

Agenda Item 5

Report considering representations received during public consultation on the One District-One Vision Core Strategy, relating to the proposed growth locations .

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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: Potential 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/agree the recommendations set out in the report relating to wording of the Core Strategy and the Growth Locations.

Not to approve/agree the recommendations set out in the report.

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 considers objections and comments in support of the proposed growth locations in the One District- One Vision Draft Strategy for People and Places in the Braintree District to 2025.

It recommends that the following growth locations are included in the Core Strategy to be submitted for Government approval:-

- Land west of Panfield Lane, Braintree
- Land west of the A131, Great Notley
- Land south-west of Witham off Hatfield Road (600 dwellings)
- Land north-east of Witham (300 dwellings)

It recommends that two areas are excluded from the Core Strategy:-

- Land east of Panfield Lane, Braintree (currently used for open space)
- Land north-east of Witham, adjacent to Eastways (that was proposed for employment).

Introduction

The LDF Panel considered comments received during the public consultation on the first part of the Draft One District- One Vision Core Strategy (up to paragraph 4.29 Option ALT7) at its meeting on 15th April.

This report considers the comments received during the public consultation in relation to the proposed growth locations, from paragraph 4.30 to CS5 ALT3 (excluding CS1-4). The LDF Panel are being asked to approve changes to the wording of the Core Strategy and to make recommendations to the Council concerning the growth locations.

The Council will be asked to approve the whole of the Core Strategy in due course, when it has been revised in accordance with the changes approved by the LDF Panel, prior to the document being submitted to the Government for approval.

However, it will be necessary to prepare further evidence on the infrastructure requirements for the proposed growth locations, prior to submission. It is therefore considered important for the LDF Panel to make recommendations to the Council on the growth locations, as soon as possible, to ensure that this further work can be carried out.

The remaining comments, relating to CS1-4 and paragraphs 5.24 to the end of the document, including meeting the housing requirement and alternative growth location proposals, will be considered by the LDF Panel on June 17th.

The majority of comments received about the growth locations were made to Policy CS5, Policy CS8 and Statement 1. However, comments were also noted in other sections of the 'Draft Strategy for People and Places in the Braintree District to 2025' document and on the Have Your Say Form. All of these comments are summarised and discussed below.

Part 4 – Planning for the Future Growth of Braintree District (continued)

The Growth Locations in Braintree and Witham-whereabouts will they be?

Paragraphs 4.30 – 4.34 are the preamble to Statement 1 and include details of how locations have been assessed and why some have been rejected.

Objections

- Further factors than those set out in 4.31 should be used to examine growth locations, including impact on existing use and sports recreation provision
- For consistency access to water and sewage systems should be included in the list – Environment Agency

- Information in the technical supplement gives no indication of weighting and scoring of the sites in relation to criterion in paragraph 4.31. We do not consider the content of the plan justified by robust evidence base
- A link should be included to the further analysis in the technical study and include reasons for not progressing locations – Essex County Council
- Paragraph 4.33 should be balanced by a statement which sets out why Panfield Lane and other options have been chosen and how the identified constraints will be mitigated for.
- Rejection of development areas because of uncertainty over the future expansion of the A120 seems an unreasonable approach
- Object to paragraph 4.33 as we consider the potential reasons for rejecting alternative growth locations in Braintree are limited.
- It is not correct to say the rejected options are unacceptable to the Highways Authority. Rather that Highways Agency preference is not for these sites as they may incur significant levels of impact that may be difficult to mitigate without significant investment – Highways Agency
- Is statement 1 a policy?
- Suggest Straits Mill industrial site be moved elsewhere
- Landscape and Transport Reports show that the identified constraints at Dorewoods Hall can be overcome.

Support

- Pleased to see that flood risk has been considered – Environment Agency

Statement 1 Proposed Growth Locations
<ul style="list-style-type: none"> • Land to the north-west of Braintree-off Panfield Lane • Land to the west of the A131 at Great Notley • Land to the south-west of Witham-off Hatfield Road • Land to the north-east of Witham-off Forest Road in the parish of Rivenhall • Land to the north-east of Witham (adjacent to Eastways/Waterside Park)

Objections

- We feel statement 1 should actually be part of the wording of a policy – Go-East
- All growth locations should be assessed for their impact on important archaeological sites and Parks and Gardens – English Heritage
- Having 2 large urban extensions presents twice the problems and could be costly and unviable.
- Concerned that the Core Strategy does not take into account planning issues around the future growth of Haverhill – St Edmundsbury Borough Council

- Priority should be given to modernising Broomhills and Springwood Industrial Estates rather than creating new ones.
- Suggest you explore the option of building houses off Cressing Road
- Earls Colne Airfield should be included as a managed employment growth location.
- An additional growth location should be added at land north east of Witham and south of the A12 for a country park.
- Boxted Wood new settlement should be included as a growth location
- Dorewards Hall should be included as a growth location because of its good sustainability credentials
- Land at Hayswood Farm, Great Notley should be included as a growth location
- Rayne Lodge Farm should be included as an employment growth location
- Favour the dispersal of new developments across the District

Support

- Pleased that the proposed growth locations avoid the environmentally sensitive areas of nature conservation and flood zones – Environment Agency
- Support placing the majority of new development in Braintree and Witham with their advantages of rail, A120/A12 links and town centre facilities – Gestingthorpe Parish Council
- Against any development at Pods Brook Road

Officer Comments

At this meeting, the LDF Panel will agree recommendations to the Council on which growth location options it supports, together with the levels and types of growth in each location. It is not yet in a position to rule out the need to consider alternative or additional locations, including those set out in response to Statement 1, until the amount of housing provision likely to come forward from urban capacity sites becomes clearer. The results of the Strategic Housing Land Availability Assessment will assist in determining the level of provision from urban capacity sites. This will be considered at the LDF Panel meeting on 17th June, together with the Sustainability Appraisal of the draft Core Strategy. The need for alternative or additional growth locations, including those set out as objections to Statement 1, will therefore be considered at the next LDF Panel on 17th June.

The following recommendations are made in response to objections to Statement 1:-

Recommendations

**To include Statement 1 within the growth location policy.
To expand the factors used to examine the growth locations and to set out reasons for rejecting sites.
To take account of the planning issues relating to the growth of Haverhill.**

Land to North West of Braintree - off Panfield Lane

The Draft Strategy proposes mixed use development of 500 dwellings, plus other potential uses comprising 15 hectares of employment land, a new football stadium, a new location for Braintree College, community facilities, local shops and open space. The growth location boundary is not defined, but could include:-

- Land to the west of Panfield Lane, (north of Tabor Science College) as a possible relocation site for Braintree College and housing and mixed uses
- Open space land east of Panfield Lane, including the BMX track and adjacent playing field
- Land north of Springwood Industrial Area for employment and as a possible relocation site for Braintree Town Football Club

Objections

In relation to Policy CS5 – Distribution of Employment

- Delete reference to land north west of Panfield Lane and land west of the A131 at Great Notley. It should be amended to provide for some 27-20 ha of land north and south of the A120 west of Braintree to enable greater prospect for airport related development.
- Loss of valuable amenity, loss of views, altering street scene and changes to character of the area.
- Poor access for goods and workers, major improvements would be required to road system.

In relation to Statement 1 – The Proposed Growth Locations

- Should not be taking away open space for children to exercise on when they don't get enough in this day and age
- Sporting 77 clubhouse should be rebuilt somewhere else for free if they have to move
- Brownfield land should be identified and built on first
- Money at Panfield Lane would be better spent on housing rather than all these additional facilities
- Objects to the loss of the sports field
- Development here would be against the Council's own green space policy
- Improvements to road capacity around Panfield Lane needed before more houses are built.

