should incorporate particular initiatives. Consideration should be given to how such guidance could be incorporated into the document, either within policy or supporting text. Requirements arising from the policy and the proposed distribution of development should also be cross-referenced to discussion of delivery and implementation of the strategy and included in the implementation framework. Thought should also be given to appropriate indicators and targets that would be used to monitor and assess progress toward achievement of the policy.

## **Policy CS2 – The Natural Environment**

Our natural environment policy will be to:

- Protect, enhance and manage the quality and diversity of the natural environment and habitats of the District, especially those designated for their nature conservation value on the Proposals Map
- Avoid the loss of the best and most versatile agricultural land
- Minimise the impacts of development on sites of European importance and meet the local recreational needs of the community by identifying, protecting, enhancing and managing the natural and informal open spaces across the District
- Ensure that developments (including the use of land) do not have an unacceptable impact on the natural environment of the District and beyond from:
  - Air, noise, light and other types of pollution
  - Excessive use of water and other resources
  - The generation of waste

The protection, enhancement and maintenance of natural features would contribute to the quality of life of the District by maintaining visual quality and variety of habitats. This benefit would be furthered by the proposed mitigation of unacceptable impacts from development on the natural environment. However, the consultation document does not detail the measures that will be used to secure such mitigation or the indicators or targets that will be used to measure successful application of the policy. This means that it is not possible to assess with any certainty the degree to which the intended benefits of the policy would materialise. Further, the policy should be enhanced to incorporate requirements, which are identified in the supporting text, to minimise flood risk and increased surface run-off and use of sustainable drainage systems. Consideration should

also be given to how the policy and the supporting text can demonstrate how the policy will be applied in the particular circumstances of Braintree District.

### **Policy CS3 – The Built Environment**

Our built environmental policy will be to promote and secure the highest possible standards of design and layout in all new development, so as to:

- Respect and respond to the local context, especially in the District's historic villages, urban conservation areas and areas of highest landscape sensitivity
- Create environments which are safe and accessible to everyone, and which will contribute towards the quality of life in all towns and villages
- Secure the maximum possible use of:
  - Renewable energy,
  - Recycled and/or energy efficient building materials and design,
  - Waste recycling facilities
- Be capable of meeting the changing future of occupiers, especially in housing developments
- Promote the sympathetic re-use of buildings, particularly where they make a positive contribution to the special character of the local environment and can contribute to the delivery of sustainable development and regeneration

The policy provides for a positive approach to design and townscape matters which should increase the visual attractiveness of the District. Improvements to the public realm, by emphasising quality of outcomes, could have the benefit of encouraging further investment to the District and of increasing the prospects for sustainable transport initiatives through greater confidence in use of public spaces and routes. Additionally, the emphasis on renewable energy, energy efficiency and waste recycling should contribute to mitigation of impacts of development whilst the requirement for lifetime homes would enable access to decent homes for all sectors of the community. Nevertheless, no reference is made to the need for new development to minimise flood risk and surface run-off and use sustainable drainage systems. Further, additional thought should be given to application of the policy within the particular circumstances of Braintree District, in line with alternative option CS3ALT2, and to identification of indicators and targets.

### **Policy CS4 – The Development of the Economy of the Braintree District**

The economy of the District will be developed and managed so as to:

- Broaden the opportunities for business and secure the delivery of employment land in the District by:
  - Seeking to redress the historic imbalance between housing and employment development
  - Maintaining high levels of local employment
  - Establishing a flexible and broadly skilled workforce and
  - Taking measures to reduce out-commuting
- Protect and enhance key existing tourist and visitor facilities and infrastructure, whilst also promoting suitable new tourist development in appropriate locations, in order to increase the range, quality and type of facilities available
- Promote sustainable economic development by encouraging appropriate home working
- The diversification and strengthening of the rural economy will be promoted by supporting a range of appropriate employment opportunities subject to the criteria in Core Planning Policy CS2 – The Natural Environment

Development of a broadly based successful local economy would contribute to improved quality of life within Braintree District by having a positive impact on employment opportunity and income levels whilst encouraging a greater range of services and facilities. In particular a strong local economy should benefit the viability and vitality of town centres and provision of sustainable transport initiatives by increasing local activity by residents within the District. However, these benefits would require a coordinated programme to link progress in economic and other development with sustainable transport initiatives to ensure that appropriate transport facilities were available upon first use of development. Such an approach is more likely to result in a lasting sustainable switch from private car use with consequential environmental improvement to visual amenity and emission and pollutant levels. The specific reference to Policy CS2 should facilitate accommodation of economic development within the environmental framework of the District, although the degree to which this could be achieved will depend on identification and further assessment of mitigation measures to be applied through application of Policy CS2. Further, the equal relevance of the third bullet of Policy CS3 should not be neglected in terms of sustainability.

