

**Proposed Changes to the One District-One Vision Core Strategy in response to comments received during the public consultation in November to December 2008.
Agenda Item 5**

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Background Papers: Representations on One District-One Vision A Draft Strategy for People and Places in the Braintree District to 2025.
Financial Implications: Not as part of this report. Potentially future implications for Council budgets arising from proposed land uses and policies in the draft Core Strategy.
Equalities Implications: Yes
Legal Implications: No
Options: To approve, or not to approve the recommendations set out in this report. To amend the recommendations.
Risks: It is important that the comments are fully assessed and taken into account in preparing the Submission Core Strategy to avoid the plan being found unsound.

EXECUTIVE SUMMARY

This report summarises the objections to and comments in support of Parts 5 and 6 of Core Strategy, which were made during the public consultation on the One District- One Vision Strategy in November and December 2008.

These were the remaining comments on the text of the Core Strategy, which were not previously considered at the Panel Meetings on 15th April and 20th May. The report sets out objections and comments relating to sections of the Core Strategy, following the same order as the Core Strategy document. The report lists the title of the relevant section, paragraph or policy number of the Core Strategy. It then sets out objections to, and comments in support of, that part of the Core Strategy. Officers comments are included where relevant and officers recommendations of changes to the Core Strategy.

This report does not consider alternative growth location proposals, which, if necessary, will be the subject of a report to the next Panel meeting on 29th July.

Part 5 –The Four Priority Themes for the Braintree District

This part of the document lays down the 4 priority themes for the District

- Promoting accessibility for all
- Creating a clean and green environment
- Achieving a prosperous local economy
- Enabling everyone to enjoy a safe and healthy lifestyle

and includes the core planning policies and community priorities associated with each broad area.

5.1 - 5.3

This is the introduction to Part 5 and identifies the priority themes and how each theme is set out.

Objections

- Securing a choice of methods of travel is also very important - Go-East
- Support linkages and systematic approach between SCS and CS but this should be clearer elsewhere in the text - Go-East
- Objection to fact that the priority themes are numbered, as this might imply a hierarchy of importance.
- Braintree would benefit from play park facilities for children of all ages.
- The pursuit of financial wealth is not necessarily consistent with a safe, happy and healthy life
- Local indicators are not discussed at all, or who will be responsible for collecting and reporting.

Support

- Support provision of high quality green spaces and sport and recreational facilities. Want to see recreational areas which are dormant or active to be retained - Witham Town Council

Policy CS1 – Promoting Accessibility for All

Promoting and securing accessibility and an efficient transport network are one of the key features of achieving sustainable development. This policy says that the location and design of new development should reduce reliance on private cars and that the Council will make improvements to public transport and road networks where appropriate. It will also continue to promote community based transport schemes and walking and cycling.

Objections

- More should be done to improve bus and rail connections
- Accessibility affects all communities not just rural areas - Local Strategic Partnership
- The business community has reservations about development where the road infrastructure is not adequate to cope - Braintree Chamber of Trade
- Support improvements to public transport as a way of tackling climate change
- The Core Strategy should identify a role and development potential of transport corridors

- Reference should be made to travel plans and demand management measures in the main towns - Essex County Council
- Carefully provided and integrated mixed use residential and employment areas promote local employment and minimise car use
- Dropped kerbs would encourage people to cycle to work on industrial areas in Witham
- An A120 link to the A12 must be built before development in Braintree goes ahead
- The movement of people to and from work/shopping etc has a major impact on quality of life
- Planning for any further development is a waste of time until the infrastructure has been put in place
- Encouraging outdoor activity like walking and cycling will also add to people's quality of life, health and well-being - Natural England
- The Flitchway settlement meets all the criteria set out in the proposed policy
- Access to recreation and leisure facilities has been omitted.
- Reference should be made to the hierarchy of transport modes which should be prioritised when considering the accessibility of development - Highways Agency
- The 2nd bullet point results in a 'sustainability trap' for rural communities and is against guidance in PPS1 and PPS3
- As currently set out and expressed, this policy wording is largely a statement of intent. It should either be clearer or removed. It should not repeat national policy. The Core Strategy itself should be focussing on strategic matters that relate to real programmes and proposals that can be delivered and not just stating broad intentions - Go-East
- Boxted Wood supports and fulfils the criteria of this policy.
- Seek reassurance that facilities includes green infrastructure - Natural England.

Support

- Agree it is important that employment areas are accessible by a range of transport modes
- EEDA welcomes the recognition of Eddington's principles reflected in your Core Strategy- East of England Development Agency
- Agree that it is essential that in order to develop housing, employment, community facilities etc that they should be accessible by a variety of transport modes

Officer Comment

The Eddington report was commissioned by the government in 2005 and reported in 2006. It was called; 'Transport's role in sustaining the UK's productivity and competitiveness' and advised government to concentrate future transport investment on urban catchment areas, interurban corridors and national gateways as these are the most economically significant parts of the network and to ensure that transport meets its full environmental costs.

There have been a number of comments in this section relating to the need for specific transport schemes. The infrastructure study will include details of

all transport schemes which are essential for the proposed growth to go ahead. In addition there are a number of larger schemes, including the improvement of the A120 between Braintree and Marks Tey, which the District would like to see completed. However due to their size and scale funding and programming is decided at a regional or national level and is outside the Council's control.

5.4-5.5 and Option CS1 ALT 1- 5

This section suggests alternatives to the suggested policy CS1 but notes that taking any of these approaches would be against national and/or regional policy guidance.

Objections

- ALT4 is misleading. What are improvements? If they are to improve safety then they should be supported. If it is to widen the A12 they should be resisted

Support

- Agree all ALT options are wrong

In addition the following questions on the Have Your Say Questionnaire were related to accessibility.

Question 4: People should be encouraged to work nearer to where they live.

Strongly Agree – 40

Agree – 51

Disagree – 30

Disagree – 4

Question 8: Better public transport is still one of the highest priorities for many people.

Strongly Agree – 63

Agree – 48

Disagree – 13

Strongly Disagree – 0

Question 9: Walking and Cycling should be encouraged

Strongly Agree - 43

Agree - 58

Disagree - 2

Strongly Disagree – 1

Recommendations

The four priority themes in 5.1 should be bullet points rather than numbered to show there is no hierarchy within the priority themes That Policy CS1 should be approved subject to the following amendments and in line with the comments from Go-East, the emphasis in Policy CS1 should be on projects to be carried out, rather than statements of intent.

To include references to demand management and travel plans within Policy CS1

A hierarchy of travel modes should be included in Policy CS1 with pedestrians and cyclists at the top and motorised private vehicles at the bottom

There should be recognition in Policy CS1 that whilst the Council wishes to maximise the use of non-car modes, this may not be practical/possible in more isolated rural locations.

Policy CS2 – Natural Environment

CS2 details how the Council will help to create a clean and green environment by protecting and enhancing habitats, the natural environment and our best agricultural land and by protecting the natural environment from the impacts of pollution, waste and excessive use of resources.