- Open space at Panfield Lane would need to be provided elsewhere, not at the disadvantage of its users (Essex County Council)
- Relocation of the football club will enable it to progress in the future and provide facilities which will assist in shaping the future of sport and recreation in the District. Believe Flitchway Settlement is the best place for this.
- Flitchway Settlement should be included in Statement 1 instead of north-west Braintree
- Flats and houses on nearby estates have very small or no gardens and they need this space
- Youth will lose a positive space for their social needs if Sporting 77/BMX track land is built on which may undermine work done in the Bocking area to reduce anti-social behaviour - Essex Police
- Worried about the village of Panfield becoming part of Braintree
- The character of the Churchill Road estate would be changed because it would no longer be an edge of countryside estate
- More development than is suggested could be included at Panfield Lane
- Connection to Panfield Lane site from other parts of Braintree is poor
- Do not agree that Panfield Lane is best related to the existing town areas
- Oppose football club on Panfield Lane because of increasing pollution, congestion and car parking
- Braintree College serves the whole District and should not be at Panfield Lane but in a readily accessible location, close to the focus of a public transport system
- Master planning and additional clarification will be needed, particularly for the other uses at Panfield Lane
- ALT10 Site 12 's potential impact on the setting of Panfield Hall Grade 1 and any remnants of parkland should be studied – English Heritage
- ALT10 Support the Flitchway settlement because it will bring new facilities to Braintree Lawn Tennis Club

In relation to Policy CS8 – Housing Provision and Delivery

- Comments covered above.

Made in other sections of the document

Total Comments on Housing Strategy Locations 198

Strongly agree 23

Agree 45

Disagree 69

Strongly disagree 61

Total Comments on Employment Locations 179

Strongly agree 17

Agree 43

Disagree 64

Strongly disagree 55

In relation to existing Open Space East of Panfield Lane

- Objections to loss of amenity open space East of Panfield Lane, used by BMX Club, Sporting 77 Football Club and for children's play, cricket, dog walking, picnics.
- Needed for children's play, exercise and social reasons.
- Police considered it gave opportunity for young people to engage in positive activity.
- Removal of open space could lead to increased anti-social behaviour.
- Ball games prohibited in estate.
- Gardens are too small.
- Flats do not have gardens.
- Low cost play facility.
- Loss of open space is contrary to Council's policy on retaining green spaces. BMX track and Sporting 77 could be relocated, however the loss of the greenspace would be a significant issue for this part of Bocking, which has no other facilities of this type.
- Closest comparable BMX track is in Peterborough.
- Children would not be able to travel to other BMX facilities.
- Amenity space should only be removed in exceptional circumstances, once lost it cannot be replaced.
- Council should be enhancing open space.
- The land was originally designated as green space and the Council encouraged local residents to participate and clear the site. It would be a 'kick in the teeth' to sell it for housing now.
- Local character of the area would be completely urbanised if the field was built on.
- Children would have to cross a main road, to access any new area of greenspace.
- Open space provides a buffer between the estate and Towerlands and associated traffic.
- Area is flood plain and has springs on it and the Council had to install a drain some years ago.
- Objection to loss of scout hut.
- Greenfields Community Housing have sent the Council significant concerns raised by their tenants, who live on the Glebe Estate, off Deanery Hill in Bocking. These tenants use the land east of Panfield Lane as the only area of open space on their estate and have made it clear that they do not want to lose this space, or the BMX track or football fields. An option study has recently been conducted within the Glebe Estate by Greenfields, assisted by the Rural Community Council of Essex; 80% of the residents who responded identified the open space as being important to the local community. (42 questionnaires listed the open space as being unique and special to the area.)

In relation to proposed new location for Braintree Town Football Club

- Oppose provision of football ground on Panfield Lane as it will concentrate pollution and increase traffic on match days, money is better spent on housing.
- Do not agree Panfield Lane is best location for football stadium, site south of Rayne Road would be more suitable for a football club.
- Relocation would increase car journeys.
- Braintree Town Football Club is pleased that it is included in the Strategy, but prefers the Pods Brook site for a new football ground.

In relation to proposed new location for Braintree College

- Objector states that Panfield Lane is a totally inappropriate site for Braintree College, as it needs to be easily accessed by the whole of the District.

General Comments on Growth Location

Traffic

- It would increase traffic and parking problems in the area, the area cannot cope as it is.
- Increased noise.
- No building should take place until A120 is sorted out as traffic in Braintree is already chaotic.
- Not sustainable in terms of access to road network or services.
- Development of land west of Panfield Lane would require an independent road.
- Pods Brook proposal would have better access than this growth location.

Infrastructure

- Insufficient infrastructure is available in the local area to support an increased population (schools, doctors etc).
- Already poor quality footpaths in area, how will they cope?
- Considerable development has already taken place in Bocking and no more is needed, services need time to catch up.

Other Issues

- Loss of arable land.
- Impact on wildlife.
- Increase pollution.
- Loss of privacy.
- Previously developed land should be developed first.
- No point building more houses when people are not buying them.
- Total number of houses required will not be known until a Strategic Housing Land Assessment is completed.
- Support Springwood Drive but not Panfield Lane for development.
- Future employment growth could be located elsewhere in the District.
- There should be a greater emphasis on residential development on land west of Panfield Lane.
- Do not blur boundaries between town and villages.

Support

Policy CS5 – Distribution of Employment

- No specific comments relating to employment.

Statement 1 – The Proposed Growth Locations

- Support the Panfield Lane development as long as a northern link road joining up the A133 and the top of Broad Road is created.

Policy CS8 – Housing Provision and Delivery

- As above

Made in other sections of the document

- Agree that growth area should be near Springwood Drive and Panfield Lane.
- Site is located close to Braintree and therefore reduces need to travel.
- Support in principle the mixed uses of land west of Panfield Lane, although it will require master planning.
- Support growth location for residential and football ground development.
- Support growth location if issue of access is resolved.
- A route linking Rayne Road with north of Braintree would alleviate traffic congestion in the town.
- Support for elements of growth but not football club.
- Support as a relocation site for football club.
- Braintree College's preferred relocation site is land north of Braintree Science College within this growth location.
- Essex Schools Service has stated that existing schools could be expanded to cater for this level of growth.

Officer Comments:

There is considerable local opposition to the Panfield Lane/Springwood growth location. Most of these objections relate to the potential development of the open space east of Panfield Lane. There are also many objections concerning an increase in traffic in the area. Support for this location comes mainly from objectors to other growth locations in Witham/Rivenhall. Some objectors prefer the Flich Way Settlement, which is the growth location off Pods Brook Road suggested by a developer, which includes the relocation of Braintree Town Football Club. This alternative location will be considered at the next LDF Panel meeting.

Land east of Panfield Lane

There are 3 main issues relating to the proposed inclusion of this land within the growth area:-

1 Loss of open space serving the Glebe Estate and this part of Braintree and Bocking

PPG17 sets out national planning policy on Planning for Open Space, Sport

and Recreation. This guidance encourages local authorities to undertake assessments and audits of open space, to identify specific needs and to quantify deficits and surpluses in their areas. This then forms the starting point for an effective strategy for provision at the local level.

The Green Space Strategy undertaken by this Council identifies a deficit of 53.8 hectares of open space in the Braintree and Bocking urban area, as set out in Table 1.