The relevance of alternative options CS4ALT1 and CS4ALT2 is unclear, given that Policy CS4 does not specify a level of future employment land development.

### Policy CS5 – Distribution of Employment

The Council and its partners will provide for the development of a minimum of an additional 33.5 hectares of land for employment development, which will be phased to ensure a continuous seven year supply

The distribution of land and type of additional allocations of employment land between 2007 and 2025 are proposed at the Growth Locations as follows:

<b>Growth Location</b>	<b>Type of Employment</b>	<b>Site (Hectares)</b>
Braintree – land to the north-west off Panfield Lane	General employment	15.0
Braintree – land to the west of the A131 at Great Notley	Business Park B1-B2	12.5
Witham – land to the north-east off Eastways (within Rivenhall)	General employment	6.0
<b>Total</b>		<b>33.5</b>

These Growth Locations are identified on the Key Diagram.

The provision of additional employment land should contribute to maintaining the economy of the District and achieving a better balance between homes and jobs. This should also help increase local opportunities, reduce the need for residents to engage in long distance commuting and facilitate increased use of sustainable means of transport. Nevertheless, the policy wording could be improved to clarify that a total of 66 hectares of employment land will be available (including 32.5 hectares of existing vacant/allocated employment land) and that it is this total that will be phased to ensure a continuous 7-year supply, not just the additional provision of 33.5 hectares.

Identification of the three additional employment land locations should further assist this process, given their situation at the two main towns of Braintree and Witham and with good access to the strategic road network. The additional locations, together with existing vacant/allocated employment land at the two towns, would provide a variety of sites with opportunity to accommodate a range of employment uses. Retention of existing

employment land at Halstead and Sturmer will allow continuing economic development in the north of the District, although the take-up of these sites should be monitored alongside Policy CS6 to ensure a balanced approach between use of these sites and 'rural' sites that does not adversely impact the environmental resource in this part of the District. Detailed appraisal of each of the three proposed employment land locations is set out in the following section (Section 7 – Appraisal of Locations).

Alternative options CS5ALT1, CS5ALT2 and CS5SLT1 should be considered together, given that the Employment Land Review recommends provision of 3-5ha over the plan period. The District Council should satisfy itself that the proposed employment land provisions are sufficient to address the current economic and employment issues identified in the consultation document and to meet the authority's objectives for the future economy and environment of the District. Additionally, alternative option CS5ALT3 should be considered in similar terms but with any reduction in land provision being based on analysis of the individual requirements and opportunities of Braintree and Witham rather than a purely statistical exercise. Further, it should be noted that in all probability future employment growth in the District will not solely occur on areas of identified employment land. The designated employment land will accommodate provision for certain types of employment use (generally in Use Classes B1 to B8). The Core Strategy should also consider the scale and type of employment that will be provided at other locations, such as town centres, local centres, health and educational establishments, working from home, etc.

## **Policy CS6 – The Rural Economy**

The rural economy will be supported by encouraging and facilitating developments which:

- Would give priority to the appropriate re-use of suitable previously developed land or buildings where these are in appropriate locations for employment uses
- Can be shown to help towards the promotion and viability of local farming enterprises, the diversification of agriculture and recreation uses appropriate to a countryside location
- Do not encourage unsustainable forms of travel, especially by large numbers of people, or would cause unacceptable impacts on the highway network
- Would respect and reinforce local character, and have acceptable impacts on the local and wider countryside environment.