Objections

- It is not always possible to avoid the best and most versatile agricultural land all the time.
- Reference should be made to the concepts of living landscapes - Essex County Council
- The policy should make reference to positively encouraging renewable energy developments
- Enhancements of bio-diversity, environment and woodlands are not specifically addressed - East of England Regional Assembly
- Should be an indication of how protecting/enhancing/management of the natural environment will be achieved - Go-East
- Flood risk and the sequential test should be dealt with explicitly in the Core Strategy - Go-East
- Suggest the addition of providing open air leisure facilities and access to the natural environment for residents
- The policy should also include the skies and the District should oppose concentrated flight paths over otherwise tranquil areas.
- Planning should recognise its duty to protect and reduce pollution in the countryside
- Reference should be made to the need to avoid flood risk areas and ensure there is no adverse impact on the natural environment in terms of increased river run off - Environment Agency
- Developers should be aware that SuDs may require dedicated areas of land for features like swales and ponds - Environment Agency
- There should be no unacceptable impact on natural environment from visual intrusion or disturbance to wildlife and habitats - Natural England
- Should make specific reference to Essex Landscape Character Assessment - Natural England
- Include encouragement to rebuild the fabric of the landscape - Natural England
- Should talk about the potential, improvements and enhancements to green infrastructure - Natural England
- Suggest policy is linked to the Essex Biodiversity Strategy 1999 - Natural England
- The policy should include the protection and enhancement of geo-diversity - Natural England

- Rivenhall Country Park will meet all the criteria in this policy
- It is considered that proposals for the Fritchway settlement meet this policy

Support

- Recognise that the natural environment is a significant asset and should be preserved.
- Supports protection of the environment and its aim to meet local recreational needs

In addition the following question was featured on the Have Your Say Questionnaire Form were related to the natural environment

Question 5: The local environment and historic towns and villages should be protected and improved.

Strongly Agree – 92

Agree – 32

Disagree – 2

Strongly Disagree – 0

Officer Comments

Braintree District has large areas of high quality agricultural land including at the periphery of the main towns. Agree that the wording of the 2nd bullet point in the policy should be changed from 'avoid the loss' to 'minimise the loss'.

Living landscapes is a scheme where the Wildlife Trust identifies key areas to protect for wildlife, enlarging, improving and joining them up across the UK: on nature reserves, in towns and cities, and in partnership with hundreds of other land-owners.

Renewable energy is dealt with in Policy CS3.

Agree that more specific reference to the protection, enhancement and management of biodiversity, environment and woodlands should be included in the policy.

Whilst PPS25 deals with flooding and flood risk, local circumstances are unique and so agree that a local policy on flooding and drainage should be included in CS2

Agree that an important role for the natural environment is as a recreational facility and that where it does not interfere with biodiversity requirements, access to the natural environment should be encouraged.

Aircraft flight paths are the responsibility of the Civil Aviation Authority and NATS (air traffic control) and as such the District Council is only a consultee.

Bullet points 4 -7 deal with ensuring development does not have an unacceptable impact on the natural environment from pollution, over extraction of resources and waste generation. It is considered that, together

with existing environmental health and Environment Agency legislation, they afford a high level of protection for the natural environment.

The Essex Landscape Character Assessment was completed in 2006 and provided a baseline inventory of landscape character for Braintree District, and the four other participating authorities. This report is part of the LDF evidence base and has been used to help decide where the new greenfield growth locations should be. Agree that reference to the findings should be made in policy CS2.

Green infrastructure is a strategic network of high quality green spaces and other environmental features which can include parks, playing fields, allotments and back gardens. They provide nearby access to nature and leisure areas for people and form wildlife havens, which can be used to mitigate the impacts of climate change, for example by being flood alleviation areas and can also contribute to local food production. Agree that green infrastructure is an important part of creating sustainable communities and access and improvement to the network should be included in policy CS2.

The Essex Biodiversity Action Plan identifies 25 species and 10 habitats which have been chosen as a focus for action. Each of these has a specific action plan attached to it which includes proposed actions and which agency will co-ordinate them.

Natural England defines geodiversity as the variety of rocks, minerals, fossils, soils, landforms and natural processes. Geodiversity has a crucial role in maintaining a range of environmental services and the complex relationships between geology, natural processes, landforms, landscape, soils and climate are fundamental to the distribution of habitats and species.

Recommendations;

That the following additional information should be included in Policy CS2;

- **Specific reference to flood risk and the sequential test**
- **To encourage improvements to green infrastructure**
- **Details of how the natural environment will be protected/enhanced**
- **Protection and enhancement of biodiversity and geodiversity.**
- **The Council will promote wildlife enhancements which will contribute to the habitat and species restoration targets set out in the Essex Biodiversity Strategy.**

Policy CS3 – The Built Environment

This policy deals with how the Council will promote the highest standards of design in new developments whilst respecting the historic context and highest areas of landscape sensitivity. It also aims to secure the maximum possible use of renewable energy, energy efficient building materials and waste recycling.

Objections

- Generic phrases such as ‘seek to encourage’ lack detail and commitment to achieve such aspirations
- An overarching climate change policy should be included in the document
- The Council should have an onsite renewable policy
- Development within village envelopes should be of a scale and density appropriate to the surrounding area - Gestingthorpe Parish Council
- The policy should not just apply to new developments - Essex County Council
- The reference to maximising waste facilities is welcome but it should be discussed how this will be achieved - Essex County Council
- Should be some guidance and targets for sustainable construction e.g. using the Code for Sustainable Homes ratings - Essex County Council
- A renewable energy target of 20% should be set for all sites in the District
- A policy on waste management, incorporating community waste reduction should be included – East of England Regional Assembly
- Core Strategy should show constraints and opportunities for renewable energy - East of England Regional Assembly
- Aims above the minimum Code for Sustainable Homes and BREEAM standards would be encouraged – East of England Regional Assembly
- Core Strategy should set local targets for renewable energy in new development and in accordance with paragraphs 31-33 of PPS1 Climate Change Supplement - Go-East
- The first bullet point should be expanded to include development adjoining or affecting the setting of important historic assets and the potential impact on archaeology - English Heritage
- Should be amended to note that sustainable construction requirements will be in line with the national programme
- Proposals for Dorewards Hall (an amber site east of Bocking Church Street) achieve this policy by protecting the highest levels of landscape sensitivity and preventing coalescence with Bocking Church Street
- Would like to see Village Design Statements in policy wording or accompanying text - Natural England
- Supports the requirement for high standards of design in all developments - Natural England
- CS3 is too prescriptive and should reflect the proposed timetabling for meeting the Code for Sustainable Homes
- Reference should be made to resource efficiency - Environment Agency
- Avoiding areas of flood risk should also be included - Environment Agency
- Some local contexts are not worthy of respect but the scale of local buildings is very important. There is room for good modern architecture that gives local surroundings due respect.
- Proposals for Fritchway Settlement will meet this criteria

- Policy should include design and layout of employment areas in order to provide high quality employment areas locations which will attract investors.

Support

- Support the balanced approach to development in the countryside - East of England Development Agency
- Support the strategy to ensure that development contributes to aspirations of a low carbon and resource efficient economy- East of England Development Agency
- Support this policy as Boxted Wood will be built to Code for Sustainable Homes level 6 and built to Lifetime Homes standards.
- The Rivenhall Country Park would include alternative energy supplies.

5.7-5.8 and CS3ALT1 and ALT2

This section gives alternative options to draft CS3 either by including references to regeneration initiatives in the main towns or by making the policy less prescriptive as national/regional policies already cover some issues.

Objections

- Support the suggested changes in ALT1 and ALT2 to reinforce Parish Plans and VDS

Support

- Agree there is a clear need for local policies and more detailed planning policies are needed, particularly with regard to sustainability issues.

In addition the following question on the Have Your say Questionnaire Form was related to the Built Environment

Question 5: The local environment and historic towns and villages should be protected and improved.

Strongly Agree – 92

Agree – 32

Disagree – 2

Strongly Disagree – 0

Officer Comments

Paragraphs 31 -33 of the Climate Change Supplement to PPS1 state that in situations where planning authorities could propose local sustainability requirements, they should be able to demonstrate that local circumstances warrant and allow this and specify achievement of nationally described sustainable building standards. It goes on to say that any local requirements for decentralised energy supply should ensure it is evidence-based and viable.

