

**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 objections to and comments in support of the Core Strategy, which were made during the public consultation on the One District- One Vision Strategy in November and December 2008.

The comments relate 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 covers comments relating to Parts 1 to Part 4 Alt 7of the Core Strategy. It does not include the objections to the proposed growth locations and therefore does not include the recommendations from the Local Committees relating to these.

The remaining objections will be considered in reports to the LDF Panel on 20<sup>th</sup> May and 17<sup>th</sup> June.

## **Title, Commitment to this Strategy, Part 1 Introduction and Background and Part 2 A Portrait of Braintree District**

This part of the document gives a general overview of the process for the document and an overview of the District as it currently stands. Comments about these sections tend to be more general and process points. Where specific issues have been raised, (for example housing numbers), these are often covered in more detail in later chapters of the document and officer comment and recommendations relating to these issues will be found in the later committee reports.

The Council also received a number of suggestions for minor word changes to this part of the document, which will be incorporated where possible and appropriate.

## **Title and Commitment to this Strategy**

### **Objections**

- The lack of technical studies such as a Strategic Housing Land Availability Assessment (SHLAA) and a Sustainability Assessment (SA) are a key omission of the document
- Concern that the baseline data used in the document is from 2006/07 and does not take into account the current economic climate (from Ridgewell Parish Council)
- Comments should not be restricted to agree/disagree.
- Adherence to Regional Spatial Strategy/government guidance may not be the best approach for the District.
- The final strategy should be the responsibility of BDC on behalf of the electors and not the Local Strategic Partnership
- It would have been of benefit to have a more co-ordinated and coherent approach within the LSP thematic partnerships to enable the likelihood of minimal changes being requested as part of this consultation process (from LSP)

### **Support**

- The Have Your Say Questionnaires were a good idea
- Commended BDC on uniting the LSP and the Core Strategy into a single document – Rural Community Council of Essex

### **Officer Comments**

The amount of housing land that the plan is required to provide is set out in the Regional Spatial Strategy (the East of England Plan) and is not altered by the current economic climate. The development of housing and employment land may be reduced by the economic downturn. However, if it is not all developed during the plan period, it can remain available for development after 2026.

### **Recommendations**

- **Technical studies including the SA and SHLAA will be presented to the LDF panel, and changes to the Core Strategy made where necessary and recommended by these studies.**

- **That the online consultation response form be amended to include a 'comment' option, in addition to the agree/disagree options.**

## **Part 1 - Introduction and Background**

### **Objections**

- The Council's evidence is not sufficiently detailed or robust and does not include key documents like a Sustainability Assessment, Biodiversity Action Plan and details of Conservation Area Appraisals. (CEMEX, Natural England, English Heritage)
- Combining the two strategies makes the document confusing and this may affect the quality of the responses. Neither is it clear which parts will be included in the final document (Essex County Council, Crest Nicholson, English Heritage, WG Developments)
- Sustainable should be defined more clearly and not misapplied (Go-East, Esco Business Services Ltd)
- Government policies are short term and often contradictory, we should give weight to them but balance them with other concerns
- Protecting historic environment should be a priority (English Heritage)
- The out-commuting problem in the District should be given more weight
- High density housing should not be necessary
- The title of the document needs to better indicate its status
- Green infrastructure should be included and defined (Natural England)
- There should be a specific statement on whether the village envelopes will be retained (Finchingfield PC)
- The document lacks a monitoring and review framework

### **Support**

- Support for the joint Sustainable Community Strategy and Core Strategy
- The consultation period is a decent length.

### **Officer Comments**

The Core Strategy does not propose any growth locations on the periphery of villages. Small scale additions or changes to the village envelopes can be considered during the preparation of the Allocations document following the approval of the Core Strategy.