This is made up of a 25.2ha under-provision of playing fields, a 22.8 ha deficit of amenity greenspace and a 5.8 ha under provision of children’s play space. The loss of the playing fields east of Panfield Lane would worsen the existing under-provision within this area. Although the Sporting 77 Club and BMX track could be relocated to the growth area west of Panfield Lane, there would still be a need for local sports and play facility and open space to serve the estate, which could not be met elsewhere.

Table 1 Green Space provision in Braintree Urban Sub Area (46,820 population)

Type of Space	Total Area (Ha.)	Ha. per 1,000 population	Adopted Standard	Surplus or Deficit (Ha. per 1,000 population)	Surplus or Deficit (Ha.)
Playing fields	68.5	1.46	2.0	-0.54	-25.2
Parks & Gardens	77.2	1.65	1.2	+0.45	+21.1
Amenity Greenspace	14.6	0.31	0.8	-0.49	-22.8
Children’s Play Provision	3.5	0.08	0.2	-0.12	-5.8
Natural & Semi-natural Greenspace	38.1	0.81	No standard	N/a	N/a
Green Corridors	25.7	0.55	No standard	N/a	N/a
Total	227.6				-32.7

Paragraph 10 of PPG17 sets out national policy on maintaining an adequate supply of open space and sports and recreation facilities. This states ‘ *Existing open space, sports and recreation buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements.*’

The Council’s assessment in Table 1 does not show the land east of Panfield Lane to be surplus to requirements, but instead shows an existing deficit in open space provision. Its development would therefore be contrary to national planning policy guidance.

Paragraph 13 of PPG17 refers to development, which may provide the opportunity to exchange the use of one site for another, to substitute for any loss of open space, or sports or recreational facility. This states ‘ *The new land and facility should be at least as accessible to current and potential new users , and at least equivalent in terms of size, usefulness, attractiveness and quality.*’

Provision of new open space as part of the growth location west of Panfield Lane would not meet this requirement, as it would not be as accessible to current users of the Glebe estate.

2. The use by the Sporting 77 football club.

The Government announced an expansion of Sport England's role, as a statutory planning consultee, in March 2009, to include junior football pitches. This announcement stated that landowners, including Council's who are already required to consult Sport England on any proposed development that would affect or lead to the loss of a sports playing field, would now also have to consult in relation to mini pitches, used for junior football. Sport England objects to all applications unless the developer can prove it will protect or improve sports provision. This requirement to consult Sport England would apply to the pitches east of Panfield Lane.

3. The use by the BMX Club.

The Braintree BMX Racing Club have constructed a track here to a regional standard. They have now received £50,000 from the Essex County Council 2012 Legacy Fund to upgrade the track to a national standard. This would mean that the track would be suitable for the BMX British Championships and the club intend to bid to hold national championships here in the future. Further funding is being sought by the club, from the Greenfield Community Housing CHIP fund, to complete the track and surface the adjoining car park. The inclusion of this land within the proposed growth location, with the relocation of the BMX track to a new site elsewhere within the growth location west of Panfield Lane, would mean that resources would be required to develop the new location to a national standard and that the resources now being spent on the existing track would be abortive. The Police have also expressed concerns about the potential for anti-social behaviour if facilities for young people are reduced.

Land west of Panfield Lane

Some of the objections to the proposal to relocate the Braintree Town Football Club concerned access off Panfield Lane. The Draft Strategy proposes that it would be accessed off Springwood Drive, rather than Panfield Lane. Objections relating to Infrastructure – It would be necessary to provide additional school places and community facilities as part of the growth area development.

Objections relating to Access /relocation of the Football Club and College- The proposed complex mix of uses at the growth location contain several uncertainties at present. The relocation plans of the College and Braintree Town Football Club are at an early stage. Objectors have highlighted the need to assess transport and access requirements for this growth area in detail. Further more detailed transport assessments will be undertaken when the

Council has approved proposed growth locations. It will be necessary to phase development and to ensure that the necessary water treatment infrastructure is in place prior to the commencement of development here. The report to Braintree Local Committee recommended that it would therefore be appropriate to prepare an Area Action Plan for this growth location, which would set out a detailed master plan for new development including transport and community infrastructure that is required. This would be prepared following the approval of the Core Strategy. It would provide more detailed site specific proposals, phasing of development and design requirements through which transport, sewerage and other infrastructure can be assessed more thoroughly and set out in a formally adopted Planning Document. This would ensure that this growth location is properly planned and is of a high quality and does not adversely impact upon the local area or other parts of Braintree.

However, it is becoming apparent, from experience in other Districts, that the preparation of Area Action Plans is giving rise to problems. In particular, residents have objected to Area Action Plans and have been dissatisfied when they have been told that the principle of development has already been established by the approval of the Core Strategy.

It is therefore suggested that the LDF Panel should require a Master Plan to be prepared for the Growth Location, instead of an Area Action Plan, to be approved by the Council as a Supplementary Planning Document. The Master Plan would need to be approved by the Council, but would not need to go to a formal public examination by a planning inspector.

Braintree Local Committee was consulted on the proposed growth locations and the recommendations to the Panel are those which were agreed by the Local Committee on 10th March.

Braintree Local Committee Recommendations

To exclude land east of Panfield Lane from the proposed growth location, in order to retain open space and sporting facilities to serve this part of Bocking.

To prepare an Area Action Plan for the Panfield Lane growth location to provide more detailed site specific proposals, phasing of development and design requirements through which transport, sewerage and other infrastructure can be assessed more thoroughly and set out in a formally adopted Planning Document. This would ensure that this growth location is properly planned and is of a high quality and does not adversely impact upon the local area or other parts of Braintree.

The Area Action Plan recommendation has been replaced by a recommendation for a Master Plan, for the reasons set out in this report.

Recommendations to Council

To include a proposed growth location at land to the north-west of Braintree- west of Panfield Lane in the Core Strategy.

To exclude land east of Panfield Lane from the proposed growth location, in order to retain open space and sporting facilities to serve this part of Bocking.

To require a Master Plan to be prepared for the proposed growth location to be approved as a Supplementary Planning Document.

Land to West of the A131, Great Notley

The Draft Core Strategy proposes a 12.5 hectare Business Park (restricted to B1 and B2 uses) situated on land adjacent to the west of the A131 at Great Notley. It is recognised that there is a need to develop a specialist business/innovation park between now and 2025, as projected by the two economic studies to support a 'knowledge based economy'.

Objections

In relation to Policy CS5 – Distribution of Employment

- Developing a greenfield business park related to growth of Stansted Airport is not sustainable. The Council is opposed to the growth of Stansted Airport.
- The 12.5ha proposed allocation on land to the west of the A131 at Great Notley should be increased due to inaccuracies in the Mouchel's transport assessment from which this figure was derived.
- Site should not be restricted to B1-B2. Residential, B8 uses should be considered for the proposed site, hotel and public house to support Stansted and leisure and tourism industry
- Highways Agency queries the sustainability of the site. The Council should consider if B1 office use can be located closer to Braintree town, offering the opportunity to minimise transport movements.
- The development will have an impact on Great Notley Country Park.
- Object as it does not extend over land off London Rd/Bakers Lane, Great Notley.

In relation to Statement 1 – Proposed growth locations

- Lacks infrastructure for access for workers and could be visually intrusive.
- Essex County Council – Concern about the negative impact on the Great Notley Country Park, however, suggest some potential mitigation measures if development goes ahead.

- Objection to employment location on grounds of unsustainable access for workers.
- Already too much development around Great Notley.
- Ramblers – Growth location is pushing the built up area westwards outside the boundary set by the new A131.

In relation to Policy CS8 – Housing Provision and Delivery

- Broomhills and Springwood Drive are a disgrace and should be modernised rather than industrialise the area southwest of the A131

In relation to other sections of the document

Points raised by Braintree Chamber of Trade and Commerce, English Heritage, and 2 developers, English Heritage.