The Lifetime Homes Standard sets out 16 design criteria, which relate to both the interior and exterior of the home to create an accessible and adaptable house, for example that there should be a wheelchair accessible entrance

level WC with drainage provision, which allows a shower to be fitted in the future. To make the standard, homes must pass all 16 criteria.

The Code for Sustainable Homes is a standard for key elements of design and construction which affects the sustainability of a new home. The Code measures the sustainability of a new home against nine categories of sustainable design, rating the 'whole home' as a complete package. The Code uses a 1 to 6 star rating system to communicate the overall sustainability performance of a new home. The Government's Policy Statement "Building a Greener Future" sets out a progressive tightening of Building Regulations to require major reductions in carbon emissions from new homes to net zero carbon by 2016. In order to get there, the Government are proposing a 25% carbon improvement as compared to Part L of the Building Regulations in 2010 (Code Level 3) and a 44% improvement in 2013 (Code Level 4). Braintree District Council already requires Sustainable Code Level 3 for major developments.

On site renewable energy policy in the District is currently covered by Policy ENG1 of the East of England Plan, Carbon Dioxide emissions and energy performance which states that '*all development of more than 10 dwellings or 1000sq. m. of non-residential floor space should secure at least 10% of their energy from decentralised and renewable or low-carbon sources.*' However Councils can set higher standards if appropriate.

BREEAM (BRE Environmental Assessment Method) is a widely used international environmental assessment method for buildings. It sets the standard for best practice in sustainable design and is used to describe a building's environmental performance.

Targets relating to Lifetime Homes, BREEAM, Code for Sustainable Homes and onsite renewable energy policies should be included in the development control document.

Rivenhall Country Park will be considered during the preparation of the allocations document.

Recommendations

- **To include a reference to the protection of the setting of historic or important buildings.**
- **To include a reference to creating good quality built environments in commercial and business districts and public realms, as well as residential areas.**

1. Developing the Economy

Paragraphs 5.9 to 5.11 are the preamble to Policy CS4 (*Development of the economy in Braintree District*). This section of the Core Strategy looked at the future development of the economy of the Braintree District and how the Core Strategy will meet national and regional policies. It looked at the key economic issues and challenges for the District including regeneration sites, promoting

tourism, safeguarding existing employment sites, home working, delivery of jobs and a need to develop a specialist business/innovation park.

5. 9 Future development of the economy of the District.

Objection

- The core strategy should go further and should provide an employment classification and hierarchy not only to guide different scales and types of employment throughout the District but also to provide context for strategic and no strategic employment sites at the Site Allocation DPD.

Support

- No comments.

5.10 – What are key economic issues and challenges for the District?

Objection

- The retention of the Central Park, Halstead site for employment purposes is not realistic and is no longer fit for purpose. There is an opportunity for making better use of the site. The Core Strategy should therefore be flexible to enable more efficient use of sites such as this to enable a range of developments including mixed and residential use.
- A hierarchy of employment and classification of uses should be prepared in advance of decisions in Policy CS 5. Land allocations will not deliver rural jobs.
- The reference to the 'current review' of the District's Economic Development Strategy is vague and imprecise. If, as suggested, that Review will identify employment sites that are no longer fit for purpose. Surely, any conclusion as to the need for and size of any Greenfield Housing releases should await the outcome of that review.
- Countryside Properties PLC – As drafted, the Strategy is over reliant on existing allocated employment land and does not provide a qualitative assessment of this land properly reflecting its deliverability and suitability.
- Bullet points 4 and 5 needs to be updated. Whilst the principle to secure regeneration of major sites within the main town centre is supported the text continues '*...and in some of the Key Service Villages as a key element of the Economic Development Strategy*'. This is considered to be too vague and conflicting with other evidence in the Technical Support Supplement and Employment Land Review. Concern about impact for Crittalls which has already been acknowledged not a suitable site for major employment.
- Object to the first preference being a new innovation centre, that development of existing employment locations should be encouraged, in order to encourage new types of business to locate within Braintree.
- Industrial Trust – Disagree with Employment Land Review. Disagree with retaining Broomhills estate off Pods Brook Road. The area should be regenerated to make more efficient use of this land which has good accessibility to the town centre. This type of employment space is readily available elsewhere in Braintree District and there is no compelling reason to retain this particular industrial area.

- The aspirations concerning improving employment opportunities and home working in rural areas are not matched by opportunities in the spatial policies contained in the rest of the document, particularly in regard to policy CS1.

Support

- East of England Regional Development Agency – There are challenges and opportunities for Braintree District. How does the district relate to neighbouring engines of growth as identified? Are there any opportunities that arise from the proximity to Stansted? What will be the role of the District's three towns and numerous villages in the future? EEDA welcomes the approach being adopted in planning positively for the growth in East of England. However, whilst the core strategy document goes some way to addressing a number of the above issues, it could perhaps give greater consideration to the opportunities of the wider strategic issues.
- Countryside Properties PLC – Support aim of providing for up to 14,000 new jobs.
- Improvements to telecommunication to allow high speed broadband access are essential to attracting businesses to villages and to encouraging home working.
- Scott Wilson – Galliard Homes. The Boxted Wood sustainable community can contribute significantly to the goal of increasing employment land and jobs in the district.

5.11 Need to plan for 14,000 new jobs, regeneration of sites, safeguarding existing employment sites, business/innovation park.

Objections

- Barratt – The regeneration of Central Park site for employment/residential use provides an opportunity for making better use of the site. The Core Strategy should therefore be flexible to enable more efficient use of sites such as these.
- E Hobbs Ltd – The figure of 14,000 should be a target rather than a ceiling for the number of new jobs created. The figure of 14,000 should be at the forefront of strategy within its aims and objections.
- Industrial Trust – The wording needs to be strengthened in this paragraph. The Core Strategy should place a greater emphasis on the promotion of mixed use development, particularly in sustainable location such as Broomhills Industrial Estate.
- BDC (Community Services) – The statistics quoted in the report are out of date (some are 2001) and don't reflect the current economic profile of the District. Do not consider influx of migrants into Braintree District.

Support

- Bullet point 3. We support the possible identification of unsuitable employment premises for a mix of other uses.

Officer Comments

Central Park, Halstead

The above comments suggest that the Central Park, Halstead site *'is no longer viable'* and should be changed to residential /mixed use. The site is situated within the Town Development Boundary and is currently allocated as an 'Employment Area' on the Proposals Map of the Braintree District Local Plan Review 2005. A change of employment use to residential/mixed use would need to be considered during the Allocations Document stage of the Local Development Framework. However, a planning application for the site is due to be submitted imminently for a mixed use scheme of housing and employment. This proposal would be currently contrary to the Local Plan Review Policies which seek to retain existing employment sites.

Delivery of up to 14,000 jobs

The East of England Plan (Policy E1: Job Growth) outlines indicative targets for net growth in jobs for the period 2001-2021. An indicative target of 56,000 is identified for the local authorities of **Braintree**, Brentwood, Chelmsford, Epping Forest, Harlow, Maldon, and Uttlesford. Braintree District Council commissioned the 'Cambridge Econometrics' report which forms part of the evidence base for the Local Development Framework. This report presents an overview of the current economic position of the Braintree District and three visions for the economic future of the District to 2025. It concluded that the future number of jobs required in the District between 2005 and 2025 could range from **11,000 to 14,000**.