The promotion of employment uses and diversification of the rural economy should increase the range of job opportunities and support local communities. The development of additional small businesses in rural areas can make a key contribution to the District economy. However, care will be needed to ensure transfer to available more suitable sites in key service villages and the main towns as businesses grow, so that impacts caused by increasing scale of operations can be suitably addressed. Similarly, attention will need to be paid to the cumulative impact of small developments in a localised rural area and the nature of the business in terms of potential off-site impacts, particularly transport requirements both in terms of type of vehicle and number of journeys. In this context, the scale and distribution of employment uses arising from Policy CS6 should be monitored alongside take-up of allocated employment land at Halstead and Sturmer to ensure a balanced approach to employment land provision and environmental resources in this part of the District. The supporting text to the policy should set out clear guidance on interpretation of the various uses of the word 'appropriate' in the first two bullet points and the interpretation of the words 'unacceptable' and 'acceptable' in the third and fourth bullets respectively.

## Policy CS7 – Town Centres and Regeneration

Economic Development will be promoted and secured in accordance with the following broad priorities.

1. The regeneration of key sites in the Main Town and Key Service Villages
2. The safeguarding of existing employment sites
3. The allocation and promotion of employment redevelopment areas
4. The designation and development of new employment locations
5. The allocation, promotion and development of a new innovation and enterprise park
6. The promotion of mixed use developments

These priorities will be promoted and developed in accordance with the principles set out in this Strategy, and further detailed proposals and policies are set out in the Site Allocations and Development Policies Documents.

Supplementary Planning Documents may also be produced to set out the requirements for some sites in more detail.

The promotion of economic development in town centres and through regeneration should contribute to maintaining the economy of the District, diversifying the range of employment sectors, especially through the allocation of a new innovation and enterprise park, and supporting local communities. Regeneration and development in the District's main towns and key service villages focuses development in sustainable locations that are already served by existing road and public transport infrastructure. Regeneration of these areas could lead to increased attractiveness and image of the areas which in turn could increase the number of visitors and businesses. Increased footfall in main towns and key services would maximise the potential for safety through natural surveillance and the presence of people deterring criminal activity as well as improving the quality and aesthetics of the area.

It would be important to ensure high quality design, especially in areas in or near to conservation areas or containing listed buildings or sites of historical interest that is responsive and sympathetic to local characteristics and townscape character. The use of previously developed land would potentially reduce the amount of derelict, degraded and underused land; however contaminated land assessments together with appropriate mitigation would be required on a site by site basis. The incorporation of sustainable drainage systems should be promoted in all developments to improve water quality and minimise potential flood risk.

Policy CS7 lists the economic development priorities, but does not specify whether or not the order of the listing is the preferred order of priority for development. The option of promotion of certain priorities ahead of other priorities could reduce the flexibility in delivery of economic development should certain priorities not be realised. Detailed sustainability appraisals will be required for site specific proposals when they are known.

The policy states that the regeneration of key sites shall occur in the Main Town, which would suggest Braintree only, however the document also makes reference to regeneration within Witham town centre, and areas of Halstead town centre. It is recommended that the policy wording is changed to state that the regeneration of key sites in the 'Main Towns' is promoted, to avoid any possible misinterpretation.

## Policy CS8 – Housing Provision and Delivery

Provision will be made for dwellings between 2006 and 2025 in accordance with Policy H1 of the East of England Plan

These dwellings will be located in accordance with the Spatial Policy for the District:

- In the urban areas of Braintree, Witham and Halstead
- In the Key Service Villages
- In the new mixed-use Growth Locations to be developed when required at Braintree and Witham
- In small scale developments in other defined settlements to cater for local needs affordable housing or as appropriate infilling
- As part of mixed use developments in the identified regeneration areas

All sites, apart from Exception

Sites for affordable housing will be defined on the Site allocations DPD Proposals Map.

In all these areas provision will be made for a range of different dwelling types and sizes to meet the identified housing need for all sectors of the community.

Affordable housing will be directly provided by the developer within housing schemes on the following basis:

- A threshold of 5 dwellings or 0.2 hectares with a percentage of 40% affordable. Where this requirement is shown not to be feasible, developers must examine fully all alternative ways to deliver the same amount of affordable housing on the site.
- Exceptionally, off-site provision may be acceptable if on-site provision is shown to be unviable or otherwise impractical.
- On site below 5 dwellings a tariff will be charged to contribute towards the delivery of affordable housing across the District.

Provision will be made for sites in suitable locations to cater for:

- Gypsies and travellers and
- Travelling show people

Which meet the currently defined local need of the District.