- Impact on Country Park (some potential measures suggested to mitigate impacts if development goes ahead)
- Concern over the location and extent of the proposal
- Concern regarding the sustainability of the site- poor rail linkages/cycle and pedestrian routes
- Need a better balance between homes and jobs and to encourage accessibility of development to public and non-car transport
- Promotion of alternative sites
- Lacks appropriate infrastructure
- Concern about precedent set by this growth area and impact of locating offices outside town centre that will adversely affect vitality of town centre
- Economic strategy appears to be land rather than jobs led
- Strategy is over reliant on existing allocated employment land.

Support

In relation to Policy CS5 – Distribution of Employment

- The land to west of A131 at Great Notley offers excellent accessibility to primary road network, A131 and A120.

In relation to Statement 1 – Proposed growth locations

- Essex County Council – New business/innovation Park at Great Notley could assist with tackling the local job deficiencies.

In relation to other sections of the document

- Land to the west of the A131 at Great Notley is the only site that is likely to be capable of delivering employment in the short term. Without an early release of land, the opportunity to create a strategic employment location of regional significance could then be lost.
- Uses on the site should not be limited and should include housing, B8, warehousing use, hotel and public house to support Stansted and leisure and tourism industry

Officer Comments:

Landscape Impact

The Landscape Character Assessment identifies that the proposed growth location at Great Notley is situated within the Felsted Farmland Plateau where the views are open / panoramic across the farmland and the variation in the nature of the view is dictated by the trees. The area is evaluated as having high landscape character sensitivity overall resulting from substantial semi natural vegetation lining the A131 and within Great Notley Country Park. However, it is recognised that the sensitivity of the area has been reduced by traffic movement and by large scale commercial and office development east of area between A131/A120 road corridors. It is stated in the Landscape Fringe Assessment that the area forms an important contribution to wider landscape recreational facilities and semi natural habitats associated with Great Notley Country Park.

In summary it is stated in the Landscape Fringe Assessment that new residential and employment could be accommodated within open/large scale fields, providing that a new and substantial structure of tree and shrub planting is developed in these parts of the setting area and setting of listed buildings at Slampseys Farm.

Infrastructure/Traffic Problems

The proposed growth location at Great Notley is situated within easy access to Stansted and the M11 corridor.

The Highways and Transportation Study completed by Mouchel concludes that preliminary investigation indicates that the proposed growth location at Great Notley for employment would result in considerable increases in vehicle trips in AM/PM periods, therefore the size of potential development has been significantly reduced to 12.5 ha. It further concludes that given the A131 has recently been upgraded, assessments shown at the junctions illustrate that a reasonable amount of spare capacity would allow some development to south west of Great Notley to be accommodated without amendments to existing junction arrangements.

There appear to be different conclusions between the Transportation Study prepared by Mouchel and the transport study prepared for Countryside Properties. We will be looking to Essex County Council for advice on the matter of the amount of employment land that can be served in this location by the highway network.

Alternative Uses

The Employment Land Review states that consideration should be given to designation of a new business park site (generally B1 or B2 use) in the A120 corridor in the vicinity of Braintree to provide for new demand generated by

airport related and other expansion at Stansted. It recognises that the business park type development would be suitable at this growth location providing an opportunity to develop a specialist business/innovation park between now and 2025. However, objectors point out that this location is not as sustainable for offices as a location within the town or town centre which would be more accessible for walking, cycling and public transport. Braintree District Council plans to deliver up to 14,000 new jobs in the District between now and 2025 aiming to reduce out commuting. B8 warehouse type uses do not generally provide for high job densities or the higher end jobs that the Council is seeking to promote and secure. Officers agree with the objection that suggests that employment provision should be related to job provision, rather than based upon land supply. Objectors have suggested that tourism and hotel uses could be appropriate on this site and this is accepted as being consistent with the Council's aims to increase tourism.

Bringing Forward the Site Earlier

The Water Cycle Study has highlighted problems in providing infrastructure for sewage disposal for sites to the west of Braintree, which may require a lead in period in order to provide sewerage infrastructure. This would also affect other growth locations to the west of Braintree.

Braintree Local Committee was consulted on the proposed growth locations and the recommendations to the Panel are those which were agreed by the Local Committee on 10th March, together with an additional officer recommendation to retain the proposed employment growth location at land west of the A131 at Great Notley within the Local Development Framework Core Strategy.:-

Braintree Local Committee Recommendations

To provide a significant landscape buffer between the Country Park and the employment area.

To seek advice from the Essex County Highways on the size of the site that could be developed based upon the junction capacity.

To amend the Core Strategy to include tourism and hotel use on the site.

Recommendations to Council

To retain the proposed employment growth location at land to the west of the A131 at Great Notley

To provide a significant landscape buffer between the Country Park and the employment area

To seek advice from the Essex County Highways on the size of the site that could be developed based upon the junction capacity

To amend the Core Strategy to include tourism and hotel use on the site

Land off to the South – West of Witham off Hatfield Road (Lodge Farm)

The Draft Core Strategy proposes mixed use development of 600 dwellings, plus community facilities and local shops to the south west of Witham off Hatfield Road (Lodge Farm). The growth location boundary is not defined.

Objections

In relation to Statement 1 – Proposed growth locations.

- A12 will not cope with further development in Witham, it is already very congested.
- Lodge Farm is currently used for growing crops.
- A12 cannot take any more traffic.
- Footpath into Witham from Lodge Farm is dangerous and narrow.

In relation to Policy CS8 – Housing Provision and Delivery

- Same comments as above

Made in other sections of the document

- Q11 on the Have Your Say Form was ‘Growth locations for housing and employment should be north of Hatfield Road, Witham’. The results were;

Strongly Agree – 21

Agree – 51

Disagree – 15

Strongly Disagree – 17

Total responses – 104

Points raised by Witham and Countryside Society, 2 developers and 2 residents.

- Environmentally and visually important space which provides separation with Hatfield Peverel.
- Traffic problems with the A12.
- Walking and cycling along the B1389 is dangerous.
- Braintree should be the focus of development as it is accessible.
- Development would cause a loss of agricultural land.

Support

Points raised by The Ramblers and 1 developer.

- The Ramblers stated, 'Given that Hatfield Road growth is residential and the Colchester Road area is industrial we have no criticisms in principle'.
- Growth locations for housing and employment should be north of Hatfield Road in Witham.

Witham Local Committee was consulted on 24th March on the proposed Core Strategy growth locations. They made the following recommendation to the LDF Panel, concerning the proposed location to the south-west of Witham.

Witham Local Committee Recommendation

That it be Recommended to the Local Development Framework Panel that the growth location at Lodge Farm, off Hatfield Road, Witham be limited to 300 dwellings, the potential for incorporating employment land investigated and the allocated growth area reduced.

Officer Comments:

The Core Strategy estimates that it will be necessary to provide 1,600 dwellings in growth locations, plus urban capacity sites, in order to meet the East of England Plan requirement for this District. The deletion of 300 dwellings from this growth location, would need to be either replaced in Witham or Braintree, or elsewhere in the District.

The location at Lodge Farm is closer to the town centre than the only alternative 'amber' location identified in Witham, off Conrad Road, shown in the assessment of growth locations in the Technical Supplement. The Lodge Farm location also benefits from being close to an allocated employment site off Hatfield Road and to the proposed school and other community facilities at the Maltings Lane development. This additional growth at Witham should also help to support the town centre.

Landscape Impact.