### **Recommendations**

- **That a list of all the evidence base studies is included in the final submission document and documents are available for public viewing.**
- **A comprehensive monitoring and review framework should be included in the final submission document.**
- **Data on ethnicity and disability rates and more emphasis on the problem of out- commuting should be included in the Portrait of the District section.**

- **The submission document should be the Core Strategy and not a joint Core Strategy and Sustainable Community Strategy.**

## **Part 2 – A Portrait of Braintree District**

### **Objections**

- External linkages and influences on the District should be acknowledged and identified (Essex County Council)
- The key problems should also be identified (Essex County Council)
- Key facts from the evidence base should be included
- 2.3 should be clearer
- More information on ethnicity, disability, migration, deprivation and those who use services out of the District should be included.
- Everyone does not need the same services and the location should be accessible not just 'in towns'.
- The plan should acknowledge that housing figures in the East of England Plan are minimums.
- The District should provide a greater number of potential employment sites to provide more jobs (E Hobbs [Farms])
- The proposals should include the importance of sport, tourism and recreation's contribution to the District
- BDC should support better broadband supply for all residents

### **Recommendations**

- **Influences on the district from services centres, growth locations and major employment centres in neighbouring authorities should be included.**
- **Data on ethnicity and disability rates should be included in the Portrait of the District section.**
- **Reference should be made to the fact that the East of England Plan housing provision figures are a minimum requirement.**

## **Part 3 A Vision for the Braintree District, Aims and Objectives**

This section sets out:

- The Joint Vision for the Braintree District ( with the Sustainable Community Strategy)
- The Joint Aims and
- 12 Key Objectives.

It also sets out three Guiding Principles which will be implemented to deliver the Vision, Aims and Objectives:

- Promoting and Delivering a Sustainable Future
- The Protection and Enhancement of the Environment in the District
- Delivering the Development we need

### **Box 1 The Vision**

Overall the Joint Vision was supported by consultation responses. However a number of key issues were raised that require consideration as follows:-

### **Statutory Consultees Comments**

Natural England suggest adding “*ensuring the protection and enhancement of the natural environment*” to the Vision.

Go East- The Vision Statement relating to the Core Spatial Strategy must reflect the scale and general locations for the growth/development/land-use changes that the plan policies and proposals aim to influence and secure within the plan period.

### **Other Comments**

- Finchingfield PC -Use of word “improve” in the Vision is too vague in terms of how it will be applied to the villages.
- The Vision should place more emphasis on creating a low carbon society

### **Officer Comments**

The Joint Vision was created as a direct result of the “joining up” of the Core Strategy and Sustainable Community Strategy for the consultation and was intended to be a short statement of intent that took in the essence of both strategies.

One of the main difficulties is that the two strategies cover the same issues from differing aspects and therefore could be said to require a different approach to “visioning” This is the point made by GO East.

To some extent this is a “technical issue” but it is best to try to resolve it now to minimise the likelihood of it causing problems at the examination.

Current advice and practise on this matter varies.

Advice from the Planning Advisory Service seems to suggest that the Core Strategy should be a more “place based “statement of the Sustainable Community Strategy Vision, which might result in the need for two separate but closely aligned “Visions”.

Other Core Strategy Visions set out in approved documents seem to vary considerably in content and style. However none have yet been found that attempt the “joint vision“approach being suggested in the Councils One District –One Vision document.

3 basic approaches seem to be emerging nationally, and all three have been supported by inspectors at examination.

- A relatively simple but quite “generic” statement, similar to Braintree’s current approach.
- A more detailed but still quite general statement , but which also sets out some of the key spatial elements and issues to be tackled
- A much more detailed and “place specific” approach setting out in some detail the vision for each place or location plus issues affecting the whole Local Planning Authority area.