Braintree District Economic Development Strategy

The 'Braintree District Economic Development Strategy (2009 – 2013)' has been published for consultation and will be considered at full Council on 22nd June 2009 for approval. A review of the Strategy is due in 2011. The Economic Development Strategy is influencing the draft policies of the emerging Core Strategy, which will provide the development framework for the delivery of the Economic Development Action Plan. The Economic Development Strategy states that, *'some employment sites are no longer fit for purpose'*. However, The Economic Development Action Plan elaborates on this point defining the sites that are 'no longer fit for purpose' and states in paragraph 7.1 *'prepare development briefs for 'old' employment sites. Investigate the potential for promoting and delivering alternative employment uses including mixed use on the Crittall site at Silver End and Premdor site in Sible Hedingham for possible inclusion in future planning documents.'*

Employment Hierarchy

The East of England Plan (Policy E2: Provision of Land for Employment) states, '*sites of sufficient range, quantity and quality to cater for relevant employment sectors should be provided at appropriate scales in urban area, market towns and key rural centres*'. An employment hierarchy would complement the settlement hierarchy to guide both housing and employment development and enabling sustainable development (economic productivity, environmental sustainability and social amenity). A hierarchy policy would align with PPS 1 which gives priority to previously developed land for development over Greenfield land. National planning policy (PPS6) also requires local authorities to set out a hierarchy and network of centres to accommodate main town centre uses e.g. retail, office and entertainment. Uses such as these benefits from town centre locations as they are accessible and have the synergistic advantages of mixed use development. However, larger scale uses e.g. manufacturing and warehousing usually require good accessibility to the strategic roads and generally require more space. A hierarchy policy would identify sites of a range, quantity and quality appropriate for certain types of employment uses within the Braintree District. It would also promote economic diversity and business development in the main towns of Witham, Braintree and Halstead and the key service villages.

Broomhills Industrial Estate, Braintree

Broomhills is an established industrial estate and is identified on the Proposals Map of the Braintree District Local Plan Review as an 'Employment Area'. The comments above suggest that the Broomhills Industrial Estate would be more appropriate as mixed use development. The Employment Land Review refers to Broomhills and states, '*there is continuing demand for cheaper B2/B8 premises and no compelling reason for redesignation. It is currently in active use.*' It concludes that it should be retained for employment.

Recommendations – Paragraphs 5.9 / 5.10 / 5.11

- To include an 'Employment and Centre Hierarchy' policy within the Core Strategy.
- To provide updated reference to the Economic Development Strategy.
- To amend bullet point 3 to '*secure mixed-use regeneration of major sites in main town centres and in the Key Service Villages of Silver End and Sible Hedingham*'.
- To include reference to the wider strategic opportunities for Braintree District. For example, proximity to Stansted, expansion of A120.
- To include further reference to promoting 'home working'.
- To amend 5.10 to read, '*provide approximately 14,000 new jobs*'.
- To endeavour to use the most up to date statistics to reflect the current economic profile of the Braintree District taking into account migration.

POLICY CS4 – The Proposed Core Planning Policy in relation to the Development of the Economy of the Braintree District

Policy CS 4 summarises how the economy of the Braintree District will be developed and managed to broaden opportunities for business and secure delivery of employment land, protect and enhance tourist and visitor facilities, diversify and strengthen the rural economy.

Objections

- Braintree LSP Executive Group – Economic development – weak on community priorities ‘3 Towns’ regeneration should also be included.
- Essex County Council – whilst reference is made to reducing out commuting and broadening the skills of the workforce in the Policy, a clearer link is required as to how the proposed employment land allocations and distribution may assist this process. Reference should also be made to support for existing business to expand.
- Finchingfield & Cornish Hall End PC – No indication how the jobs envisaged are going to be created and a sense that the Council does not really know itself other than providing housing for an increasing commuter population.
- Cllr Abbott – needs to be more emphasis on sustainability.
- E Hobbs – Core Strategy should not merely state the priorities it will tackle, it should state how these issues will be addressed through spatial planning at strategic level. Wording of CS4 should be amended.
- Industrial Trust – Council should consider how existing employment sites are performing and where there is scope for regeneration to encourage mixed use development in appropriate locations as advocated in paragraphs 12 and 24 of draft PPS 4.
- CS4 appears to overlook the needs of the population of the District for access to outdoor leisure facilities for the use of the local population.

Support

- Braintree Association of Local Councils (BALC) - Endorses the four bullet points in the first paragraph of this policy.
- Mr Tann – Tanner site can support in deliverability for CS 4.
- Support objectives of broadening opportunities for business and to secure delivery of employment land in district.
- East of England Regional Development Agency – The approach to the levels and locations for employment growth as set out compliment the RSS and RES. Council is planning positively to not only promote new employment land within District but to ensure protection of existing employment allocations and to regenerate parts of the key towns.
- Countryside Properties PLC – There appears to be over reliance placed on allocated employment land in the Strategy some of which cannot be easily delivered. The risks compromising the economic prosperity of the District going forward.
- Galliard Homes Ltd – strongly supports development of the economy in Braintree. Boxted Wood sustainable community can contribute significantly to goal of increasing prosperity in District.

- Particularly reference to protection, enhancement and promotion of tourist development. Reference to Colne Valley Railway.
- Rivenhall Country Park in close proximity to Witham and A12 could assist in providing a balance between protecting the environment and additional employment land.

Officer Comments

As part of the evidence base for the Local Development Framework, Braintree District Council commissioned an Employment Land Review. This concluded that sites in current or recent employment use should continue to be retained, unless the site or location is unsuitable for modern standards of development, or the consequence would be a bad neighbour to adjacent sites. The report also recommended that provision should be made for an additional 3 – 5 ha of employment land per year throughout the plan period, with allocation of specific sites sufficient for 7 years development (i.e. 21-35 ha) at all times. The District Council aims to ensure that sufficient land is provided for employment in District to broaden the opportunities for business and secure delivery of up to 14,000 jobs and to provide opportunities for local employment, which could reduced the level of out commuting (*statistics indicate that 43% of people of working age travel outside the District to work*). The Employment Land Review recommended that *'consideration should be given to designation of a new business park site in the A120 corridor in the vicinity of Braintree to provide for new demand generated by airport related and other expansion at Stansted'*. The provision of a new business park site will contribute towards promoting the diversity of employment sites in the District and broadening the skills of the workforce.

Paragraph 5.32 identifies that regeneration initiatives should be based around Rayne Road / Panfield Lane area – Braintree, Land East of Town Hall Centre – Braintree, Newlands Centre – Witham, Land East of High Street – Halstead. The 'Three Towns, One Vision' proposals are actively working to promote and secure redevelopment.

Recommendations – Policy CS 4

- **To include further reference to the 'Three Towns, One Vision' regeneration proposals.**
- **To ensure that links are established in the preamble to the policy relating to the proposed employment land allocations/distribution and how this will reduce out commuting and broaden the skills of workforce.**
- **To include wording 'support for existing businesses to expand'.**

Alternative Options which can be considered (CS4 ALT 1 and CS4 ALT 2)

Policy CS4 ALT 1 – *Council could provide a lower annual level of employment.*

Objections

- Agree with Council's proposal to not adopt this. The take up rate of only 3 hectare per annum, as proposed, could already lead to a slowdown in the availability of employment land in the early years

Support

- But with the modification that the provision should be 60 hectares by deleting the 6 hectares at Rivenhall End. This then does not affect provision at Braintree. There is no need to seek a whole number of hectares per year.

Policy CS4 ALT 2 – *Council could provide a much higher level of job growth.*

Objections

- No comments.

Support

- Policy needs to ensure 14,000 jobs targeted for District can be delivered. Risk of failure: assumed take up is too low given market evidence, impact of opening A120 is not sufficiently accounted for; deliverability of sites and their suitability in qualitative terms is not properly assessed; the need to provide high quality strategic employment sites if significant inward investment is to be attracted is not taken into account.