New housing will be designed so that:

- Densities will be appropriate to the character of the location / settlements concerned. Higher densities will be appropriate in the main town centres and those Key Service Villages where it would reflect and complement the character of that settlement
- High quality, practical and sustainable living environments will be created
- In the Growth Locations, local employment opportunities, open space and day to day services can be provided or secured nearby
- High-quality non-car access links are provided to the main local services and employment areas

Affordable housing will be an integral part of the overall development and all dwellings can meet the challenging needs of occupiers

The provision of housing in accordance with the East of England Plan assists in providing everyone with the opportunity to live in a decent home. The policy responds to a need for inclusive access to housing which in combination with the District's affordable housing target will provide a larger proportion of the population an opportunity to live in the District. Provision for gypsies and travellers and for travelling show people should be in accordance with the outcome of the current review of the Regional Spatial Strategy. Individual sites would need to be subject to site specific sustainability appraisals.

The proposed policy does not set out how the regional allocation is to be distributed throughout the district, or phased over the plan period. The RSS allocation equates to 4,340 dwellings for Braintree to 2021; reference to the Spatial Policy within the consultation document indicates a distribution of dwellings across the district as follows:

- Braintree 2,100
- Witham 1,300
- Halstead 500

This would indicate that a provision for 440 dwellings would be required within the Key Service Villages, the Other Villages and the Countryside to meet the regional allocation. However this distribution is not set out within Policy CS8 or its supporting text. The sustainability of site specific allocations will require separate appraisal.

The policy lists the location of proposed developments in accordance with the District's Spatial Policy Statement; however this differs from the 'Hierarchy of Place', as stated in Part 4, paragraph 4.5 of the consultation document. As currently worded there is no order of priority for the delivery of housing within the locations outlined. Reference to the use of previously developed land and development being within the settlement boundaries would help to clarify the policy wording with regard to location.

In sustainability terms, delivery of housing in existing urban areas and key service villages could be supported by existing services and facilities, as well as existing road and public transport infrastructures. High quality and useable pedestrian and cycle access should be provided as part of new housing development to promote sustainable transport choices for short journeys and increase pedestrian footfall in town centres and villages, thus increasing consumer activity.

Increased levels of cycling and walking of residents and the inclusion of open space within Growth Locations would promote healthy active lifestyles. The regeneration of areas and infilling within existing settlements is likely to improve the quality of the townscape through a reduction in the amount of derelict, degraded and under-used land. The policy also states that the new housing densities will be in keeping with the character of the location concerned. No specific details on renewable energy use, sustainable construction methods, a desire to reduce household emissions or to promote energy efficiency is included as part of the policy. These details would be more adequately dealt with however in Policy CS3.

## Policy CS9 – Services and Facilities

The Council will work with partners, service delivery organisations and the development industry, to ensure that the services and facilities required to provide for the future needs of the community (including health, education, policing, sport, the arts, and local community facilities) are delivered in a timely, efficient and effective manner.

Provision will be funded by:

- The delivery body concerned
- The community infrastructure levy (NOTE – definition) or
- The Council's own standard charges through legal agreements

So as to be widely available as possible, the provision of major services and facilities will be directed, as appropriate towards the Main Towns, regeneration areas, Key Service Villages and Growth Locations as set out in the spatial policy

In the Other Villages and Rural Areas, services and facilities will be supported, developed and located to meet the defined needs of each settlement or the immediate local area.

The loss or significant reduction of, existing services and facilities will be resisted unless:

- There is sufficient evidence that they are no longer viable or needed or
- Satisfactory alternatives are available.

The provision of services and facilities through specified funding streams should ensure accessibility to services within the growth locations, new developments and the existing community. The list of community needs should be clarified to note that the list is not exclusively restricted to those noted. Services and facilities notably missing from the list include transport services and sustainable building practices and fit out, (such as Sustainable Urban Drainage Systems (SUDS), connection to District heating systems, non potable water networks, and private wire networks providing power generated by low and no carbon generation). The policy could be amended to provide for funding by more than one means by amending the 'or' to 'and / or' after the second bullet point for the avoidance of doubt. The requirement for the provision of services and facilities would need to be assessed on a site by site basis and subject to a sustainability appraisal in each case.

## Summary of Appraisal of Policies

The key points arising from the appraisal of each question are shown in Table 3.