An example of the first approach is Chelmsford:

***The Borough of Chelmsford will be at the leading edge for economic, social and environmental excellence at the heart of Essex, where people choose to live, work and visit because of the ever-improving quality of life available to all, now and for future generations.***

An example of the second approach is Hambleton (North Yorkshire):

***By 2021 Hambleton's communities will have become sustainable, prosperous, safe, healthy and vibrant. The development of vibrant and prosperous market towns and sustainable rural communities will have been supported.***

***People from all sections of society will have been provided with access to homes, jobs and services, more of the District's younger population will have been retained and the needs of the elderly will have been better met. This will all have been achieved in ways that reduce the impact of society on the environment, improve the quality of design of the built environment and protect and enhance Hambleton's environmental assets such as its historic heritage.***

An example of the third approach is Colchester:

***By 2021, Colchester will be a prestigious regional centre. The historic Town Centre will be the cultural and economic heart of the Borough, surrounded by thriving suburbs, villages and countryside. New cultural, retail, office and mixed use developments will be delivered through regeneration of the Town Centre and its fringe. Urban Gateways to the Town Centre will be regenerated to present attractive entry points to Colchester and stimulate sustainable development. Key community facilities will be delivered and expanded, including the University of Essex, Visual Arts Facilities, General Hospital, Colchester Institute, and Community Stadium.***

***(The Vision then goes on to deal in some detail with the suburbs of Colchester, transport, the main villages and the environment)***

The main issues seem to be:

- Whether the adoption of a single "Joint Vision" would be acceptable to the Inspectorate.
- To what level of detail that Vision needs to go.
- Does its content need to be changed?

Go East do not make specific mention of this issue, although it could be said that taking on board their comments would make any vision far more of a Planning Strategy rather than appropriate for a Sustainable Community Strategy. Indeed Go-East say that the Joint Vision as it stands is more akin to one for a Sustainable Community Strategy.

### **Recommendation**

**It is recommended that the Core Strategy Vision should be made more place-specific and should set out in more detail the vision for specific parts of the District, including the main towns and rural areas. This would be based upon the concentration of services and development in the main towns and the need to provide rural sustainability and protect the environment.**

## **Content of the Vision**

### **Other comments**

The points raised by Natural England and the comments about a low carbon society relate to very important issues for the District. It would be relatively simple to amend the text to incorporate suitable wording and indeed the matters raised above relating to the detail of the Vision would make such changes sensible and easier to achieve. The wording will be examined to see if it is possible to make improvements more specific as suggested by Finchingfield Parish Council.

### **Recommendation**

**It is recommended that revised wording be prepared for the Vision for Braintree District, (which can be discussed with Go-East) along the following lines:-**

***“By 2025 a more sustainable future will have been secured for all the people and places in the Braintree district.***

***The development, growth and regeneration of Braintree, Halstead and Witham will have delivered most of the housing, jobs and services needed for the district, including shopping, health, education and leisure.***

***Our villages and rural areas will have been made more sustainable by delivering regeneration where needed and acting on local needs by supporting the provision of local housing, jobs and services.***

***All development across the District will have been built to the highest design and energy efficiency standards, will have enhanced our historic towns, village, buildings and countryside, and minimised our impacts on the local and global environment”.***

NOTE If this is adopted as a joint vision for the Core Strategy and Sustainable Community Strategy, the Local Strategic Partnership will need to agree it.

### **Aims**

Most responses supported the Aims .Specific comments are set out as follows:-.

- Natural England would like to see “addressing climate change” added to the aims of the strategy.
- Additional Aim suggested - to secure the Document’s commitment to the Nottingham Declaration on Climate Change, which is now Council Policy
- Suggests substituting “sustainable “for “prosperous” in Aim 2

### **Officer Comments**

The Aims set out the links between the Vision and more detailed objectives. They to some extent reflect the overriding Aims of the SCS as drafted, but this should not prevent changes being made (it should be remembered that both Strategies were out on consultation and so should be subject to change).

The issue relating to climate change and how it may be tackled locally, is central to national and regional policies, was suggested for inclusion in the Vision, and will impact on most of the policies in the Sustainable Community Strategy and Core Strategy. It is considered that it should be made explicit in the Aims.

### **Recommendation**

**It is recommended that the issue of addressing Climate Change be included in an additional Aim.**

### **Objectives**

Most responses supported the Objectives. Specific comments are set out below.