Officer Comments

The Local Development Framework Panel on 20th May 2009 recommended that the proposed employment growth location to the north east of Eastways Industrial Estate in the Parish of Rivenhall be removed from the Core Strategy and the need for employment land recalculated, with any demand for land being met from an alternative site. The Council will consider these recommendations on the 22nd June 2009.

2. Distribution of Employment

Paragraphs 5:13 to 5:23 and policy CS5 were discussed at LDF Panel on the 20th May 2009.

3. The Rural Economy

This section of the Core Strategy looked at issues surrounding how to secure a sustainable future for the rural economy, whilst protecting the countryside environment, promoting tourism, regeneration of sites and minimising the use of cars for rural employment.

5.26

Objections

- No comments

Support

- Rivenhall Country Park would provide local jobs whilst bringing community benefits in providing a formal and informal education resource.

Policy CS6 – Proposed Core Planning Policy in relation to the Rural Economy of the Braintree District

Policy CS6 summarises how the rural economy will be supported by encouraging and facilitating sustainable developments.

Objections

- Braintree Association of Local Councils (BALC) – policy should include promotion of 'infrastructure' as a means of expanding the rural economy.
- Paragraphs 5.25.-5.26 refer to the debate of creating a more sustainable and self contained countryside. The content of policy CS6 is therefore capable of improvement as it does not contemplate specific allocations or refer to service industry or home working as relevant to the rural economy.
- Essex County Council – 1st bullet point – and will meet identified local need.
- 2nd bullet point – reference should be made to supporting appropriate diversification of rural businesses, other than agricultural holdings.
- 3rd bullet point – should be turned around to encourage and facilitate developments which provide sustainable forms of travel minimising impact on the local environment and road network.
- Essex Rural Commission to look into rural issues throughout County, this may contribute to the evidence base of the LDF and inform policy directions.

- Climate Change Manager – Policy appears to focus solely on previously developed land/buildings, diversification of agricultural and recreational uses appropriate to countryside. Need flexibility to create new (sustainable) developments to serve local employment in rural areas.
- EERA – No target for use of Brownfield land. Windfall Brownfield sites should be developed to their maximum potential where doing so remains consistent with other RSS policies.
- Councillor Abbott – Policy needs caution and should be reworded. Re-use can be supported but should be locally focused and small scale. Large retail uses or HGV depots are not appropriate.
- Suggestion to modify second bullet point by inserting words ‘outdoor leisure and’ in before the word ‘recreation’ in second line.

Support

- Great Bardfield PC – Support for homeworking contributes to viable communities. Require adequate parking for new developments.
- East of England Regional Development Agency – In line with PPS7. Encouraging and facilitating the rural economy subject to various parameters.
- GO East – Wording generally acceptable. Suggest removal of phrase ‘*will be supported by encouraging and facilitating*’ and therefore set out the text as wholly ‘criteria based’ and a positive form of expression.
- Rural Community Council of Essex – Endorse proposal for a Core Planning Policy focussing exclusively on needs of rural economy.
- Natural England – Acknowledge wording states rural developments should respect and reinforce local character and have acceptable impacts on local and wider countryside.
- Large equestrian facilities should be subject to careful planning control.
- Supported – in particular reference to encouraging and facilitating development that helps towards promotion and viability of recreation uses.

Officer Comments

The Local Plan Review does not have a policy identifying a target for the use of previously developed land. The East of England Plan (Policy SS2: Overall Spatial Strategy) states that the, ‘*target is for 60% of development to be on previously developed land*’. However, it further states in paragraph 3.12. ‘*The regional target for re use of previously developed land should be monitored in relation to housing and employment development. The extent to which the 60% target is achieved will vary across the region.*’ The Annual Monitoring report produced yearly by Braintree District Council tracks development on previously developed land and can determine whether the regional target is being achieved.

Recommendations – 5.26 / CS 6

- Include reference to the 'Infrastructure Study' which will demonstrate delivery of the employment growth sites.
- Include reference to the promotion of 'home working' in CS 6.
- Amend bullet 1 to include '*and would meet identified local need*'.
- Amend bullet 2 to include '*support appropriate diversification of rural business other than agricultural holdings*'.
- Amend bullet 2 to include 'outdoor recreation'
- Amend bullet 3 to read '*encourage and facilitate development which would provide sustainable forms of transport, minimising impact on local environment and road network*'.
- Refer to the 'Essex Rural Commission' findings to support the evidence base.
- Investigate the possibility of having a target for use of previously developed land.
- Remove '*will be supported by encouraging and facilitating*' to provide text as wholly '*criteria based*' and positive forms of expression.

Alternative Options which can be considered (CS6 ALT1 and CS6 ALT2)

Policy CS6 ALT1 – *Propose either a stricter or less strict policy but either approach would risk being contrary to national and regional policies in terms of potential impacts on the countryside environment, and achieving sustainability particularly in travel terms.*

- No comments

Policy CS6 ALT2 – *Specific policies for the rural economy could have been included in the Core Planning Policy in relation to Promotion and Development of the Economy of Braintree District. The importance and extent of rural areas in District suggest that a separate Core Planning Policy should be preferred approach.*

Objections

- No comments

Support

- Give consideration to a more comprehensive policy for the rural economy based on employment classification and hierarchy.

5.29 – Priorities for Town Centres and Regeneration.

Objections

- No comments.

Support

- Point 4 Town Centres and Regeneration – supported where it states regeneration of Key Service Villages is considered to be highest priority together with market towns.

5.30, 5.31

- No comments received.

5.32 Regeneration Initiatives

Objections

- The IFF site, in north of District, south of Long Melford should be designated as a 'Special Regeneration Area' in the Core Strategy.

Support

- English Heritage - keen to understand nature of proposals in Sible Hedingham and Silver End. Particularly Crittall factory (Silver End). RSS policy ENV6 refers to strategic importance of factory villages.
- Important to recognise and commemorate historical value of Crittalls in Braintree District in regeneration proposals for Silver End.
- Support acknowledgement of regeneration of Crittall site, Silver End.
- Garden Field in Silver End should be considered as redevelopment site in conjunction with Crittalls site.

Officer Comments

The former International Flavours and Fragrances (IFF) industrial premises is south of Long Melford and closed in 2002. It is partly in Braintree District, in the parish of Liston, and partly within Babergh District. This site is not suitable as a residential led redevelopment because;

- The site is in a remote rural position with poor access. Development here would be unsustainable in transport and accessibility terms
- Large parts of the site are at risk of flooding and lie within Flood Zones 2 and 3
- The site is contaminated
- The site straddles the border between Braintree and Babergh District Councils and as such any comprehensive redevelopment on the site would require the support of both councils
- The site will be considered in more detail at the Allocations Document stage of the Local Development Framework.

- The Garden Field site, Silver End is situated to the south east of Silver End and is not related physically to the Crittalls site. The site will be considered during preparation of the Allocations Document.

Recommendations – CS6 ALT 1 / 2, 5.29, 5.32

Ensure that English Heritage is involved throughout the proposed regeneration proposals for Sible Hedingham and Silver End.

Policy CS 7 – Relation to Town Centres and Regeneration

Policy CS 7 summarises how the economic development will be promoted and secured in accordance with broad priorities.