The Landscape Character Assessment identifies the proposed growth location at Lodge Farm, Hatfield Road as being situated within the Boreham Farmland Plateau. It is recognised that the A12 is a dominant feature of the landscape as the traffic noise carries across large swathes of the area reducing some tranquillity. The Landscape Fringe Assessment recognises that the area provides a distinctive rural approach and setting to western Witham, with its medium to large arable fields, scattered blocks of woodland and farmstead clusters.

In summary, the Landscape Fringe Assessment recommends that the visual impact that the new residential development could have on the surrounding agricultural fields should be taken into account. It is important to ensure that any new development is of a small-scale, responding to historic settlement pattern, landscape setting and locally distinctive building styles. Any development would need to ensure that it conserves and enhances the existing hedgerow pattern and strengthens through planting where appropriate to the local landscape character. Overall, this area has low to moderate sensitivity to change.

Farmland Value

Agricultural land in the Braintree District is classified as Grades 2 and 3 with 66% of agricultural land classified as Grade 2 and 33% as Grade 3. The Lodge Farm, Hatfield Road proposed growth location is situated on land classified as Grade 2. The majority of Witham is surrounded by Grade 2 although there are strips of Grade 3 soils which follow the path of the River Brain to the north west of Witham and the River Blackwater to the east of Witham. Land classified as Grades 1, 2, 3 falls into the 'best and most versatile' category in PPS 7 Sustainable Development in Rural Areas.

However, considering that most of the District has land classified as Grades 2 and 3 it is inevitable that any proposed green field development on arable land would be affected. It is considered that this issue should not affect the acceptability of identifying this growth location.

Coalescence with Hatfield Peverel

Although the proposed growth location at Lodge Farm on the edge of Witham would reduce the gap between the settlements of Witham and Hatfield Peverel, the open countryside between the proposed growth location and Hatfield Peverel would remain undeveloped, therefore retaining the separation between the two settlements. The village of Hatfield Peverel is situated some 1.5 kilometres to the south west of the site, beyond the A12.

Infrastructure/Traffic Problems

The proposed growth location at Lodge Farm, Hatfield Road, Witham is situated close to the A12. The Highways and Transportation Study completed by Mouchel indicates that they expect access to the proposed site (Lodge Farm) to be provided via a new arm on the roundabout of the B1389 Hatfield Road/Gershwin Boulevard Roundabout.

The study summarised that the B1389 Hatfield Road/Maltings Lane and B1389 Hatfield Road/Howbridge Road/Spinks Lane Junctions are both shown to suffer significant congestion in AM/PM peak hours in 2025. The addition of traffic from the proposed Lodge Farm development would further contribute to these delays. It also stated that although not as notable, delays are also predicted for the signalised junctions of B1389 Newland Street/Collingwood Road/Maldon Road and B1389 Newland Street/The Avenue/The Grove in 2025 for AM/PM peak hours. Once again, the proposed Lodge Farm development would only add to these delays. Given the reasonably low flows onto the A12 northbound main carriageway at this proposed development location, it is considered that its current layout could satisfactorily accommodate the 2025 base and proposed Lodge Farm development in the AM/PM peak periods. However, the A12 southbound merge is expected to have higher than acceptable flows in the AM peak in 2025. The proposed development would only serve to exacerbate this. It is understood that a scheme to upgrade the junction might be completed in future by the Highways Agency, which could potentially increase the scope for additional development in the locality.

The Highways and Transportation Study concludes that the addition of a development at Lodge Farm will further contribute to delays in the vicinity. However, it identifies potential delays at all the proposed growth locations which could be eased with junction improvements. Any development at this proposed growth location must contribute towards the improvement of the cycle/pedestrian and public transport network.

Additional Employment Site

The Draft Core Strategy identified the growth area at Lodge Farm as a mixed use growth location, but does not specify employment use here (*as proposed by developer*). This had not been suggested as an employment site because of concerns about the capacity of the A12 junction and specifically the fact that HGV's wishing to access the site from the Colchester direction, would need to travel through Witham. It would therefore need to be tested for transport and environmental impacts before a conclusion could be reached

Recommendations to Council

To retain the proposed growth location of 600 dwellings at land to the south-west of Witham –off Hatfield Road.

The suitability of the proposed growth location at land to the south-west of Witham for employment development should be examined, in terms of highway access.

Land to the North - East of Witham – off Forest Road in the parish of Rivenhall

The Draft Core Strategy proposes that 300 dwellings with associated community facilities and open space be provided as an urban extension to the north east of Witham, off Forest Road. This would be in planning terms an urban extension of Witham, although in administrative terms the land lies with in the Parish of Rivenhall.

Objections

In relation to Statement 1 – The Proposed growth locations

- Landscape to the north-east of Witham at Forest Road is particularly attractive
- All Greenfield growth should be located at Braintree.
- Impact of Forest Road on the Grade II listed Old Rectory Parkland setting should be assessed.
- This approach is too broad brush, some of the sites around Witham could have smaller acceptable parts to them
- Concerned about the road network, especially Forest Road, will not cope with additional traffic.
- Proposals at Forest Road and Eastways ruin Rivenhall's rural nature.
- Development at Forest Road would destroy the community of Rivenhall
- This proposal does not fit with your designation of Rivenhall as an 'Other Village'.
- Services in Witham would not cope with the increasing number of people
- Rivenhall Parish Council- Concern that the Rivenhall Village Design Statement was not seen before proposals for growth locations were decided
- Countryside policies are meant to protect this land from development – Rivenhall Parish Council
- Development will cause coalescence between Rivenhall and Witham – Rivenhall Parish Council
- The parish in which land to the north-east of Witham is located has no bearing on the selection of the site as a preferred growth location

- Witham Town Council- Oppose the designation of land off Forest Road because of concern about the erosion of 'green wedge' between Witham and Rivenhall.

Made in other sections of the document

- Question 12 of the Have Your Say Form asked; '*Growth locations for housing should be off Forest Road in Witham*'. The results were;

Strongly Agreed 9

Agree 24

Disagree 17

Strongly Disagree 53

Points raised by Witham and Countryside Society, Rivenhall Parish Council, Cllr Gyford, Cllr Abbott, Bellway Homes and the Raven Group, Berkeley Strategic and 13 local residents

- All the greenfield growth for the District should be accommodated at Braintree
- Building an estate off Forest Road would connect Rivenhall to Witham
- Development within the Parish of Rivenhall goes against the Village Design Statement.
- Do not blur the boundaries between towns and rural areas
- Concern that the road network will not cope with an increased level of traffic
- This is environmentally and visually important land
- This does not fit with your proposed hierarchy as Rivenhall is an 'Other Village'
- A parish appraisal questionnaire clearly demonstrated that parishioners wanted to preserve the current land boundaries of the parish
- There must be a focus on developing brownfield land first.
- The development would rely too much on car travel
- There is a lack of services in the area to support this new development.
- Indicative masterplan for the growth location submitted by developer, proposes a 'preferred option' site area of 22 hectares, that is bounded by Forest Road, Rickstones Road, part of Rectory Lane and the Rivenhall Oaks Golf Club. This area could accommodate over 800 dwellings (at a density of 40 dws per hectare), which is more than twice the level of growth that the Draft Core Strategy is proposing for this location.

Support

Points raised by Bellway Homes and the Raven Group

- Support the identified growth location but request the detail of parish is removed from the description as no other growth location is identified by parish. (Also see points in opposition)

Witham Local Committee was consulted on 24th March on the proposed Core Strategy growth locations and the regeneration proposals at Silver End. They made the following recommendation, concerning the proposed location at land north-east of Witham, off Forest Road. (Their recommendation concerning Silver End regeneration will be reported to the next LDF Panel meeting.)