### **Statutory Consultees Comments**

- Natural England – Suggest placing more emphasis on energy reduction and the use of alternative energy sources to impact on climate change. Also make mention of landscape in Point 11.
- Environment Agency -An additional spatial objective should be added to this section, along the lines of *‘To ensure that development avoids Flood Risk areas and reduces future flood risk where possible’*.
- Go –East -The objectives are largely felt to be ‘general anywhere type expressions’ and whilst in this sense they are acceptable they are not felt to be ‘spatially specific or distinctive to Braintree’ in the way we expect objectives that stem from a ‘Core Spatial Strategy Vision Statement’ to be. The relationship to the 3 Guiding Principles is also unclear as is the relationship to the Community Priorities set out for the Sustainable Community Strategy.

### **Other Comments**

- Objective 9 is amended so that after ‘environmentally friendly’ the words ‘low carbon generating’ are inserted, so as to place greater emphasis upon developments that help mitigate against global warming.
- Galliard Homes Ltd – object to Objective 5 limiting development to the main towns, Suggest development of a new settlement at Boxted Wood would deliver long term sustainable growth beyond the plan period.
- Unex Towerlands -propose that in respect of housing delivery the Local Development Framework should also state that the Regional Spatial Strategy targets should be exceeded in order to be in accordance with the Regional Spatial Strategy housing policies.
- In point 2, add “and energy” after resources. In point 10, delete “irretrievably”.
- Rest of Plan does not deliver on the Vision and Objectives
- Objective 8 should refer to business parks to offer more flexibility for commercial developers



## **Officer Comments**

- Most of the responses raise detailed issues regarding the content or wording of individual objectives. These can be relatively easily dealt with and are supported apart from the comments made in respect of the Boxted Wood proposals, as they would conflict with the overall Spatial Strategy.
- However the points raised by Go-East relate to the overall approach, to the wording of the objectives and how they relate to other parts for the document and therefore present more difficult issues.
- The relationship to the Community Priorities is one of the areas where the joint document has caused a degree of confusion, as these themselves are seen as separate objectives for the Community Strategy elements of the document.
- However it will be necessary to separate the final documents for production and adoption, so the two sets of “objectives”, which will deal with similar issues from different angles will have to stand alone and be clearer. It will still be necessary to make sure that they are complementary to each other.
- This separation will also reduce the impression that there is duplication between the Sustainable Community Strategy and Core Strategy.
- The relationship to the 3 Guiding Principles needs to be reviewed to make sure they are complementary and avoid repetition. This matter will be addressed more fully in the next section of this report when the 3 Guiding Principles are discussed.

## **The Key Objectives**

A brief review has been undertaken of objectives in other approved and adopted Core Strategies. It is clear that most other Core Strategy objectives follow a similar style of wording to the Braintree Core Strategy in that they are by and large rather general in nature, but do identify some key local issues such as objectives for development /conservation /economic development etc. This would help in making them more measurable in terms of deliverability and monitoring.

The Planning Advisory Service guidance gives some examples of Objectives and again these are quite general, but with some key local criteria.

## **Recommendations**

- **The aims, key objectives and guiding principles should be rationalised and where possible combined and made more locally specific to Braintree District and more measurable.**
- **They should remain compatible with those in the Sustainable Community Strategy.**
- **The detailed points raised in the responses are included where possible (subject to editing mentioned above) apart from the Boxted Wood proposals.**

## **The Three Guiding Principles**

### **Policy GP1 – Promoting and Delivering A Sustainable Future**

## **Objections**

- Concerned about the ability of the strategy to meet the needs of rural areas and residents in terms of employment, access, services and housing when development is concentrated in Main Towns and Key Service Villages (Castle Hedingham Parish Council, Great Bardfield Parish Council)
- Guiding principle is too focussed on planning and should include a more community aspect (LSP)
- Additional bullet points to secure better balance of jobs and employment and suggestion that employment should be located in accessible places (Essex County Council)
- The policy doesn't indicate what, how, when and where development will be delivered in a sustainable way. It is imperative that a Core Spatial Strategy is expressed in the form of a clear cut programme of action. (Go-East)
- The policy is too vague
- The policy should also focus on quality and types of jobs provided to reduce the level of out-commuting
- It is considered that housing, sport and recreation facilities should be added to bullet point 3
- The proposed policy repeats national and regional policies and should not be needed.