**TABLE 3: SUMMARY OF APPRAISAL OF POLICIES**

Proposed Policy	Summary of Appraisal
CS1 – Promoting Accessibility for All	The proposed policy supports sustainability objectives relating to transport and environmental protection. However the mechanisms for delivery and implementation of the strategy would benefit from further elaboration.
CS2 – The Natural Environment	The policy addresses the protection of the natural environment, and supports sustainability objectives especially with regard to quality of life, biodiversity and landscape. The policy could be enhanced to incorporate minimisation of flood risk, surface water run-off and the incorporation of sustainable drainage systems. The extent to which there are impacts on the management of the natural environment will also depend on the detail of other DPDs that should be subject to separate SA/ SEA.
CS3 – The Built Environment	The proposed policy positively addresses sustainability objectives. However there is no reference to flood risk, and management of surface water run-off. Furthermore the policy as worded lacks specificity to Braintree District Council which could be addressed as the policy is refined through the plan preparation process.
CS4 – The Development of the Economy of the Braintree District	Reference to CS2 supports economic development within the proposed environmental framework in so far as policy CS2 meets sustainability objectives. The policy could benefit in sustainability terms through reference to sustainable transport measures.
CS5 – Distribution of Employment	The Council needs to be satisfied that the employment land provision will be adequate for the plan period. Individual sites proposed would need to be subject to separate sustainability appraisals.
CS6 – The Rural Economy	The proposed policy supports economic sustainability objectives but potentially conflicts with environmental objectives, especially those which are related to the use of private motor vehicles. The policy would benefit from a strategy to deal with the potential relocation of operations which increase in scale to more sustainable locations. Similarly attention should be paid to the cumulative impact of small developments.
CS7 – Town Centres and Regeneration	The strategy proposed locates regeneration and development in the most sustainable locations. Separate assessment of the proposed sites for regeneration and development would be required.
CS8 – Housing Provision and Delivery	The policy broadly accords with the sustainability objectives especially with regard to quality of life, however the sustainability of specific allocations will require separate appraisal. Reference to the use of previously developed land and development being within the settlement boundaries would help to clarify the policy wording with regard to location. With regard to design the policy would benefit in sustainability terms through the inclusion of reference to energy efficiency and sustainable drainage systems.
CS9 – Services and Facilities	The proposed approach accords well with the sustainability objectives. However, further assessment of individual sites would be required to ensure that at the site specific level, the policy delivers sustainability objectives.

Furthermore, the review of the document has identified some points for consideration during the next stage of document preparation as follows:

- As currently phrased, many of the proposed policies could apply to any area, and lack Braintree District specificity. Consideration should be given to how the policies can be worded to relate to the local policy needs of Braintree.
- The document does not set out the proposed settlement distribution for the District.
- The housing and employment provision policies would benefit from reference to the provision of infrastructure necessary to support development with an indication of timing and funding.
- The document does not set out the proposed phasing for development within the district or the timing of necessary infrastructure to support development of phases.
- The consultation document does not set out a policy that identifies a hierarchy of town and retail centres in the district or provide guidance on the future role, development or accessibility of such sites.
- Overall the document would benefit from clear guidance on flood risk in the District and a firm commitment to sustainable drainage systems. Similarly a commitment to energy efficiency and sustainable construction methods throughout development would assist sustainability objectives.
- Clarification will be required as to the proposed monitoring framework and identification of indicators and targets for the delivery of the policies within the Core Strategy.



## 7. APPRAISAL OF INDIVIDUAL LOCATIONS

### Introduction

This chapter of the Report sets out the appraisal of the Individual Locations set out in the consultation document. The Policies set out in the consultation document are discussed in the preceding section of the Report.

The Individual Locations have been identified from those contained within Policy CS 5 and paragraphs 4.40 – 4.44 within the consultation document. Each location has been appraised individually in terms of each possible future role which is being considered for it during the preparation of the DPD.

The appraisals are structured by setting out each proposed location as it appears in the consultation document, in a box which is then followed by a commentary of the appraisal for each relevant location.