Witham Local Committee Recommendations

That it be Recommended to the Local Development Framework Panel that the growth location north of Forest Road in the Parish of Rivenhall be deleted from the Core Strategy and alternative sites investigated.

Officer Comments:

Coalescence

The Draft Core Strategy cannot be site specific, but the scale of the growth proposed, 300 dwellings, could be provided in the land to the south of the Rickstones Road/ Rectory Lane junction and would not need to include land to the west of Rectory Lane, or the fields to the rear of houses on Rickstones Road. The eastern boundary of the growth location would be the existing edge of the golf course.

Whilst there are some constraints on this location, for example a no build zone around a gas pipeline, this area could accommodate 300 dwellings at a reasonable density level (around 40 dwellings per hectare). This will reduce the gap between Witham and Rivenhall but there would still remain a significant undeveloped area and when travelling along Rickstones Road, there would be no change from what is there today.

The proposed masterplan submitted to the Council by developers covers a larger area than that required to provide the 300 dwellings that are proposed in the Draft Strategy.

Transport

A transport study by Mouchel on the effects of the Core Strategy growth location found that:

- There would be 50 extra trips in each peak period on Oak Road, Rivenhall because of the development
- N-bound diverge at A12/Oak Road may need to be upgraded to accommodate extra traffic
- Double mini roundabout of Cressing Road/Rickstones Road/Cypress Road

and Braintree Road shows significant delays in peak hours in 2025 without development, and this development would add to these delays.

They conclude that many junctions in Witham will suffer from delays due to background increases in traffic levels in 2025, which any development may add to and so some amendments to junction layouts may be required. Any application for this site would also need to encourage travel to the site by walking, cycling and public transport.

Development would be better located elsewhere

The Urban Capacity Study has shown that although there are some opportunities for development within the existing boundaries of towns and key service villages, further development is needed in order to meet the housing targets laid out in the RSS East of England Plan. Braintree and Witham were considered the most sustainable locations for this additional growth.

An assessment of peripheral growth locations around the two towns was carried out and is detailed in pages 50 – 61 of the One District One Vision Technical Supplement. This gave each site either a red, amber or green score depending on its suitability for development. For housing, land off Forest Road and Lodge Farm were 'green' the most sustainable locations for growth around Witham, (16) to the north of Conrad Road was amber 'less suitable for development' because of its location further away from the town centre, railway station and employment opportunities and all other sites as red 'unsuitable for development'. If either the Forest Road, or Lodge Farm proposed locations were rejected or reduced by the Council, then we consider land North of Conrad Road to be the only real alternative in Witham

Lack of Services

As one of the main towns in the District, Witham has a wide range of shops and services, as well as good links by road, rail and public transport to other parts of the District and beyond. No concerns have been identified by Essex County Council relating to the provision of health and education services for this site. Any development would include a legal agreement with the Council to provide contributions for further community facilities, where needed, in the area.

Landscape Character

The Braintree District Settlement Fringe Landscape Capacity Assessment completed in November 2007 shows that the landscape around Witham all has a low – medium landscape capacity to absorb new development. However the report does highlight a number of areas around Witham where additional development may be possible, including a site it describes as between Yew Close and the Golf Course. Any proposal would need to have an approved landscape and boundary scheme and appropriate protection would be sought for the protected grassland and listed building of The Old Rectory.

The Rivenhall Village Design Statement

This document was published in July 2005 and was based on work carried out from 2002 which also resulted in the production of a parish plan. The Village Design Statement (VDS) has been approved by the Council as material planning guidance. This means that the opinions expressed in the VDS will be taken into account when making planning decisions but it is not a statutory planning document.

On the issues of growth the VDS is clear and the guidelines on page 17 state; *'The countryside between Rivenhall main village envelope and Witham town development boundary should be protected from development to retain the rural character of this area'*. However it also recognises that; *'... all such envelopes are subject to periodic review and cannot be assumed to be permanently set at the current limits'* (page 5). In addition the plan makes a number of detailed design, parking and transport points and stresses the desire for additional housing in the parish to cater for young families, renters and elderly residents looking to downsize. These requirements along with new community facilities such as local shops and open space could be provided in any new development. However it is clear this scale of new housing is not what the VDS intended, rather; *'Any future developments should be small scale developments to ensure the rural character is preserved including the un-crowded characters'* (page 4).

The VDS also makes specific reference to provision of new industrial development within the parish. The guidelines on page 26 state; *'Industrial units should have safe access points which do not pose any potential problems to other road traffic. Industrial units should be well screened to reduce visual and audible impact. Industrial and commercial units should have lighting restricted to the area of the units to reduce the levels of light pollution. Proposals for new industrial or commercial sites likely to lead to an increase in heavy goods vehicles through the parish should be discouraged in order to protect the narrow roads and verges in the Parish'*. It is considered that the extension proposed at Eastways could accommodate all these requirements and would make use of existing accesses from Witham.

Recommendation to Council

To retain the proposed growth location of 300 dwellings at land to the north-east of Witham –off Forest Road.

Land to North East of Witham, (adjacent to Eastways/Waterside Park) in parish of Rivenhall

The Draft Core Strategy proposes a growth location which would be an urban extension of about 6.0 hectares of general employment land to the existing Eastways Industrial Estate. In planning terms this is an urban extension to Witham, although the land is in administrative terms, within the Parish of Rivenhall.

Objections

In relation to Policy CS5 – Distribution of Employment

- The vacant/allocated employment land table emphasises that Witham has by far the most available land and therefore there is no need to allocate the 6 hectares at Rivenhall End.
- Object to extension of Eastways towards Rivenhall End.
- Rivenhall Parish Council - The District Council can meet its industrial land allocation quota without the Eastways extension and we would suggest a key focus should be to use the land already allocated within Witham.
- Industrial ribbon development towards Rivenhall End.
- Witham Town Council did not make any specific comments about this growth location.

In relation to Statement 1 – The Proposed Growth Locations

- Eastways extension is in close proximity to suggested site A1 identified for minerals extraction within the Minerals Development Document Further Issues and Options paper (Essex County Council)
- Extensive bunds and planting put in after the last Eastways expansion were meant to mark the end of the industrial estate – Rivenhall Parish Council
- Proposals at Forest Road and Eastways ruin Rivenhall's rural nature.
- The countryside along the A12 is farmed and includes potentially ancient hedgerows which should be protected – Rivenhall Parish Council
- Witham already has large areas of vacant or allocated industrial land and does not need any more.
- Development here would be contrary to the Rivenhall Village Design Statement – Rivenhall Parish Council
- This is environmentally and visually important land which provides separation between Witham and Rivenhall End.
- Support ALT12 option for supplying a lower amount of employment land by deleting this requirement

Made in other sections of the document

- Question 12A on the Have Your Say Form asked; 'Growth location for employment should be an extension of Eastways, alongside the A12, between Witham and Rivenhall End'

Strongly Agree 1
Agree 4
Disagree 8
Strongly Disagree 22

NB This question was mistakenly omitted from the original form and only added later, hence the lower number of returns

Points raised by Rivenhall Parish Council, Witham and Countryside Society, Cllr Abbott, Cllr Gyford and 2 residents

- Witham already has large amounts of vacant or allocated employment land and does not need any more.
- Support ALT12 option for supplying a lower amount of employment land by deleting this requirement
- Environmentally and visually important land which provides separation between Witham and Rivenhall End.
- Development here would be contrary to the Rivenhall Village Design Statement
- The planting belt at the end of Eastways was put in place to signify no further development should be allowed in that direction

Support

In relation to Policy CS5 – Distribution of Employment

- The proposed extension of Eastways Industrial Estate is considered to follow the three guiding principles for the vision of Braintree District.
- The site to north east of Witham is considered to be an appropriate location for employment growth adjacent to the existing Eastways Industrial Park.
- The site is adjacent to an existing industrial area and constrained by the A12 trunk road to the south and the railway line to the north.