## **Support**

- The most sustainable location of additional development is in market towns
- Supports the principles of sustainable development laid out in this policy (Natural England)

## **Recommendations**

- **To remove the word policy and assert that this is a principle which underlines the later policies.**
- **To include more specific information relating to Braintree District to avoid repeating national/regional government guidance**

## **Policy GP2 – The Protection and Enhancement of the Environment in the District**

### **Objections**

- Special character of countryside should be preserved and enhanced
- Historic environment is a dimension of both urban and rural environments (English Heritage)
- Largely a statement of intent. Not clear when, where and how (Go-East)
- Councils approach to flood risk management should be included in the Core Strategy (EERA)
- Guiding principle is too focussed on planning and should include a more community aspect (LSP)

- References to creating better work environments should also be included
- The emphasis in this policy is on the built environment, it should be made clear that natural environments and habitats should also be protected and enhanced (Environment Agency)

### **Support**

- Strongly endorse the protection of the natural and built environment (Great Bardfield Parish Council, Anglian Water, Natural England, Essex County Council)

### **Recommendation**

#### **No change to the Core Strategy**

### **Policy GP3 – Delivering the Development we need**

#### **Objections**

- Housing allocations across the District should be increased to deal with population trends and the fact that not all urban capacity sites will come forward.
- No more building until the A120 is sorted out
- Guiding principle is too focussed on planning and should include a more community aspect (LSP)
- Support the policy set out, but consider it not sufficiently comprehensive to cover all types of housing
- Reference should be made to Braintree's provision of 14,000 jobs (Essex County Council)
- 'Other Villages' need an increased proportion of affordable housing and more small business premises and home-working (Great Bardfield Parish Council).
- There is no information on how the development will be promoted and where it will be delivered. There is no point in formulating a policy statement of this kind, if it is too vague (Go-East)
- An early release of additional strategic employment land is needed to contribute to the jobs target.
- Policy should recognise the East of England Plan requirement as a minimum (not a ceiling). Consequently it is important to plan for additional sites should any of the Councils strategic sites not come forward in the given timeframe.
- Affordable housing targets do not have an evidence base to show the viability of proposals. A more flexible approach would allow the viability of each site to be investigated.
- The National Housing and Planning Advisory Unit recommend a further 20% increase in housing provision should be planned for.
- No evidence base to justify why there is more growth proposed at Witham, than the main town at Braintree.
- Plan to 2026 to allow for slippage when adopting the Core Strategy.
- Council needs to aim for much higher development rates of employment land to stem out- commuting.

## **Support**

- Supports identifying key sites for regeneration

## **Officer Comment**

Provision for small scale development in other villages can be dealt with through the Allocations document.

The Employment Land Review has already identified currently available employment land to contribute to the jobs target.

## **Recommendations**

- **Extend the period covered by the plan to 2026, to allow for a 15 year plan period from the date of adoption of the document.**
- **Clarification on whether the jobs target is up to 14,000, as set out in the Cambridge Econometrics report, or should be expressed as contributing towards the 54,000 jobs in the rest of Essex, as set out in the East of England Plan.**
- **Set out the basis for the proportion of growth allocated at Braintree and Witham.**

## **Part 4 – Planning for the Future Growth of Braintree District**

### **Key Service Villages (paragraph 4.5)**

The key service villages have been identified in paragraph 4.5 of the Core Strategy. They include; Coggeshall, Earls Colne, Hatfield Peverel, Kelvedon, Sible Hedingham and Silver End.

Key Service Villages are defined in the East of England Regional Plan. They should be large villages with good levels of service, which contain a primary school, a secondary school within or accessible by public transport, primary health care facilities, a range of retail services capable of meeting day to day needs, local employment opportunities and frequent public transport to higher order settlements.