### Mixed Use: Land to the north-west of Braintree – off Panfield Lane

Growth Location:

Land to the north-west of Braintree – Off Panfield Lane

Number of Dwellings:

500

Other Potential Uses

Employment (15 hectares)

New Braintree College

New football stadium

Community facilities (including local shops)

Open space

The consultation document proposes mixed use development of land to the north-west of Braintree, off Panfield Lane, to include residential development of 500 dwellings, together with 15 hectares of employment land and community uses. Key issues for consideration prior to allocation would include:

- Mix of uses and how they would relate to each other;
- Infrastructure requirements;
- Phasing of the different uses at this location;
- Development timetable, and flexibility in delivery;
- Existing Use.

Careful consideration would need to be applied to the layout at this location to ensure that the proposed mix of uses were to be appropriately distributed. The quality of life of potential residents could be positively or negatively impacted by the location, layout and position of servicing infrastructure for the proposed employment uses and new football stadium within the location. Similarly transport, both by private motor vehicle and sustainable transport measures would need to be considered from the outset to ensure that peak flows for each of the uses proposed would not impact on other uses, either individually or combined. Once detailed options were available these would need to be subject to separate sustainability appraisals.

The location is not within close proximity to any listed buildings or scheduled monuments. The Special Landscape Designation, the presence of the historic Panfield Hall and the presence of large ancient woodland mean that development would need to be designed to minimise any impact on these designations and to preserve and enhance visual amenity. The potential development is not located in a flood risk area although a development of this size would require a flood risk assessment to ensure that any proposed layout would not create localised flooding or adversely affect the surrounding area including an area identified as flood risk zone 3 associated with the River Blackwater located to the North of the location.

The location is in close proximity (approx 1km to the closest edge) to Braintree Town Centre allowing access to services, public transport network and shopping facilities. The location is also close to and may potentially include existing recreational facilities at the northern end of Panfield Lane. Provision of community facilities within the new development could be accessed by new residents and residents within the existing settlement. The location is also favourably positioned in terms of close proximity to a hospital and schools, although the capacity and capability of these would need to be investigated prior to allocation. Public transport provision in the Panfield Lane Area would need to be increased in order to sufficiently serve the new housing and employment development, the football ground and the college in order to minimise so far as possible additional private car use.

Development of this scale would need to be supported by a phasing schedule to ensure the delivery of infrastructure and facilities in a timely and appropriate manner. Local traffic issues associated with key junctions on the A120 would potentially be increased with further employment and residential development. Furthermore the junction at Rayne Road is already considered potentially significant in air quality reviews. Further investigation into improvement of the A120 close to Braintree town will need to be undertaken prior to the allocation of this location.

Options regarding the flexibility of delivery at this location should be explored prior to allocation, to ensure that development is brought forward in a timely and orderly manner. Should certain uses not be deliverable at this location as programmed, consideration would need to be given to ensuring delivery of the necessary infrastructure to support the other uses within the proposed development.

The location is in existing use as open space which includes playing fields and a BMX area to the east of Panfield Lane. Development at this location would need to ensure that removal of these facilities does not lead to a deficiency of this provision.

## Mixed Use: Land to the south-west of Witham – off Hatfield Road

Growth Location: <ul style="list-style-type: none"><li>• Land to the south-west of Witham – Off Hatfield Road</li></ul>
Number of Dwellings: <ul style="list-style-type: none"><li>• 600</li></ul>
Other Potential Uses <ul style="list-style-type: none"><li>• Community facilities (including local shops)</li></ul>

The consultation document proposes use of land to the south-west of Witham (off Hatfield Road) for mixed use development to include 600 dwellings and community facilities. The key considerations at for this development location would be:

- Accessibility
- A12 Junction

The development would have good access to existing employment areas and the town centre as it is served by bus links, and some facilities are available within suitable walking distance (800m). Safe pedestrian access should be created from the development to surrounding areas to encourage the use of more sustainable transport methods for residents which along with the inclusion of open spaces within the development and its close proximity to Bramston Sports Centre will promote active healthy lifestyles.

There are current capacity issues at Junction 21 of the A12 to the south west of the location, and there is no slip road for traffic travelling to and coming from the north. The Highways Agency are proposing to provide an additional southbound auxiliary lane to improve the capacity and safety of the A12, between Hatfield Peverel and Witham in 2010. Further residential development at this location has the potential to increase traffic at Junction 21. Furthermore the limited access at the junction reduces accessibility from this location to the wider strategic road network and could result in higher levels of traffic through the conservation area of Witham town centre. Traffic could contribute to increased congestion and have an adverse impact on air quality, particularly at two potentially significant junctions within Witham town centre.