In relation to Statement 1 – The Proposed Growth Locations

- Witham is a good location for new employment because of its accessibility and strong commercial and business community.
- Location of employment at Witham will reduce out-commuting.
- The site is accessible by a range of transport modes

Made in other sections of the document

Points raised by Chelmsford Diocese Board of Finance, Sible Hedingham Parish Council, CML Microsystems

- Increased employment should be provided in Witham because of its good transport links
- Will help to reduce out commuting by providing jobs for the residents of Witham.
- Site is accessible by a wide range of transport modes.
- Will encourage major commercial business to invest in the town and to further its success

Witham Local Committee was consulted on 24th March on the proposed Core Strategy growth locations. They made the following recommendation, concerning the proposed location at land north-east of Witham, off Eastways/Waterside Park:-

Witham Local Committee Recommendations

That it be Recommended to the Local Development Framework Panel that the proposed employment growth location to the north-east of Eastways Industrial Estate in the Parish of Rivenhall be deleted from the Core Strategy and the need for employment land recalculated, with any demand for land being met from an alternative site.

Officer Comments:

Employment Land Requirements

The Draft Core Strategy had made provision for both residential and employment development as extensions to Witham, with the aim of providing sustainable future development.

The Employment Land Review provides information on existing employment floorspace in Braintree District as at August 2007 in Table 5-2, which is reproduced here, together with the percentage provision in each location.

Location	Emp floorspace in sq metres	% in each location
Braintree (inc Gt Notley)	394,364	27%
Witham	516,660	36%
Halstead	105,525	7%
North of District	386,573	26%
South of District	51,568	4%
TOTAL	1,454,690	100%

This shows that there is already the greatest proportion (36%) of existing employment in the District located in Witham. It is not therefore essential to increase this provision to ensure that employment opportunities are sufficiently available in Witham.

Many of the objections state that the proposed additional employment land is not required to meet the minimum of 3 hectares of employment land per annum as recommended in the Employment Land Review.

Paragraph 5.18 of the Draft Core Strategy states that the provision of a minimum of 3 hectares of employment land throughout the plan period (as

recommended in the Employment Land Review) would require 57ha of employment land to be allocated, of which 32.5ha has already been identified. The Council is now proposing to extend the plan period by one year to 2026, which would increase the requirement to 60ha. The balance of new employment land required would be 27.5 ha. As the Core Strategy is proposing 15ha at the growth location north-west of Braintree and a minimum of 12.5ha west of Great Notley, this would meet that requirement without the need for an additional employment location off Eastways.

In addition, the rate of employment land development has slowed significantly due to the recession. Table 4.2 of the Employment Land Review identified annual employment floorspace development in the District in 2005/6 and 2006/7 as being equivalent to 7.5ha in 2005/6 and 10.75 ha in 2006/7. However this had fallen to 0.63ha in 2007/8. Although this is hoped to be only a short-term slow down, it has reduced the overall level of employment land required.

The Draft Core Strategy had included an Alternative Option 12 which provided for a lower annual level of employment development, which had included the removal of the proposed additional provision of 6 hectares north-east of Witham (off Eastways within Rivenhall Parish.)

Elsewhere in this report is a recommendation to seek advice from Essex County Highways on the size of the proposed employment growth location west of Great Notley, based upon junction capacity. This could provide additional employment land in the District, but it is not necessary to replace the proposed 6 ha employment extension to Witham, if Members resolve to delete the employment location off Eastways.

Landscape Concerns

The Braintree District Settlement Fringe Landscape Capacity Assessment completed in November 2007 shows that the landscape around Witham all has a low – medium landscape capacity to absorb new development. The current Eastways development is visually prominent from the A12. If development were to go ahead here, an extensive landscaping scheme would need to be agreed, including creating a new landscaping bund to the rear of the development closest to Rivenhall End. However it is likely that the site would still be seen when travelling on the A12 and could provide an extended ‘industrial entrance’ to Witham.

Coalescence with Rivenhall End

There is a distinct gap between the proposed development and houses in Rivenhall End. The area between the two is rural in nature and provides a clear gap between the settlements when viewed from the A12 or railway line. The proposed employment location is within the Parish of Rivenhall, but is geographically an extension of the Witham employment area

Rivenhall Village Design Statement

This document was published in July 2005 and was based on work carried out from 2002 which also resulted in the production of a parish plan. The Village Design Statement (VDS) is approved by the council as material planning guidance. This means that the opinions expressed in the VDS will be taken into account when making planning decisions but it is not a statutory planning document.

On the issues of growth the VDS is clear and the guidelines on page 17 state; *'The countryside between Rivenhall main village envelope and Witham town development boundary should be protected from development to retain the rural character of this area'*. However it also recognises that; *'... all such envelopes are subject to periodic review and cannot be assumed to be permanently set at the current limits'* (page 5). In addition the plan makes a number of detailed design, parking and transport points and stresses the desire for additional housing in the parish to cater for young families, renters and elderly residents looking to downsize. These requirements along with new community facilities such as local shops and open space could be provided in any new development. However it is clear this scale of new housing is not what the VDS intended, rather; *'Any future developments should be small scale developments to ensure the rural character is preserved including the un-crowded characters'* (page 4).

The VDS also makes specific reference to provision of new industrial development within the parish. The guidelines on page 26 state; *'Industrial units should have safe access points which do not pose any potential problems to other road traffic. Industrial units should be well screened to reduce visual and audible impact. Industrial and commercial units should have lighting restricted to the area of the units to reduce the levels of light pollution. Proposals for new industrial or commercial sites likely to lead to an increase in heavy goods vehicles through the parish should be discouraged in order to protect the narrow roads and verges in the Parish'*. It is considered that the extension proposed at Eastways could accommodate all these requirements and would make use of existing accesses from Witham.

In accordance with the recommendation by Witham Committee, taking account of the ability to meet employment land requirements without this growth location and the prominence of the site, it is proposed that the location should be deleted:

Recommendation to Council

That the proposed growth location (for 6.0 ha of general employment) at land to the north-east of Witham (adjacent to Eastways/Waterside Park) be removed from the Core Strategy.

Halstead Local Committee was consulted on the proposed Core Strategy growth locations and the regeneration proposals at Sible Hedingham. They supported the Core Strategy proposals and made the following two recommendations to the LDF Panel at their meeting on 18th March. (Their other recommendation concerning Sible Hedingham regeneration will be reported to the next LDF Panel meeting.)

Halstead Local Committee Recommendations

That the proposals in the draft strategy to not promote a growth location at Halstead should remain.

That the Core Strategy emphasises that there will be continued opportunities for growth within the Halstead boundary and these sites will be considered more fully regarding their potential uses during the production of the Site Allocations document.

Paragraphs 4.35 – 4.46

The remaining part of this chapter, 4.35 – 4.46, includes details on the amount and type of development in each of the growth locations and also contains the key diagram.