## **Objections**

- Kelvedon and Feering should be considered as a single settlement for the purposes of Key Services Villages. As they can meet rural needs in a sustainable way.
- Key Services Villages should be split between primary and secondary service villages, taking into account access to road and rail links. Hatfield Peverel, Kelvedon and Feering and Bures Hamlet should be primary service villages and Coggeshall, Earls Colne, Sible Hedingham, Silver End and Steeple Bumpstead should be secondary service villages.
- Bures and Bures Hamlet should be linked and considered a Key Service Village
- Greater flexibility required to enable greenfield land releases to be delivered earlier in the plan period.
- Key service villages should be ranked in terms of suitability of development based on population and transport links. Should be

ranked; Hatfield Peverel, Earls Colne, Kelvedon, Coggeshall, Sible Hedingham and Silver End.

- KSV's seem to have more priority for development than Halstead which could affect investment in the town. Some development should be allowed in Halstead.
- More detail should be provided as to the regeneration sites in the key service villages, in particular the Crittalls site in Silver End.
- Changes should be made to 4.11 to reflect modest growth at KSV's
- Housing growth should not be allowed in Sible Hedingham, as it is in need of employment and services.
- Halstead should be designated a KSV rather than a town.
- Development should be allowed at Halstead and Castle Hedingham
- No indication is given as to whether a review of village envelopes will be conducted at the site allocations stage
- Finchingfield should be classified as a KSV
- Support for appropriate development in and where appropriate adjoining villages should be more explicit
- Development in KSV's should not rule out greenfield development
- Sible Hedingham needs services to support existing residents. Market housing will just add to this problem.
- More key service villages are needed in the north of the District
- Advocate a more flexible approach to growth across the District and suggest an appropriate level of growth should be directed to Key Service Villages.
- Rayne should be identified as a Key Service Village.
- The role of KSV's cannot be achieved if development is restricted to existing village envelopes.

### **Support**

- General support for the principle, however ranking of the villages would not be appropriate.
- Support for Silver End, Coggeshall and Sible Hedingham, Kelvedon and Hatfield Peverel as Key Service Villages
- Support for development of new sites at Silver End.
- Supports retention of all of the key service villages.

### **Recommendation**

**Add a reference to the Allocations Development Plan Document and its potential to review development boundaries in Key Service Villages. No greenfield development proposed around edges of Key Service Villages.**

### **Other Villages (paragraph 4.5)**

Other villages are those not identified as Key Service Villages. Reference is made by objectors to the "Taylor Review". This document's full title is "Living Working Countryside – The Taylor Review of Rural Economy and Affordable Housing" and was published in 2008. None of its recommendations have been adopted as government policy.

## **Objections**

- Interconnectivity between villages should be considered rather than looking at them individually when deciding KSV's (Finchingfield, Great Bardfield and Wethersfield should be considered as a whole).
- Links to larger towns should also be considered.
- Finchingfield should be considered as a KSV to support the north western rural part of the District due to its wide range of facilities and accessibility
- Does not sufficiently address sustainability in other villages as it limits development to employment and affordable housing. It is insufficiently positive in light of the Taylor review.
- Growth should be allowed in villages close to urban areas as there is no need to keep them separate.
- Villages in the north of the District have a close relationship to Haverhill and should be considered for further development.
- No other suitable options exist however increase Urban Capacity and more sites in smaller villages could replace the growth option north east of Witham

## **Support**

- Support allocation of Ashen as "Other Village" as it has sustainability issues which development could address.
- Market housing in and adjacent to more rural locations would allow provision of a mix of housing types and tenures and contribute to the provision of services.
- Support for provision of jobs and services for local villages.

## **Recommendation**

**No change to list of key service villages set out in the Core Strategy**

### **4.12 – Where should growth be located?**

## **Objections**

- The wording should be changed to ensure open areas between towns and villages be retained.
- Change wording to allow for limited development to serve or deal with specific local issues can be located in or adjacent to KSV's
- Rivenhall falls under the category "Other Villages" and is not suitable for growth. Doubling the population does not meet sustainability criteria.