Objections

- Mid Essex Primary Care Trust – Support principle of policy but object to detailed wording in clause 6 as it is considered to be incomplete. Currently states 'The promotion of mixed use developments.' Revision to include, '*The promotion of mixed use developments incorporating services and community facilities provision*'.
- Point 4 ('The designation and development of new employment locations.') is not clear or comprehensive as the geographical expression of such proposals is almost entirely confined to existing sites or growth areas.
- Tesco – Regeneration schemes at Rayne Road/Panfield Lane and land east of Town Hall Centre do not accord with 2.28-2.51 (site selection and land assembly) of PPS 6.
- Mr Bolter – Need a plan which allows development to provide new employment (but not in warehousing/transport), includes provision for properly located community facilities and which allows no new areas of housing.
- More shops, services and facilities should be provided in Sible Hedingham.
- Essex County Council – lack of core planning policy regarding a retail hierarchy. No indication provided regarding any proposed hierarchy of retail centres in District, as required in policy E5, East of England Plan.
- Object to wording which is unclear. Bullet point 2 ('The safeguarding of existing employment sites') makes no reference to paras 5.10 and need to offer high quality employment opportunities. Bullet point 4 ('The designation and development of new employment locations') makes no reference to Review of District's Economic Development Strategy.
- Policy should include update of Employment Land Review and completion of Economic Development Strategy.
- East of England Regional Development Agency – supports policy but suggests more emphasis on importance of place making and quality development in policy, or through Area Action Plans, or other Supplementary Planning Documents. Inspire East useful resource.
- Go East – Policy wording is generally acceptable although it still amounts to a 'statement of intent' in that it is not clear how the development will be 'promoted and secured'. Intentions cannot be relegated in their entirety to Allocation DPD and SPD. The 'broad location' information in paragraph 5.32 would be better placed as part of policy wording. Core Strategy should outline amount of new retail floor space required over the plan period and its broad distribution.
- English Heritage – important for plan to provide support for regeneration within urban areas.

- Wording of policy is not considered to be clear and precise and could be viewed as misrepresenting other evidence and parts of the strategy.
- Councillor James Abbott – sustainability should be built in.
- Bullet point 6 should be amended to include, *'promotion of mixed developments, where in the case of locations to immediate edge of primary shopping areas there is scope to increase retail floor space and extend the current retail frontage'*.
- In addition to regeneration of key sites in town centres, core strategy should look to regeneration and expansion of existing employment sites that are performing well in District i.e. Earls Colne Business Park.
- The Industrial Trust - proposals to amend the policy and seek to build on Council's objectives of reducing barriers to employment and create new employment opportunities by enabling mixed use and residential development. Need to positively promote regeneration of sites in close proximity to town centres, which currently detract from appearance and function of town centre.

Support

- The future of small shops should be considered when planning and redeveloping town centres.
- Support development of town centres for future retailing.
- Sible Hedingham Parish Clerk – support needed to improve town centres, shopping, leisure and cultural facilities in Braintree and Witham.

Policy CS7 ALT 2 – *Maybe a case for setting out more detailed policies for these priorities in the Strategy rather than leaving them to the later plans.*

Objections

- There should be more detail set out with regard to the provision of a doctor's surgery on the Premdor site. Sites at Tanners Dairy, Coopers Yard and the cinema site, Sible Hedingham should also be considered for regeneration area designation.

Support

- No comment

Officer Comment

Following the useful comments above, it is clear that further work is required on the whole section of town centres/regeneration to provide a comprehensive and clear policy, demonstrating how the development will be promoted and secured. A separate retail hierarchy policy is also required and reference needs to be added to the Economic Development Strategy.

Recommendations – Policy CS 7 / CS7 ALT 2

- Amend bullet 6 to include *'promotion of mixed use development incorporating services and community facilities provision'*.

- Remove bullet 4 (the designation and development of new employment locations) as such proposals are confined to existing sites and growth locations.
- Produce a separate 'retail hierarchy' policy for the Core Strategy, to meet policy E5 of East of England Plan requirement that the Core Strategy should include a proposed hierarchy of retail centres in the District.
- Include the amount of new retail floor space required over the plan period and its distribution.
- Amend wording to include, '*SPDs may also be produced to set out requirements for some sites in more detail and to emphasis the importance of place making and quality development*'.
- Include paragraph 5.32 which defines the '*broad location information*' as part of the policy.
- Take the revised section on 'town centres and regeneration' back to LDF Panel at a future date for approval.

Policy CS8 – Housing Provision and Delivery (Includes paragraph 5.69, 5.72 to 5.76)

Objections

- Building in key service villages through use of Brownfield sites will result in cramped development
- Development in other villages should be contextual and not rule out development of market housing on the periphery
- Smaller villages should be considered for development
- Concern that growth is mostly identified through the Urban Capacity Study
- Development on smaller town sites periphery should also be considered and a pragmatic approach to infilling of developed sites which are currently outside development limits.
- Larger houses would attract more affluent people who require less support from the Government
- We need some tasteful multi-level parking in Witham.
- Suggest rewording the policy to deal with the provision of infrastructure required by such development
- Growth in housing should be linked to job creation
- Policy is unclear on certain aspects, special needs housing in addition to gypsies and travellers should be included (Elderly/mental care).
- Policy should be split in two (Location and phasing of housing/Housing need) a revised spatial policy statement would provide a clear consistent steer for preferred development location priorities. (ECC)
- Affordable Housing and high quality designed environments area key objectives and should warrant there own policies. (ECC).
- Greater clarification for identification of development sites within the Spatial Policy needed. i.e. definition of local need and basis and objectives for selection of regeneration sites.
- A tighter policy required on replacement homes in the countryside should be considered.

- References to the East of England Plan should not appear in CS8 policy wording.
- As drafted current strategy may yield insufficient growth and is not flexible
- No housing development should take place as currently services cannot cope.
- The strategy should make it clear that some sites adjacent to urban areas may be suitable for development.
- Delete growth locations at Forest Road
- Greater emphasis on the provision of green infrastructure linking with a wider network of green infrastructure.
- Reference should be made to exception sites that do not necessarily accord with the settlement hierarchy
- Sustainability trap will limit growth in “other villages”
- Various alternative site submissions and objections to proposed growth locations.
- Greater flexibility should be allowed for development in other villages
- Halstead should have a growth location identified north west of the town
- Suggest alternative growth location at Boxted Wood
- All greenfield growth locations should be in Braintree.

Support

- Support the principle of the policy
- Support providing there is a review of development limits
- Support the principles within the policy especially in respect of providing new housing development within Key Service Villages
- Support densities which are appropriate to the character of the area
- Support 1st, 3rd and 4th parts of CS8.
- EEDA welcomes the proposed distribution of new housing in the District as set out in Policy CS8. (EEDA)
- Support for new homes being designed to Lifetime Homes Standards. As such all homes in Boxted Wood will meet these standards including 10% with wheelchair access.
- Support for the highest possible standards of design. The Boxted Wood sustainable community will meet or exceed standards outlined in by CABI.
- Strongly supports the co-location of services in order to increase accessibility. The Boxted Wood sustainable community will provide a full range of services and facilities including employment within the settlement boundary.

Officer Comment

Proposals for site allocations will be dealt with under Allocations DPD. In terms of provision of special needs housing for elderly/mental care units, it is more appropriate for a policy to be included within the Development Control Policies document as we do not have a regional requirement to identify sites for rest homes.

Rural exception sites are affordable housing sites, which are currently allowed adjacent to development boundaries in smaller villages subject to a number of criteria. These sites are intended to meet the affordable housing needs of that village and the number of units provided is determined by a housing needs study. Criteria for rural exception sites will be outlined within the Development Control DPD.

It is perceived that not allowing development in “other villages” will result in a sustainability “trap”. This is a misconception that assumes that only market housing can deliver improvement to service provision. Allowing unrestricted market housing in these locations will create even more unsustainable communities. It is intended that development allowed in these areas would only be what is needed to meet local need, as it would be inappropriate to allow larger scale developments in these locations.

It has been suggested that land north-west of Halstead should be identified as a growth location. The issue of growth locations has been covered early under paragraph 4.19 page 35 of the Core Strategy. Members have agreed to concentrate growth in Braintree and Witham.