Objections

- Picture 4.1 should be called the Proposal Map and should contain information about waste and mineral safeguarded areas – Essex County Council
- Object to key diagram as it does not sufficiently provide for the growth of Halstead and the north of the District
- A full archaeological investigation should be undertaken prior to the commencement of development – Essex County Council
- May be a need for additional dwellings at Braintree but this will not be known until the Strategic Housing Land Availability Assessment (SHLAA) has been completed
- The table in 4.42 is critical and should be included in a policy on distribution of housing growth
- A maximum size for 'local shops' should be included here to ensure they do not detract from the viability and vitality of town centres.
- Dwelling numbers identified in 4.42 should be expressed as a minimum.
- ALT8 is supported as the Core Strategy must be effective at being deliverable, flexible and able to be monitored.
- Flexibility in employment land provision or in policy wording should be provided to ensure economic growth is not compromised by lack of supply of employment land
- ALT9 is supported with a slightly higher distribution in the villages.

- Support ALT10 as other sites outside Braintree and Witham should be considered for growth
- The Core Strategy should identify the majority of the District's greenfield growth to take place at Braintree.
- Land at London Road, Braintree should be included as a growth location because it provides the most sustainable and appropriate location for growth
- In ALT12 it does not follow that if the Rivenhall allocation is deleted a further 3 ha must be deleted at Braintree. The two sites are not related.
- Land assembly should not provide a significant issue for mixed use development north and south of the A120, west of Braintree as suggested by ALT13.

Support

- Agree that site 15 in Witham should not be selected because of its impact on Grade 1 Faulkbourne Hall and its parkland setting – English Heritage
- Agree that sites 1 and 13 would have significant impact on the character of Bocking Conservation Area – English Heritage
- ALT9 does not reflect national/regional planning policy and should not be supported
- Do not support ALT13 because the road network north of the A120 is already congested.

Recommendations

Full list of factors considered in relation to potential growth areas, as listed on page 50 of the technical study to be included in 4.31 of the Draft Strategy for People and Places in Braintree District to 2025

- A further paragraph explaining why the growth locations have been chosen should be included in 4.33.
- Wording amended relating to Highways Agency
- Details of proposed growth locations should be included (e.g. as set out in 4.42 and Statement 1)

Part 5 – The Four Priority Themes for the Braintree District

Please note that only Policies CS5 and CS8 have been considered in this report as they relate specifically to the proposed growth locations. Policy CS1, CS2, CS3, CS4, CS6 and CS7 will be considered at future Local Development Framework Panel meetings.

2. Distribution of Employment (Pages 69/70/71)

In addition to the comments specifically relating to the employment growth areas proposed, the following comments were made;

Paragraphs 5:13 to 5:23 are the preamble to Policy CS 5 and include details from the findings of the Employment Land Review, report by Cambridge Econometrics, and the Regional Economic Strategy for the East of England. It defines the proposed targets for delivering sufficient employment land.

Objections

- Disagree with the findings of the Employment Land Review (ELR) on the basis that the Review has not been carried out fully in accordance with the East of England Guidance Manual as claimed by the authors of that Report in Para 1.2 of the Employment Land Review.
- Disagree with ELR in that it does not reflect the realities of retaining Central Park site (Halstead) for employment. Core Strategy should encourage mixed use schemes.
- Object to paragraph 5.17 – ELR does not properly assess the contribution of the vacant employment land to new job creation prospects it is not possible to place any reliance on the quantum of additional land required for either employment or residential purposes.
- Core Strategy reliant on delivering the maximum number of jobs (14,000) from a release of only minimum amount of land recommended in the Employment Land Review (3 Ha per annum).

Support

- Support recommendations in paragraph 5.14 although the take up rates are likely to be low.
- Support the emphasis on increasing prosperity and bolstering economy, particularly in present climate. Boxted Wood would provide large area of high quality employment land towards later in plan period.
- It is critical that seven year supply focuses on sites that are suitable and deliverable.
- The plan, which incorporates a contingency, is considered to provide a realistic, flexible approach to provide deliverability.
- Support paragraph 5.23 – We support need to identify employment premises that are no longer ‘fit for purpose’.
- Support paragraph 5.19 – Strategy should plan for development of a total of 66 hectares for employment land over the period.

General

- Go East – Reference should be 3 hectares per annum in paragraph 5.18.

Recommendations

Amend paragraph 5:18 of the Draft Strategy for People and Places in the Braintree District to 2025 to read, '*Provision of a minimum of 3 hectares of employment land per annum, throughout the plan period.*'

Policy CS5 – Distribution of Employment

Comments relating to each of the specific proposed employment growth locations are discussed above in detail. The comments below are general relating to CS5.

General

- It is agreed that the approach to locate employment uses in main settlements of Braintree and Witham is most appropriate. This will provide balance between the workforce in the main settlements and access to jobs.
- East of England Regional Assembly - supports identified locations for employment but suggest more reference to employment land review to provide more robust justification.
- GO East - Would be useful for phasing to be defined as part of the policy wording in CS5.
- Object to CS5 as the distribution of future employment should allow for the growth of existing employment locations in addition to new growth locations.

Recommendations

**Further reference to be made to the Employment Land Review in the preamble, to provide robust justification for Policy CS5.
Ensure phasing is defined as part of the wording in Policy CS5.
Make reference to provision of jobs.**

Policy CS5 – Alternative Locations

Option CS5 ALT 1

The location of new employment land is an integral part of the overall Spatial Policy for the District including Growth Locations, which is intended to deliver the most sustainable forms of development. Significantly different locations would be contrary to this strategy and would lead to a mis match of jobs and housing.

Objections

- A significantly increased role for employment generation in Key Service Villages can be made which would not necessarily lead to a mis match between jobs and housing. Indeed, concepts such as Rural Business Centres or Seedbed Centres appropriately located within or alongside Key Service Villages could provide opportunities for existing and future residents.

Support

- No comment.

Option CS5 ALT 2

An alternative location for the new business park could however be north of the A120 in Braintree. This has the disadvantage of being in a more than one land ownership, which might mean delivery is problematic. It would also reduce the strategic gap between Braintree and Great Notley.

Objections

- Highways Agency – the fact that land is in more than one ownership should not necessarily be a barrier for development of a site. This option could provide the opportunity for reducing the need for travel as site is located closer to residential areas of Braintree than the preferred site southwest of Great Notley.

Support

- It is worth noting delivery is not the sole issue in relation to site north of A120. Unlike the road network around the land to the west of the A131 at Great Notley, the road network to the north of the A120 is already congested and this would be worsened by development in this area.

Option CS5SLT 1

The District Council could seek to provide for a higher annual level of employment development. Land requirements based upon an annual provision of 4 hectares would require 76 hectares of employment land over the plan period. However, discussions with Essex County Council and Highways Agency on highway impact have identified constraints to higher levels of employment development at Braintree and Witham. Additional

provision would require further highway assessments in the proposed new locations.

Objections

- The numbering appears to be incorrect as there are two ALT 1 policies on page 72.
- The statement regarding highway constraints is incorrect. Highway Assessments by Colin Buchanan & Partners indicates land to west of the A131 at Great Notley could provide up to 37.5 hectares of employment land, providing up to 150,000 sq m of accommodation, within capacity of existing highway network.

Support

- No comment.

Option CS5ALT 3

The District Council could seek to provide for a lower annual level of employment development by, for example, reducing the provision to 57 hectares (a minimum of 3 hectares per year through the plan period.) The new provision could be reduced by either reducing the Braintree provision by 9 hectares, or by removing the proposed additional provision of 6 hectares north of Witham at Rivenhall and reducing the Braintree provision by 3 hectares.

Objections

- No comment.

Support

- We support the Council in not promoting this option. Any slowing of the provision of land is going to limit the ability of District to achieve its aim of economic prosperity.

Please note that comments relating to Policy CS8 – Housing Provision and Delivery will be considered at the next LDF panel meetings.

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