## **Recommendation**

**No change to Core Strategy**

## **Box 2 The Preferred “Spatial Policy Statement” for the Braintree District**

### **Objections**

- Reference to the Key Service Villages and Witham should be removed and replace with development along the A120 to take advantage of this existing transport corridor.
- The priorities for development need to be done in relationship to the proposed settlement strategy, such as prioritising previously developed land over greenfield sites. (Essex County Council)
- More consideration needed as to the role of the District in relation to the sub regional centres and Stansted Airport (EEDA)
- Existing business parks and employment sites should be the focus for development as this is more sustainable than other locations.
- Growth in the Halstead area should be for employment and services not housing

### **Support**

- Development in rural areas should be restricted to what needs to be there and should not damage the environment
- Larger villages should be encouraged to continue to provide important services
- Support the basic framework for all forms of development
- Supports the strategy focusing development in towns and key service villages and the aim to maintain, improve and protect villages and the countryside
- Development should be in Key Service Village’s and main towns, to provide easy access to services and facilities.

### **Recommendation**

**Make clearer reference to previously developed land in the last bullet point of Guiding Principle 1.**

## **4.24/4.25 – The Other Villages**

### **Objections**

- Local need should be qualified by a rural policy to prevent it being used to justify inappropriate development at a smaller village in the countryside
- Development which provides affordable housing also provides significant levels of market housing, resulting in unsustainable travel patterns. Need a greater emphasis on affordable housing for local people.

### **Support**

- This policy underlines the need to delete the growth area north east of Witham, as it is within Rivenhall Parish
- Support development for local need in other villages subject to local support

### **Officer Comment**

The area north- east of Witham will be considered in the context of the growth locations, rather than in the context of other villages.

### **Recommendation**

**No change to Core Strategy**

### **4.26/4.28 – The Countryside**

#### **Objections**

- Additional reference should be made to broadening public access for the enjoyment of the tranquillity of the countryside.

#### **Support**

- Support and encourage the initiatives set out in this paragraph
- Support increased public access to the countryside the proposed Rivenhall Country Park would contribute to this initiative.

### **Recommendation**

**No change to the Core Strategy**

### **ALT7 - New Settlements**

Possible alternative Growth Location options and the reasons why they have not been proposed.

*A 'new settlement' means a large scale development, usually of 5,000 or more houses, which is separate from the Main Towns and Key Services Villages. The scale of growth proposed in the Braintree District will mainly be met on brownfield sites within the Main Towns and Key Service Villages. The overall scale of development required is not large enough to justify the development of new settlements. Finally a new settlement would make it much more difficult to provide for the necessary affordable housing and services to justify the development of new settlements. A new settlement would make it much more difficult to provide for the necessary affordable housing and services that are needed to support the existing village communities in the District.*

*Braintree District Council has received representations for new settlements at Boxted Wood (partly in Uttlesford), Marks Tey (partly in Colchester) and Andrewsfield – adjoins Boxted Wood site.*

### **Comments on ALT 7 – Alternative Option 7: Promote new settlements**

#### **Objections**

- Object to growth locations at Braintree and Witham, as Council risks severe housing shortages without another option for growth as part of a new settlement.
- Boxted Wood would be sited predominately in Uttlesford and could provide much needed housing, jobs and infrastructure for the Braintree District.



- A new settlement at West Tey would facilitate opportunities to improve the A120 and wider infrastructure requirements, with wider benefits of accompanied economic growth.

### **Support**

- Support the concept of Growth Locations rather than new settlements, although the aim should be to attain the highest level of self containment as possible.
- There are no clear reasons to support the need for new settlements to meet the housing requirements identified in the Braintree District. However, the reasons for not proposing the option is focused on the 'eco towns' process and do not appear to have considered the policies of the approved East of England Plan and review of this plan to 2031. *(Cambridgeshire County Council)*

### **Recommendation**

**No change to the Core Strategy**

**Report prepared by Emma Boaler, David Cookson, Alan Massow and Juliet Strathern. Planning Policy.**