The potential impact of development on surface water run-off localised flooding and water quality both on location and downstream, including environmentally sensitive areas in Blackwater Estuary, would need further analysis when plans become more detailed.

## **Mixed Use: Land to the north-east of Witham – off Forest Road in the parish of Rivenhall**

### Growth Location:

- Land to the north- east of Witham – Off Forest Road in the parish of Rivenhall

### Number of Dwellings:

- 300

### Other Potential Uses

- Community facilities (including local shops)
- Open space

The consultation document proposes mixed use development at land to the north-east of Witham off Forest Road to include 300 dwellings, community facilities and open space. Key considerations for development in this location include:

- Accessibility
- Boundary Treatment

The provision of community facilities in the development and close proximity to existing housing developments and associated facilities could encourage community cohesion creating a safer environment. The potential provision of 120 affordable units would assist in providing the opportunity to live in a decent home. Access to open spaces, to be included within the development, would help to promote active lifestyles. The development is over 800m from the town centre and railway station. Forest Road is currently served by twice hourly bus services to the town centre and railway station, the latter of which is also accessible via a new cycleway link from Cypress Road to Cut Throat Lane. Extensions to existing bus routes or creation of new services to accommodate the development should be explored. Increased pressure on existing public transport may otherwise increase the number of short car journeys into town. Increased traffic may lead to increased congestion; putting pressure on parking provision; and negatively affecting air quality at Potentially Significant Junctions at both Crossing Road and Newland Street. Provision of a safe, adequate pedestrian/cycle route across the railway would give good access to the employment areas east of the town and also an alternative route to the town centre using more sustainable transport choices. This could be partially funded via contributions from the new development.

There are no designations with regard to biodiversity, heritage or flood risk at this location. However consideration should be given to the impact of potential increases in traffic passing near to the designated Local Wildlife Site of the Old Rectory Meadows as a result of the development. The potential impact of development on surface water runoff, localised flooding and water quality both on location and downstream would also require further analysis when plans become more detailed.

The development location comprises elevated greenfield land on the edge of Witham contributing to the physical and visual separation between Witham and nearby settlements. Development of the location would need to be accompanied by sufficiently sensitive boundary treatment, to ensure that the visual quality and aspect of this sensitive edge of town location was maintained.

## Single Use: Braintree – land to the west of the A131 at Great Notley

Growth Location:

- Braintree – land to the west of the A131 at Great Notley

Type of Employment

- Business Park B1 – B2

Site (Hectares)

- 12.5

The consultation document proposes 12.5 hectares of B1 and B2 Business Park on land to the West of the A131 at Great Notley. A recent employment review suggests that a site close to the A120 would potentially be an attractive investment opportunity. Key issues for consideration at this location would be:

- Accessibility;
- Boundary treatment.

The site is adjacent to the A120 strategic route which provides access to Stansted Airport and the national motorway system. There is also good access south via the A131 to the sub-regional centre of Chelmsford. However the A131 creates a barrier between the development and Great Notley which could increase private car use should sufficient public transport links not be provided. Existing employment uses at the Skyline industrial area, and the supermarket east of the proposed location would assist opportunities for the extension of existing public transport services to the location.

The development could increase the amount of inward investment at Braintree and provide additional employment opportunities within the District. The District experiences shortages in financial and business services, IT, transport and communications industries in comparison to regional and national models. The B1 and B2 use classes proposed for the business park could provide a more balanced employment structure.

The location is south of Great Notley Country Park, which potentially limits the type of employment uses that that would be suitable to operate. The Country Park is a valuable local asset and any development would be expected to have minimal impact on the site, both in terms of visual amenity through the use of border treatment and the preservation of natural habitats. A business park for B1 and B2 Use Classes, rather than more general employment, would be most appropriate for this location. The area has medium landscape character and visual sensitivity and a high landscape value due to the Country Park and the listed buildings at Slampsey's Farm to the south. Three listed buildings exist at the southern edge of the growth location and detailed proposals would have to maintain their setting and integrity. The site is not located in Flood Zone 2, 3a or 3b however the Technical Supplement accompanying the draft Core Strategy highlights the need for drainage and sewage improvements.