Recommendations

Add reference to development boundary review to preamble. Remove reference to the East of England Plan from the policy.

The policy should be split into parts covering each subject. The Spatial Policy part of the policy should be merged with Statement 1 and the table at paragraph 4.42 to form an all encompassing spatial policy. A separate policy should be drafted for affordable housing and Gypsies and Travellers.

Include the final part of the policy on design issues as a Development Control Policy.

Further work will need to be carried out to assess the viability of the Lifetime homes standards and the percentage of new build dwellings which should meet this standard.

Policy CS8 – (Affordable Housing) and paragraphs 5.40, 5.43, 5.44 – 5.45, 5.48 and 5.50

Objections

- 40/60% ratio for affordable housing is too high, small developments of 5 or 6 units should be exempt
- Opposition to the imposition of affordable housing in rural areas, housing should be low density, hamlets need to be defined and not treated as in the countryside for planning purposes.
- Policy should refer to affordable housing for local need
- 30% too low a target for affordable housing

- Flexibility needs to be included in the policy as 30% affordable housing is not always feasible, or where none is required when no demonstrated need exists.
- Higher densities would be required in certain cases to provide for affordable housing
- A maximum of 35% affordable housing should be applied
- Further justification and supporting evidence is required for the affordable housing policy.
- The proposed affordable housing strategy is unrealistic and should be fully reviewed.
- Provision of a high level affordable housing is likely to be a significant deterrent on delivery of the housing growth required in the District. The Council should seek contribution by negotiation
- 40% may cause delivery problems for sites.
- Affordable housing should not be subsidised by private housing.
- Priority for affordable housing should be given to young professionals and families
- Current social housing provision is not working
- It is important for a Core Strategy to set out a strategic housing trajectory, expressing the Council's broad expectations for the delivery of housing over the Core Strategy period.
- We do not consider it is appropriate for the Council to suggest a preferred option in relation to affordable housing until it has undertaken a viability assessment of options.
- Shelter considers that the proposal in paragraph 5.60 that the tenure split should normally be 70% social rented and 30% intermediate tenure should be formally incorporated in the Policy.

Support

- Proposed threshold for affordable housing is supported (Go-East)
- Proposed threshold for affordable housing is supported, a tariff should be charged for sites below 5 units (Shelter)
- Support provision for smaller scale developments to cater for local affordable housing need (RCCE).
- The proposed document is mutually supportive with the Council's draft affordable housing strategy.
- We agree that the Council's evidence base shows a need for more affordable housing in the District.
- Support the provision of suitable housing sizes, locations and tenure to meet the needs of Braintree District Council.

Officer Comment

Policy H2 of the Regional Spatial Strategy promotes a figure of "some" 35% being appropriate for affordable housing. It also allows for higher provision in areas with more need for affordable housing. Braintree District Council's Strategic Housing Market Assessment indicates that the District requires a significant proportion of its housing to be affordable and as such a higher

percentage can be justified. Providing an upper limit for affordable housing contributions is not appropriate as a viability assessment could show a site being capable of providing more than 35%. Also other housing targets are considered to be minimum figures rather than maximum figures and having a percentage cap would be inconsistent with this approach. Further work is being carried out to assess the viability of the affordable housing threshold and percentage by the Three Dragons Consultancy. The results of this work should be available in September and will be reported to the LDF Panel. (The Three Dragons is a consultancy, which specialises in research between housing and planning policy and they have developed a tool kit to assist in assessing the viability of residential schemes in order to ensure the provision of affordable housing. It was originally developed by Three Dragons Consultancy and Nottingham Trent University to assist the Greater London Authority. The tool kit is being adapted for use by other local authorities for the same purpose.)

The Council intends to use viability modelling to determine whether a developer is proposing suitable contributions for a site on a case by case basis, whilst seeking reasonably to maximise affordable housing to meet the significant need for affordable housing identified in the area by the SHMA.

The Council's Strategic Housing Market Assessment (SHMA) is a wide ranging document that looks at a series of housing issues including affordability. This document is part of the evidence base produced to support the Council's Local Development Framework. The report identifies Braintree's affordable housing need as being 697 units per annum.

A housing trajectory is provided within the Council's Annual Monitoring Report which is updated annually. It provides a detailed projection for housing delivery within the District up to 2025. This document provides an accurate picture of projected housing delivery over the Plan period. This will be updated and extended to 2026 and included within the Core Strategy. It is likely that any figures provided in the Core Strategy in terms of smaller sites (Windfall/UCS) would become out of date relatively quickly depending on the unpredictable circumstances of the housing market.

The provision of a wide range of housing types is one of the principles advocated in PPS3 – Housing. This allows for housing suitable to the needs of all members of the community. The Council will be pursuing this approach in its proposed growth locations. However it is not proposing to support the Boxted Wood eco town, instead directing the majority of growth to Braintree and Witham.

The eventual level of affordable housing that a site can provide would be determined in accordance with policy and its viability would be tested through the application of the 3 Dragon's viability model. The percentages indicated in the preamble seek to illustrate the level of affordable housing the District requires in order to address the shortage of affordable housing in the area. It is likely that sites with fewer constraints would be capable of providing higher levels of affordable housing.

The percentage split of social rented and intermediate tenure can be negotiated through s106 agreements. Having the percentage in the preamble to the policy allows for greater flexibility, although the Council would still seek the majority of affordable units to be social rented. Having the percentage within the policy would potentially duplicate government policy, where as having it in the preamble allows the Core Strategy greater flexibility.

Recommendations

Add wording to preamble of policy to reflect the use of viability modelling when determining suitable affordable housing contributions for sites. Add reference to affordable housing provision to meet identified local need.

A supplementary document to accompany the Core Strategy will outline the number of housing units to be produced by growth locations and SHLAA sites. This document will also outline the phasing of proposed development for these areas and sites.

To include the Housing Trajectory, up to 2026, within the Core Strategy.

Policy CS8 - (Gypsy and Travellers and Travelling Showpeople) includes comments on paragraph 5.62-5.66

Objections

- The policy in its current form does not meet the requirements of Circular 01/2006, in particular paragraph 31. (Go-East)
- The requirement to provide 16 pitches in the District by 2011 is acknowledged, but as not yet directly reflected in policy. (EERA).
- This issue warrants a separate policy (Go-East)
- It is a requirement to set out criteria for the location of Gypsy sites within the District. (Cambridgeshire County Council).
- The core strategy will have to include a policy for Gypsy and Traveller sites to not only deliver the Regional Spatial Strategy requirements, but also to meet unexpected demand. Mechanism for delivery of sites should be included.

Support

- None

Officer Comment

It is necessary to change the section on Gypsies and Travellers to reflect guidance in Circular 01/2006. Under this guidance it is necessary for the Council to set out criteria for the selection of sites to meet allocation requirements and to determine applications for sites which come forward

throughout the plan period. These policies must be fair, reasonable, realistic and effective. Policies that rule out or place undue constraint on sites are not to be included within DPD's.

The actual requirement for gypsy and traveller pitches in the District is currently being determined through the single issue review of the Regional Spatial Strategy.

Recommendations

Create a new policy for Gypsy and Traveller Provision, including a selection criteria for the allocation of sites to be used in the Allocations DPD and for determining any subsequent planning applications. This should include travelling show persons need. Further consideration is needed to determine what criteria should be included within this policy.

Add to preamble reference to the delivery of Gypsy and Traveller sites through s106 contributions.