## Single Use: Witham – land to the north-east off Eastways (within Rivenhall)

Growth Location:

- Witham – land to the north-east off Eastways (within Rivenhall)

Type of Employment

- General employment

Site (Hectares)

- 6.0

The consultation document proposes development of land to the north-east of Witham, off Eastways, for development of 6 hectares of general employment land. The location is adjacent to the northern edge of existing employment and industrial land which extends some 60 hectares to the south adjacent to the A12, and along the railway line to the south west of the proposed development location. Key issues for consideration prior to allocation would include:

- Infrastructure requirements;
- Relationship with existing development;
- Boundary treatment.

The location close to the A12 and off Eastways through an existing employment site, allows good transport links to the A12 and the wider strategic highway network. Transport infrastructure requirements would need to be investigated prior to allocation to ensure that access by private car and commercial vehicles could be adequately accommodated. Sustainable transport measures would also need to be explored to promote the use of travel plans, and to utilise and extend where appropriate the existing bus routes. There is the potential for an upgraded cycle / foot link between Eastways and the housing development to the north which could be partially funded via contributions from the new development.

The proposed use classes at the location would need to be appropriate to both identified need and neighbouring uses. There are no designations with regard to biodiversity, heritage or flood risk at this location. However the development location comprises greenfield land on the edge of Witham contributing to the physical and visual separation between Witham and nearby settlements. Development of the location would need to be accompanied by sufficiently sensitive boundary treatment, to ensure that the visual quality and aspect of this sensitive edge of town location was maintained.

## 8. SIGNIFICANT EFFECTS

The SEA Directive and Regulations require that an assessment is made of the likely significant effects on the environment.

The 'One District – One Vision' document presents a reasonable range of options for potential policy approaches for Braintree District Council's Core Strategy. The proposed policies contained in the document are unlikely to lead to large scale significant adverse effects beyond those identified in the appraisal.

The key areas with potential for likely significant effects are:

- changes to landscape character;
- protection of biodiversity;
- quality of the historic heritage;
- air quality;
- water quality;
- flood risk;
- continuing homes / jobs imbalance;
- failure to align development and infrastructure provision.

Further work associated with the production of the Core Strategy should be undertaken to ensure that the development policies and the development of locations are aligned; the greater the alignment between the policies and the development locations then the greater the prospect of reducing the adverse impacts.

Further preparation of the strategy should be supported by:

- An assessment of the risks associated with policies not being delivered in a co-ordinated way;
- A Monitoring Framework that includes proposed indicators, particularly for the potential significant effects;
- An Implementation Framework that includes a list of necessary infrastructure and service provision and mitigation measures to facilitate implementation of the strategy, together with their delivery timescales.

In October 2005 the European Court of Justice concluded that Article 6(3) of the Habitats Directive provides that any plan or project not directly connected with or necessary to the management of a European site (a SAC, SPA or Ramsar site) but likely to have a significant effect thereon, either individually or in combination with other plans or projects, must be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. Braintree District Council has commissioned Royal Haskoning to undertake an Appropriate Assessment of the effects of the development proposed in the Core Strategy upon protected European Sites.



## 9. CONCLUSIONS

The consultation document sets out a range of realistic policies for consultation purposes for further development of the preferred strategy. The proposed policies set out in the document are unlikely to lead to large scale significant adverse effects beyond those identified in the appraisal.

Braintree District Council, in considering the responses to the consultation on the consultation document and when preparing the next stage of the Core Strategy, is recommended to consider the following points:

- As currently phrased, many of the proposed policies could apply to any area, and lack Braintree District specificity. Consideration should be given to how the policies can be worded to relate to the local policy needs of Braintree.
- The document does not set out the proposed settlement distribution for the District.
- The housing and employment provision policies would benefit from reference to the provision of infrastructure necessary to support development with an indication of timing and funding.
- The document does not set out the proposed phasing for development within the district or the timing of necessary infrastructure to support development of phases.
- The consultation document does not set out a policy that identifies a hierarchy of town and retail centres in the district or provide guidance on the future role, development or accessibility of such sites.
- Overall the document would benefit from clear guidance on flood risk in the District and a firm commitment to sustainable drainage systems. Similarly a commitment to energy efficiency and sustainable construction methods throughout development would assist sustainability objectives.
- Clarification will be required as to the proposed monitoring framework and identification of indicators and targets for the delivery of the policies within the Core Strategy.