Alternative Policy Approaches

Option CS8ALT 1 – No comments

Option CS8ALT 2 – No comments

Option CS8ALT 3 – No comments

CS 9 The Proposed Core Planning Policy in relation to Services and Facilities (paragraph 5.79 to 5.95)

Objections

- Object to detailed wording in clause 6 as it is considered to be incomplete.
- Rural development should be restricted to what is needed and should not damage the environment.
- What action is being taken about the A12
- The business community is pessimistic about the ability of other authorities to provide services to meet or even follow demand in a timely manner (e.g Braintree Hospital).
- Further information needed re infrastructure provision and delivery. (CBC).
- Support policy in general but the Core Strategy should not promote the Community Infrastructure Levy until it has been approved by Government. Change text to reflect this.
- Braintree hospital could have too small a capacity before it is even completed given amount of new growth.
- Development should follow the required infrastructure.
- The provision of high speed broadband access across the District should be part of area-wide infrastructure planning.
- Requirements should be in line with Government guidance on planning obligations and the CIL in order to ensure there is no unfair burden

placed on developers and that there is not any duplication of contributions.

- Policy CS9 is a statement of intent and does not indicate how the Council will work with the partners and what the priorities will be for directing major services and facilities to the locations indicated. No detailed criteria set out on how to resist loss of services and facilities. What does evidence base reveal about existing shortfalls? (Go-East).
- No opportunity for smaller villages to grow if no market development is allowed in other villages.
- Developer contributions need to deliver infrastructure as well as ensuring development is able to come forward.
- Would like provision of residential care home in Coggeshall
- Remove “as far as is realistically possible” in second bullet point in 5.95 as it is not needed.
- An additional bullet point should be included referring to the provision of community and leisure facilities and open space at Rivenhall Country Park, located on land to the north east of Witham, south of the A12.
- Panfield Lane cannot deliver new football stadium
- Evidence base does not show how college campus could be delivered
- Panfield Lane would result in the possible loss of sport and recreation contrary to PPG17
- Open space requirement for Rivenhall would have to be removed if growth area deleted.
- We feel the second bullet point here needs to include reference to village/community halls and the important contribution they make as a focal point of community life in rural areas. They also contribute to service delivery.

Support

- Support provision of wireless broadband networks to support home and work.
- Support objectives of policy in terms of rural areas. Allowing small scale mixed use development will meet these objectives by improving existing services.
- Essex County Council welcomes the opportunity to work with BDC in providing for the future needs of the community at a number of locations within the District. (ECC)
- Support for the broad thrust of the policy.
- Improving leisure facilities will help attract employees.
- Support the policy, expresses a need for services in Key Service Villages such as Sible Hedingham.
- Major development should not go ahead without necessary infrastructure.
- We consider that the delivery of the development at Rivenhall Country Park would directly contribute towards this.

Officer Comment

The Community Infrastructure Levy was introduced as part of the Planning Act 2008, which received Royal Assent in November 2008. CIL empowers but does not require Local Authorities to charge a CIL on most types of development. The size of the charge will be based on a formula which relates to the size and character of the development paying it. A consultation on regulations took place in 2009 and it is anticipated that the regulations will be in force in 2010 before the Core Strategy is adopted. It is therefore appropriate for the Core Strategy to contain the CIL in policy CS9.

An infrastructure study is being carried out which will help determine, which areas of infrastructure have shortcomings.

Setting out criteria for how the Council will resist the loss of services would be more appropriately located within the Development Control DPD.

Having development before infrastructure may not always be possible. In these circumstances phasing development would be appropriate to ensure funding is available to provide sufficient infrastructure is in place to enable the successful completion of a development.

The strategy acknowledges that it seeks to retain services and facilities in villages. It is however necessary to recognise that this may not always be achievable. The current wording reflects this.

The provision of a care home facility in Coggeshall can be dealt with through the Allocations DPD.

It is more appropriate to deal with the proposed Rivenhall Country Park through the Minerals Subject Plan and the Allocations DPD.

Recommendation

Add definition of CIL to CS8. Add detail of how BDC will work with partners and what priorities it has for infrastructure development. Add reference to phasing of development to allow for sufficient infrastructure to be provided.

A definition of the types of infrastructure to be provided by the CIL will be drawn up following further discussion with service providers and presented to the LDF panel at a later date.

Add reference to village community halls to bullet point 2 paragraph 5.79

Part 6 – Delivering the Strategy 6.1 – 6.58

This chapter of the document deals with how the strategy and core planning policies will be delivered. It sets out the organisations who will be involved in the delivery and their responsibilities.

Objections

- A clearer strategy is required to capture the development gain and Community Infrastructure Levy (CIL) issues. Essex County Council would welcome the opportunity to assist with the identification of key streams of infrastructure to support the strategy - Essex County Council
- The Delivery Plan is required to identify key pieces of transport (and other) infrastructure, be they locally or regionally significant - Essex County Council
- The Strategy should set out who, what, where, how and when the Council's vision and objectives will be delivered, the key dependencies and any contingencies - Go-East
- A strategic housing trajectory should be included - Go-East
- The role of Parish Councils in partnership working should be better recognised - Sible Hedingham Parish Council.
- Support the recognition of the roles of Parish Plans and Village Design Statements (VDS) and request that Neighbourhood Plans should also be recognised - Rural Community Council of Essex
- Community led projects are vital and it should be a statutory requirement that VDS are incorporated into planning consultations and decisions
- Does a Braintree District Local Area Agreement exist?
- When considering employment sites, thought should be given to moving present problematic sites
- Object to paragraph 6.33 as whilst regeneration areas will provide some employment, allowing regeneration of existing employment sites can continue to improve the employment profile of the District
- Support the principle in paragraph 6.49 but ask that health care be added to the list - Mid Essex Primary Care Trust
- Paragraphs 6.5-6.53 do not fairly reflect the current legal position regarding planning obligations and CIL. Changes are wording are suggested to reflect this.
- Detailed provision is not currently in place for CIL and it is entirely possible that it could be altered or abandoned before it is ever implemented. Until then guidance is contained in Circular 05/2005.
- There is clear repetition between paragraphs 6.54 -6.58 and 6.49-6.53
- The location of the library at Witham is poorly located for the town centre and could be considered for relocation if the prospect arose - Essex County Council

Support

- BALC supports the proposals for co-operation between all levels of councils to achieve delivery especially with the County Council.
- Pleased to see Parish Plans and VDS are included. Their purpose is to ensure residents views are taken into account
- Strongly support the recognition of the role of the voluntary sector in service delivery - Rural Community Council of Essex.

- Local people best understand their areas and Parish Plans and VDS play a vital role in obtaining the majority view of a particular area.
- We agree with paragraph 6.32 that it is important for the Local Planning Authority to allocate suitable sites for economic development
- The possible relocation of Braintree College to the growth location west of Panfield Lane would give the opportunity for a 'Learning Hub' including Adult Learning which does not currently have a base in Braintree - Essex County Council
- Library services in the villages are satisfactory but could benefit from multi-agency partnerships and co-location - Essex County Council
- No new primary or secondary school will be required but additional places may be required at existing schools - Essex County Council
- We would welcome the opportunity to acquire around 2.1ha of land for the possible extension of Tabor High School - Essex County Council

Officer Comments

Witham library is located inside the defined town centre boundary and is accessible by a range of transport modes.

The suggested relocation of Braintree College to the growth location west of Panfield Lane will create opportunities for the enhancement of further education facilities across the District. A masterplan will deal with these issues in more detail.

A masterplan for land to the west of Panfield Lane will include Essex County Council's request for land on which to extend Tabor High School.

Recommendations

- **Paragraphs 6.49 – 6.53 and 6.54 - 6.58 should be merged to avoid repeating information**
- **That a list of identified infrastructure required to support the growth plans laid out in this document is included**
- **A strategic housing trajectory should be included in the document**
- **More detailed information on the Council's position of CIL should be included in the document**
- **The delivery plan should include details of dependencies and contingencies where appropriate**

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